
Report To: Safe, Sustainable Communities Committee **Date:** 26 October 2010

Report By: Corporate Director,
Regeneration and Environment **Report No:** R&E/R&P/SSC/
10/10/01/SJ/FJM

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**Subject: Glasgow and the Clyde Valley Strategic Development Plan:
Main Issues Report**

1.0 PURPOSE

- 1.1 To inform the Committee of the approval by the SDPA Joint Committee of the Glasgow and the Clyde Valley Strategic Development Plan: Main Issues Report (MIR) for publication and consultation; to highlight the main issues, with reference to Inverclyde; and to seek approval of a formal response to the Plan.

2.0 SUMMARY

- 2.1 The Glasgow and the Clyde Valley Strategic Development Planning Authority, on 13th September, approved for publication and consultation, the first key stage in the preparation of a Strategic Development Plan (SDP) for the Glasgow City Region. The MIR will be the subject of consultation, from 30th September to 26th November 2010.
- 2.2 In view of the timing of the public consultation, this report has been prepared largely on the MIR itself and not a close detailed reading of the Background Reports and SEA. Thirteen Background Technical Reports support the MIR, one of the most significant being the Housing Need and Demand Assessment (HNDA). However, due to the complexity of the HNDA, it has been delayed but is expected to be published this week. This delay will have a knock-on impact for preparation of the Council's Local Housing Strategy and likely, Local Development Plan: Main Issues Report.
- 2.3 The requirements of the new Planning system for SDPs to be more visionary, strategic and long term (to 2035), and to be more focussed and slimmer in both content and policy have been fulfilled in the GCV SDP MIR. To that extent there are fewer pointers in this MIR for the preparation of the Inverclyde Local Development Plan: Main Issues Report than would have been the case in a Consultative Draft Structure Plan.
- 2.4 The SDPA Joint Committee has approved the following main issues: (1) Breaking Down Distance to Economic Markets; (2) Supporting A Sustainable Economy; (3) Promoting Environmental Action – An Economic Necessity; (4) Promoting Sustainable Locations for Development; and (5) Tackling Risk – Strategic Development Priorities. Twenty-six questions are posed to guide responses and the main issues for Inverclyde are outlined.

3.0 RECOMMENDATIONS

- 3.1 That Committee:
- (a) note the publication of the GCV SDP: Main Issues Report for public consultation;
 - (b) endorse the key issues identified as being those that should inform the preparation of the MIR of the Inverclyde Local Development Plan (Section 8.0); and
 - (c) approve this report as the Council's formal response on the SDP MIR.

Aubrey Fawcett
Corporate Director, Regeneration and Environment

4.0 BACKGROUND

4.1 The Joint Committee of the Glasgow and the Clyde Valley Strategic Development Planning Authority, on 13th September, approved for publication and consultation, the first key stage in the preparation of a Strategic Development Plan (SDP) for the Glasgow City Region. In accordance with its published Development Plan Scheme, the Main Issues Report will be the subject of an eight-week period of consultation, from 30th September to 26th November 2010. The Plan has been advertised in the Greenock Telegraph on 8th and 15th October and placed in local libraries (refer Annex One).

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para 162**

4.2 The Planning, etc. (Scotland) Act 2006 requires local authorities in the four largest City Regions in the country to work in formal partnerships to prepare the strategic-level of the new style development plans. The Glasgow and the Clyde Valley Strategic Development Planning Authority (GCV SDPA) (comprising the eight local authorities within the City Region), is charged with the review of the current approved strategic plan – the Glasgow and Clyde Valley Joint Structure Plan – and the preparation of what is now known as the Strategic Development Plan (SDP). At the local authority level, each council is required to prepare its Local Development Plan (LDP), having regard to the SDP. Together, the SDP and the LDP will form the new Development Plan for each of the constituent authorities within the Glasgow and the Clyde Valley City Region.

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28/10/08,
para 748**

4.3 The 2006 Planning Act and supporting legislation prescribes the form and content of the new development plan system, with a change to what is called a *Main Issues Report* (MIR) (the first main stage in plan preparation) and then a *Proposed Plan*. The MIR is not the same as the 'old style' Consultative Draft plans: rather in keeping with the requirement for the new plans to be more open and transparent in their preparation, the MIR would set out a preferred development strategy option and also a number of viable alternatives, each informed by being the subject of a Strategic Environmental Assessment (SEA). To this extent the new system is more 'front-end loaded', taking into account and publishing alternative planning scenarios, before councils' conclude with their preferred plan at the Proposed Plan stage.

4.4 Planning legislation stipulates that SDP MIRs are to be visionary, long term (25 year plans) and genuinely strategic, setting out a clear development (or settlement) strategy indicating where new development should and should not take place. Having done so, it is the job of the local authorities in their respective LDPs to outline the detail of these development requirements in terms of locations and actual sites (for a period of 5-10 years). Each tier of plan should be reviewed every five years.

4.5 As indicated, planning legislation makes clear that MIRs are not draft versions of plans, but essentially *issues* documents. They should make clear in what respects the existing approved plan is still relevant and should remain unchanged, and in that context highlight the key changes that are required and preferred, and set out other alternative development options. The focus of the MIR is on where change is required and how it could be delivered on a sustainable basis, with locations and development priorities clearly identified. The significance of the SDP is that it establishes the principle for development at the strategic level, so engagement and involvement at the MIR stage is important in influencing the final shape and content of the SDP Proposed Plan, which in turn will inform the LDPs.

4.6 The GCV SDP MIR has been prepared in the spirit of the 2006 Planning Act, benefitting from a long lead-in process of engagement and consultation. This has involved the officers of the constituent councils, Scottish Government and its 'Key Agencies', and a wide range of stakeholders representing the investment and development sectors, and their planning advisers. The GCV SDP MIR comprises firstly, the MIR itself, including a reasoned justification for the main issues that require to be addressed in a plan extending to 2035; the preferred development strategy with accompanying priorities and reasonable alternatives; and importantly the legacy of the current 2006 GCV JSP which was only approved in 2008 and therefore in large part is relevant to this new SDP. Secondly, the evidence supporting the SDP MIR is contained in 13 Background

Refer to
Section 9.0

Reports; and thirdly, as required by law, a SEA in the form of an Environmental Report.

- 4.7 It should be noted however, that this is solely a Regeneration and Planning Service response, and has been prepared largely on the MIR itself and not a close detailed reading of the Background Reports and SEA. Officers, including liaison with other relevant services such as Environmental Services, will continue to be involved in this examination over the coming months and in the lead-in to the next stage of preparing the SDP Proposed Plan in the new year.

5.0 PROPOSALS

- 5.1 The GCV SDP MIR is comprised of six sections, spread across a curious A4 square glossy quality paper format. Designed around bold, colourful graphics, is an Introduction (section 1) which sets out the legislative background and purpose of the MIR, its three component parts (some of which is outlined above), and finishes on the Scottish Government context in the form of national planning framework, Scottish planning policy guidance and the strategic transport projects review. This is followed by sections on:

- (2) the legacy of the current approved 2006 GCV Joint Structure Plan and its 'Metropolitan Development Strategy';
- (3) an outline of strategic 'drivers of change' for the SDP;
- (4) the vision and development principles underpinning the preferred long term sustainable strategy to 2035;
- (5) the Main Issues and Key Challenges for the SDP; and
- (6) a detailed exploration of the five main strategic planning issues facing the City Region.

The next stages in the SDP process are identified after Section 6.

- 5.2 The SDPA Joint Committee has approved the following five main issues: (1) Breaking Down Distance to Economic Markets; (2) Supporting A Sustainable Economy; (3) Promoting Environmental Action – An Economic Necessity; (4) Promoting Sustainable Locations for Development; and (5) Tackling Risk – Strategic Development Priorities. Twenty-six questions are posed to guide responses to the MIR. The responses to these questions that are recommended for approval are contained in Annex Two.

Annex Two

- 5.3 **Metropolitan Development Strategy Legacy** – the approved 2006 GCV Joint Structure Plan has been recognised by the Scottish Government in terms of its strategic significance with a number of the major locations in the Plan counted as 'national developments' in its National Planning Framework (NPF2), published in 2009. These include 'Clyde Waterfront' (including *Riverside Inverclyde URC*); Clyde Gateway, including sites for the 2014 Commonwealth Games; Ravenscraig (Motherwell/Wishaw); The Green Network (integrated environmental enhancements); Community Growth Areas (13 such locations including Bishopton); Glasgow City Centre; and a number of 'Key Infrastructure Priorities', including the Metropolitan Glasgow Strategic Drainage Plan and the Scottish Government's Strategic Transport Projects Review. In relation to longstanding and somewhat intractable issues, the priorities for development in the MDS associated with (1) the legacy of vacant and derelict land, and (2) our deprived and excluded communities, remain highlighted, for the emerging SDP.

- 5.4 **Strategic 'Drivers of Change'** – these are fundamental to an understanding of the sustainable strategic principles underpinning the SDP MIR's preferred development strategy. The 'drivers' are: the economy and population; the raft of environmental legislation and action expected in/of society, with Climate Change mitigation legislation at the forefront; Government's commitment to sustainable economic growth and development and the suite of planning and other policy guidance and advice in place to implement this objective; and future capital expenditure, both public and private.

- 5.5 **Vision and Development Principles** – these derive partly from existing corporate visions, for example the Glasgow and Clyde Valley Community Planning Partnership's (GCVCPP) vision. The *Strategic Futures Group's* conclusions have also been

instrumental in shaping the vision, particularly with such a long term horizon to 2035. Similarly the joint work on *Greenhouse Gas Emissions* has influenced greatly the SDP's preferred spatial strategy of sustainable development. This strategy has the following development principles:

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3 and 4

- (1) cumulative growth that can be achieved through *agglomeration*, ie. exploiting city-region economies of scale based on clustering of activity in centres (City and towns) accessible by mass-transit public transport and IT interconnections;
- (2) *regeneration and renewal* of the urban fabric (re-use of vacant and derelict land, and associated service infrastructure), and increasing densities, where appropriate in the City and surrounding towns;
- (3) *environmental recovery and land re-cycling* (the 'brownfield land resource), for both productive uses, including low density and 'soft' end uses, ie. greening;
- (4) *a multi-purpose environment* (both rural and urban) that enhances quality of life and well-being, in its role as a 'place-setter', supporting economic competitiveness, and protecting biodiversity;
- (5) *integration of land use and transportation*, supporting higher levels of agglomeration and higher density (as above) and promoting 'modal shift' from private to public transport; and
- (6) promotion of the '*proximity principle*' and *local supply*, so as to reduce the need for travel and the sourcing of goods and materials on a more sustainable basis.

5.6 **Main Issues and Key Challenges for the SDP** – these have been informed by commissioned work on the future economic prospects for the Glasgow City Region from *Oxford Economics* and the in-house Housing Need and Demand Assessment (assisted by *Tribal/Optimal Economics*), setting out future scenarios for population and household growth (by tenure), and associated economic/employment prospects. The HNDA has an end date of 2025, based on accepted timeframes for modelling such forecasts.

Background
Report nos.
5 and 10

5.7 The GCV SDPA Joint Committee has adopted a similar 'Planning Scenario' to that in the approved 2006 Joint Structure Plan, albeit this forecast based on a 'higher level of net-in-migration' is not expected to return until after 2020, once the full effects of the current economic recession/downturn has worked its way through. The choice of this scenario accords with the GCVCPP vision, although the MIR acknowledges the prospect of a lower rate of growth and corresponding lower rate of in-migration in another 'Lower Growth Scenario'. A major issue identified in *Oxford Economics*' forecasting study is the uncertainty over employment-growth, their view being that there is likely to be considerable 'slack' in the jobs market with knock-on consequences for the attraction of the City Region leading to continued low levels of in-migration.

5.8 Allowing for these differing views of the future, the 'Planning Scenario' is considered to provide a clearer direction for the local authorities and partners to plan ahead with sustainable economic growth at the centre of the vision. It continues with the underlying assumptions for economic growth in the approved GCVJSP 2006, but with reduced net in-migration and reduced household growth assumptions, and therefore, a 'delayed growth path' now forecast to take a longer time to be realised. This scenario allows over the long term for a recovery in the global, European and UK economies, with assumed increases in net in-migration and a demand context which has a greater degree of flexibility built-in and a land supply that is more than adequate to meet these potential demands. This is particularly important in relation to the Government's expectations in relation to having a 'generous' housing land supply to meet demand for private sector housing, including its desire for more affordable housing to be provided (refer to paras 5.18 to 5.20 below).

5.9 The SDPA Joint Committee has approved the following main issues, linked specifically to the main 'driver' of the future growth and development of the City Region – the performance of the economy:

- (1) The Economy and its External Context - Breaking Down Distance to Economic Markets (*ie. improving the City Region's sustainable connections to markets (international, EU and UK), and enhancing the scale of its economy and its ability to*

compete (through greater collaboration with the Edinburgh City Region);

- (2) The Economy and its Internal Context - Supporting A Sustainable Economy (*ie. identifying key economic development locations which have the necessary quality, sector focus and accessibility to foster sustainable economic growth, and securing the role and function of these in relation to the growth sectors identified*);
- (3) The Economy and the Environment - Promoting Environmental Action: An Economic Necessity (*ie. securing economic development and investment whilst achieving environmental objectives, developing programmes of positive action to integrate multiple economic, social, health and environmental objectives, and safeguarding and protecting strategic environmental resources*);
- (4) The Economy and Supporting Development - Promoting Sustainable Locations for Development (*ie. identifying development locations that meet the 'drivers of change' and meet the forecast demand for new development capacity (eg. housing and retail), maximising existing and planned transport and drainage infrastructure capacity, and securing where appropriate, priority for infrastructure investment to support and enhance sustainable locations*); and
- (5) The Development Strategy, Risk and Priorities - Tackling Risk: Strategic Development Priorities (*ie. keeping the focus on priorities in the context of competing demands, and managing the phasing and sequencing of priorities in line with available resources*).

Under each of these main issues, questions are posed to guide responses on the SDP MIR: Annex Two outlines the recommended responses for approval.

Main Issues : Implications for Inverclyde

5.10 This section summarises the principal elements of strategy as expressed under each of the five main issues, with particular reference to Inverclyde. The MIR as required by the new planning legislation includes under some of the main issues, an alternative strategic approach and potential alternative locations for development to that endorsed as the 'preferred strategy' by the SDPA Joint Committee.

(a) Main Issue 1 : Breaking Down Distance to Economic Markets

5.11 This issue includes:

- (i) *Glasgow International Airport*, the safeguarding and promotion of its role and importance (a NPF2 priority), as the principal external gateway to the City Region, both in terms of business and tourism: this includes in this airport's approved masterplan, measures to improve the immediate transport connections (road and rail) to the rest of the City Region and beyond.
- (ii) *High Speed Rail*, to London and the Channel Tunnel, with terminal enhancements in the centre of Glasgow, maximising connectivity to all parts of the City region: this is a long term project, unlikely to be in place post 2025-30.
- (iii) *Strategic Roads*, M74 and M80 completion, and A8/M8 upgrades, while recognising specific capacity issues, such as at Glasgow Airport.

5.12 The fourth key dimension of this Issue is the competitiveness and scale of the City region economy, and the potential to deepen the collaboration between the two major city-regions of Glasgow and Edinburgh. The outcome of the work of the '*Glasgow-Edinburgh Collaborative Initiative*' (GECI), on practical measures to realise this potential will hopefully be finalised in time for the SDP Proposed Plan.

(b) Main Issue 2 : Supporting A Sustainable Economy

5.13 Among the dimensions of this Issue are:

- (i) *Key Growth Sectors* are expected to be business services, financial services, distribution/logistics and digital, which would act as the economic ‘drivers of change’, *Oxford Economics* acknowledge that there is a great deal of uncertainty associated with such forecasting, including the link between productivity growth and increase in jobs. One constant running through the forecasts however is the shift away from ‘carbon-intensive’ industrial processes and energy infrastructure to ‘green technologies’. This re-balancing expected in the economy highlights the other key sector driving change – a shift to more ‘creative industries’, high-tech manufacturing, including ‘green’ technologies and renewables, and leisure/tourism related job growth. On the down-side, these forecasts of where growth is expected to come from need to be balanced by the expected cuts in the public sector, especially over the short term of the Plan.
- (ii) *Strategic Economic Investment Locations* (SEILs) are proposed as the means to provide the most appropriate amount and most sustainably located land to support these anticipated growth sectors. The approach proposed by the SDPA Joint Committee is to rationalise the number of ‘strategic locations’, having identified a limited number on the basis of their roles and functions in the City Region. The locations identified are split between ‘safeguarded locations’ and ‘opportunity locations’, the former having little capacity for future growth but of strategic significance in terms of current use, location and accessibility, the latter with substantial capacity for future development.
- Inverclyde has one SEIL: the Greenock – Port Glasgow waterfront (Riverside Inverclyde), identified as an ‘opportunity location’ for ‘business and financial services’, ‘distribution and logistics’, but this latter sector is an error, rather it should be recognised as a location suitable for ‘green technologies’ and potentially renewable high-tech manufacturing.

Background
Report no. 5

Background
Report no. 7

5.14 The SDP MIR recognises that with a more limited list of ‘SEILs’ than the current GCVJSP 2006, it is important to stress that other locations in existing adopted local plans play a strategic role important to the regional economy and will continue, where appropriate, to be protected and promoted through the forthcoming LDPs.

(c) Main Issue 3 : Promoting Environmental Action – An Economic Necessity

5.15 This section of the MIR covers a broad range of environmental issues both in terms of it as a heritage asset and a resource, some of which are more important to Inverclyde than others. These dimensions of environment are:

- (i) *Economic Competitiveness*, enhanced by having a high quality environment surrounding the City and towns across the region (the Green Belt being particularly significant), and the role it plays in ‘place-setting’ and ensuring key destinations are safeguarded and promoted for tourism, including as day-trip destinations (eg. Clyde Muirshiel Regional Park).
- (ii) *Recreation and Health*, recognising the value of City-region ‘green lungs’ for the health and well-being of the region’s inhabitants, and initiatives and projects to enhance these assets (eg. Core Path Plans).
- (iii) *Infrastructure*, having regard to the natural environment with respect to flood prevention and water retention, and the management of the City-region’s river catchment and drainage networks (key partners being SEPA, Scottish Water and SNH), and the potential to extend forestry and woodland to augment ‘carbon capture’ and contribute to the reduction in CO2 emissions.
- (iv) *Energy*, in particular the potential for more renewable development projects such as biomass production using wood-fuel, in addition to wind energy.
- (v) *Nature*, protecting the region’s environment as a resource for biodiversity and enhancing its natural habitats (eg. Inner Clyde and Renfrewshire Hills SPA/SSSIs).
- (vi) *Resource Development*, protecting reserves to exploit for their economic value, such as timber, minerals and as above, land suitable for wind farms.

- 5.16 The SDP MIR sets out its preferred approach to the protection and development of these habitats and resources, respectively, with a clear spatial strategy for: the Glasgow and Clyde Valley Green Network and Green Belt; the Indicative Forestry Strategy and Woodland Framework; River Basin Management Plans; and Natural Resource 'Search Areas' (eg. for on-shore renewable energy production, surface coal reserves and aggregate minerals (the latter still a subject under development)).

(d) Main Issue 4 : Promoting Sustainable Locations for Development

- 5.17 This main issue covers the two most dynamic development sectors and principal users of land within the City Region, namely Housing and Town Centres/Retailing, Transport and other Infrastructure. The assessments of demand and need to determine whether there is sufficient capacity to meet forecast requirements in these sectors is outlined.

Housing

- 5.18 The long term strategic planning of housing for the City Region is the concern of the SDPA and under new Housing Need and Demand Assessment (HNDA) guidance introduced by the Scottish Government in 2007/08, a Glasgow and Clyde Valley Housing Market Partnership has undertaken a detailed technical assessment of housing requirements across all tenures, an evidence base that is to serve not only the SDP, but also council's Local Housing Strategies and in turn LDPs. This work has been a particular challenge for the officers involved, comprising the constituent council's planning and housing functions and Scottish Government officials.

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28/10/08,
para 748**

- 5.19 The HNDA guidance introduced a revised approach to assessing housing need and demand which required the integration of different methodologies and the examination of what it termed the 'intermediate sector' – housing such as shared equity and shared ownership, otherwise known as low cost housing or 'affordable housing'. Due to the complexities involved, the final outcomes of the HMPs work is still awaited, in particular the results relating to the 'Social Rented Sector' and this 'intermediate sector'. It is intended to have the HNDA Background Report available for publication and consultation by the end of October. Insofar as this sector is characterised by the requirements to address backlog need and a forecast of future needs for each local authority, its findings will be more relevant for council's Local Housing Strategies and in turn, future land requirements for this sector can be addressed through the respective council's LDPs. It was for this reason that the SDP MIR was able to approve this aspect of the Plan in advance of the HNDA being finalised.

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10

- 5.20 In summary, even using the more optimistic 'Planning Scenario' (refer to paras 5.7/8 above), the HNDA identifies a level of demand in the private owner-occupied and private rented sectors that can be accommodated in the land supply audited for the City Region for all housing market areas, so there is no strategic requirement for additional land release for these sectors. This finding includes the Inverclyde HMA. In relation to the 'Affordable Sector – (intermediate and social rented) – it is expected the outcomes of the HNDA will be reported to the January 2011 meeting of this Committee and a response recommended on behalf of the Council for consideration by the SDPA Joint Committee in advance of the SDP Proposed Plan. This report and its conclusions and recommendations will also form the evidence base for the Council's draft Local Housing Strategy, now expected to be brought before this Committee in May 2011.

A Network of Centres

- 5.21 The city and town centres are fundamental to a sustainable strategy as they are at the core of our communities, serving a wide and diverse range of roles and functions such as business, civic and office administration, retail, leisure, education and heritage, community facilities and residential. Centres as their name suggests are the most conveniently accessed locations in terms of public transport. This centrality and diversity is reflected in the MIR's handling of the City Region's centres, and in a similar approach to strategic business locations, the SDPA Joint Committee has agreed to the

identification of fewer, genuinely strategic centres, with a distinction made between those that perform a 'strategic retailing function' and those that are more broad-based in their range of 'town centre uses'.

Background
Report no.
11

5.22 Glasgow City centre, as the regional core, sits pre-eminently above the other strategic centres, of which Greenock is recognised as one of 11. These centres will be protected and new investment will be directed to them in preference to other town centres, with recognition given to the balance of retail/non-retail uses within these centres. A main issue raised concerns Braehead and its future strategic role, as either a 'regional shopping centre' or a town centre. The SDP MIR suggests that, in time, Braehead will become a town centre and the SDP Proposed Plan should acknowledge this and identify it as one. An alternative view would be to say that it is too soon to conclude this and to await the next review of the SDP in five year's time. The Committee's view is sought on this issue (refer also para 8.6 below).

5.23 In addition to the above, nine other centres are identified in the SDP MIR that are considered to perform a strategic role at sub-City Region level, having in addition to their retail function that serves such a catchment area, a wide range of functions including business employment and civic, educational and community roles. Inverclyde does not have such a centre in the Sub-City Regional network of centres.

Transport

5.24 The SDPA Joint Committee is committed to a SDP that has a development strategy and vision founded on sustainable development principles. This requires a complementary and equally sustainable transportation strategy, promoting a wide range of new investment to encourage greater use of public transport. A key part of this strategy integrating the most sustainable locations with access to public transport infrastructure is 'Transit Orientated Development' (TOD), whereby new development locations are linked into the public transport network and the potential for sustainable travel is maximised. This approach aims to build-on and intensify the urban containment approach embodied in the current approved GCVJSP 2006, with its strategic focus on the 'Central Corridor of Growth (including Clyde Waterfront) and the Community Growth Areas (directly linked to rail stations).

Background
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13

5.25 The integration of land use planning and transport for the SDP is assisted by the outputs of the West of Scotland Conurbation Public Transport Study (a partnership between the GCV councils and SPT), outlining the range of options for future investment in public transport and strategic road improvements within the City Region. The following components are central to this integration and to realising the sustainable objectives of the SDP:

- fixed or heavy rail network (building on the existing network, eg. improvements in capacity for the Ayrshire/Inverclyde rail lines);
- modernised Subway and interchanges with other public transport services;
- light mass transit (including future Tram/Train 'shared running');
- bus services and inter-modal interchange;
- City centre and cross-city travel and interchange; and
- integrated ticketing and inter-modal interchange.

5.26 The full outcomes of the Study and their interaction with priority locations preferred for development are still the subject of ongoing land use and transport modelling, which will inform and provide further justification for the SDP Proposed Plan.

Other Infrastructure – Water and Drainage, and Waste Planning

5.27 The strategic planning requirements for water and drainage infrastructure are already largely addressed through the Metropolitan Glasgow Strategic Drainage Plan (MGSDP), which is a major 'legacy' component of the 2006 GCVJSP. The MGSDP comprises a

wide range of engineered and natural solutions to drainage which are planned to support anticipated levels of demand over the long term across the City Region.

- 5.28 The Scottish Government's 'Zero Waste Plan' (June 2010) seeks to deliver a more sustainable approach to waste and the infrastructure to support it across the country. The planning system has long been identified as having a role to play to achieve this objective through the identification of appropriate locations for waste management facilities. However, the Government guidance and the information required to implement the Plan by City Region is not yet in place so the SDPA has to await the conclusions of further studies on this matter. SEPA, COSLA and the Scottish Government are currently piloting a waste/land use planning project which it is hoped will address this issue and provide greater clarity and certainty in advance of the SDP Proposed Plan.

(e) Main Issue 5 : Tackling Risk – Strategic Development Priorities

- 5.29 The final main issue concerns the ability of all stakeholders involved to realise the aims, objectives and vision of the SDP's Preferred Strategy. An important new element of the Scottish Government's planning ambitions is that SDPs and LDPs are realistic and can be readily implemented. To assist with this, Action Plans are a legislative requirement, to be published with the Proposed Plan, and reviewed every two years. There are at least two fundamental issues (ie. risks) that can already be identified which will determine whether the SDP's vision and objectives can be achieved: the impact of the current economic situation on private sector investment; and planned cuts in public expenditure. Taken together, these factors suggest that prioritisation and phasing of development opportunities will be essential, especially over the short term, to 2016/20.
- 5.30 The position regarding the economy and economic prospects is so critical for the short term that in order to deal with the uncertainty, those stakeholders and partners that are expected to buy into the SDP's Preferred Strategy will need more than in the past, to keep a clear focus on the agreed priorities, and in the context of competing pressures, continue to manage the phasing and sequencing of these priorities in line with available resources. The main issue concerning delivery should not be the absence of a credible development strategy and sufficient land to implement it, but potentially a serious lack of resources and lack of confidence across most development sectors. Until this major constraint on development and investment is overcome, there remains the risk that easier and less resource intensive options for development will be pursued, making it more difficult to maintain and secure for the long term the sustainable urban communities that lie at the heart of the SDP vision.

6.0 IMPLICATIONS

- 6.1 There are no financial, legal or personnel implications arising from this report, nor any implications for other Services of the Council, other than that noted in paragraph 5.20 relating to Safer and Inclusive Communities Service and its responsibility for preparing the Council's forthcoming Local Housing Strategy 2011-2016.

- 6.2 **Equalities:** the report has no impact on the Council's Equalities policy.

7.0 CONSULTATION

- 7.1 **Chief Financial Officer:** no requirement to comment.
- 7.2 **Head of Legal and Democratic Services:** no requirement to comment.
- 7.3 **Head of Organisational Development, HR and Performance:** no requirement to comment.
- 7.4 Consultation has been undertaken with the Safer and Inclusive Communities Service (Strategic Housing Team) in connection with the impact of the delay in finalising and publishing the HNDA Background Report, which provides an evidence base for not only

the SDP MIR but also the Council's forthcoming Local Housing Strategy (LHS) (refer paras 5.18 to 5.20 above). Joint working continues between the two Services on the HNDA and liaison is being maintained on the implications this will have for the timetable of the LHS. A draft LHS is now programmed to be brought before this Committee in May 2011 and in all likelihood, the forthcoming Local Development Plan: Main Issues Report, in May 2011 also (refer to paras 8.1 and 8.7 to 8.10 below).

8.0 CONCLUSIONS

8.1 The following summarises the key issues within the GCV SDP MIR that are of particular relevance to Inverclyde Council and the preparation of its Local Development Plan MIR. As noted however, the March 2011 date in the approved Development Plan Scheme would now appear to be too soon, as the time allowed for the preparation and approval of the GCV SDP Proposed Plan by the Joint Committee in March 2011 now also appears extremely ambitious (refer to paras 8.7 to 8.10 below).

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09/03/10,
para 162**

8.2 In addition to this summary, Annex Two outlines the recommended response to the 26 questions posed in this SDP MIR.

Annex Two

Overall Strategy, Strategic Development Principles and Vision

8.3 *It is recommended* that the overall strategy, the strategic development principles and the vision expressed in the SDP MIR is endorsed, subject to the SDP Proposed Plan outlining in a more explicit manner, the relevance and appropriateness of the SDP to the forthcoming City Region LDPs, by having regard to key intermediate timeframes of the Plan – 2020 and 2025 – in order to provide more direction and guidance for the LDPs. (refer also to Specific Comments below)

The Main Issues

8.4 *It is recommended* that the five Main Issues identified in the SDP MIR for long term sustainable growth are endorsed as being the most relevant and important challenges for a strategic planning document for the Glasgow City Region for the next 25 years.

Preferred Strategy

8.5 *It is recommended* that the principles underlying the preferred sustainable development strategy of the SDP MIR are endorsed, together with the principal geographic and locational outcomes, that is:

- (i) a clustering of economic activity in the City and the region's main towns (agglomeration), served by improved mass transit public transport;
- (ii) urban containment through continuing regeneration and renewal of the urban areas where appropriate, increasing densities of development;
- (iii) environmental recovery through the re-use and re-cycling of vacant and derelict land and buildings (the 'brownfield land resource), for both 'hard' and 'soft' end uses, with increased 'greening' of the City Region;
- (iv) realising the multi-functional nature of the urban and rural environment, to improve the economic competitiveness of the City Region, having regard to 'place-setting', improving access to achieve health benefits for the population, protection of the environment and maintaining biodiversity, and use as a sustainable resource, eg. biomass and wind energy production, aggregates and other raw materials;
- (v) the integration of land use and transport, to encourage greater modal shift from the private car to public transport (with links to (i), (ii) and (iii) above); and
- (vi) sourcing supply locally where practicable and adopting the 'proximity principle' in the choice of development locations to limit the need for movement, of goods and people.

Specific Comments

- 8.6 In addition to the responses to the relevant questions in Annex Two, it is recommended that the following specific comments are endorsed.

(1) Strategic Economic Investment Locations (SEILs)

The SDP MIR includes among its 18 SEILs, 'Inverclyde Riverside' as an 'opportunity location' for business and financial services and distribution and logistics. The latter is inaccurate and should be replaced with 'green technologies', in recognition of its identification as a location suitable for the renewable energy growth sector. The waterfront location at Great Harbour/Inchgreen is being promoted and marketed jointly by the URC Riverside Inverclyde, SEN and the Council, and the landowner Peel Holdings/Clydeport see this as a dual renewables opportunity alongside their other west coast operations at Hunterston, North Ayrshire. *The Council welcomes the identification of the Inverclyde Riverside SEIL in the SDP MIR.*

(2) Housing

(a) The delay in publishing the HNDA, as noted in para 5.19, has meant that a full analysis of its outcomes and its implications for Inverclyde cannot be reported at this stage. A report on this will be placed before the next January 2011 Committee. Notwithstanding the main finding (refer page 43 of MIR, para 6.54), that there is a more than adequate land supply in all housing market areas, including Inverclyde, to meet private sector demand to 2025 under the more optimistic 'Planning Scenario', a detailed analysis of this outcome remains to be done for the Inverclyde Housing Market Area (HMA) and the Renfrewshire (part) sub market of Kilmacolm and Quarriers.

(b) The outcomes for the affordable sector, both intermediate (including low cost home ownership) and social rented housing, as indicated has still to be concluded. Preliminary analysis suggests that with the economic downturn and the decline in demand, and the expected continuing difficulties for households to afford and access owner-occupation, there is likely to be increasing pressure on the social rented sector and also on private rented accommodation, especially over the short term.

(c) The Local Housing Strategy will incorporate the findings of the HNDA in full and in taking this strategy forward, the implications for future land supply across the main housing tenures will be raised as a Main Issue in the forthcoming LDP. One issue that looks likely to require addressing, as it was at the Local Plan Inquiry on the current Local Plan in 2004, is the requirement for affordable housing options in different parts of the authority. An omission in the MIR however (page 43, para 6.55), is a mid-point reference to the year 2016 for the affordable housing sector for the purposes of councils' local housing strategies.

(3) Centres and Retailing

(a) Braehead: the view is expressed in the MIR (refer page 46, para 6.67 and Q.22 (page 49)), that it should be designated as a town centre in the Proposed Plan as its role and function will change sufficiently to be recognised as such over the SDP's planning horizon. This conclusion is considered to be premature. The analysis undertaken demonstrates that Braehead does not meet the definition of a town centre as set out in the Government's Scottish Planning Policy (SPP), being largely retail and leisure orientated. To be recognised as a town centre, Braehead needs to diversify to include more non-retail uses. The significance of designating Braehead a town centre too soon is the impact this would have, through application of the 'sequential test' applied to retail proposals, for other centres in the strategic network, not least Paisley but also potentially Greenock. *It is recommended that Braehead's unique position as a Regional Shopping Centre in the City Region and recognised as such in the GCVJSP should continue to be reflected in the SDP Proposed Plan and a decision on its re-designation as a town centre deferred to the next SDP in five years time.*

(b) Network of Strategic Centres - Greenock: it is acknowledged that in a strategic document the principal or largest town centre is the named centre. However, town centre policy in the adopted Inverclyde Local Plan refers to the complementarities between the three designated town centres in the authority and in particular in relation to comparison shopping. The important role that the extended Port Glasgow town centre plays (and will play) through having land allocated in the Plan, to enable Inverclyde to have a fuller range of modern shopping outlets than otherwise would be the case if it were only Greenock that was counted: *it is recommended this needs to be noted in the final Background Report (no. 11), and that the inclusion of Greenock is welcomed.*

(4) Transport

It is recommended that the need identified in the SDP MIR for improvements to the M8 motorway and improved public transport to aid access to Glasgow International Airport is welcomed and supported. In relation to the West of Scotland Conurbation Public Transport Study (WSCPTS), until this study is concluded, *it is recommended that the Council reserve its position in relation to what would be required to achieve a 'step change' in public transport provision, and what sequencing of transportation improvement priorities outlined in the SDP MIR would be the most desirable.*

(5) Other Infrastructure

Wind Farm Search Areas: the City Region is characterised by significant on-shore wind power potential and has seen considerable wind turbine developments to exploit that resource. The approach already approved for the 2006 GCVJSP and by the SDPA, of identifying suitable locations for wind farms through 'broad areas of search' is supported. The 'broad areas' identified in the SDP (shown on figure 23, page 40 of the MIR), does not include Inverclyde, nor does it affect Clyde Muirshiel Regional Park. In this respect, the recent SPG on Wind Farms undertaken as interim guidance for the Inverclyde Local Plan, is unaffected and *it is recommended that this Council welcomes the approach taken for the new SDP.*

**Min Ref:
09/03/10,
para 163**

(6) Other

(a) The SDP, being the 'upper tier' of the Development Plan – the 'lower' being the LDPs – will need to have within its provisions, a greater degree of clarity including specific policy content, to enable the new generation of LDPs to deliver on the expectations and requirements of the SDP. This is particularly needed at this time of economic uncertainty with the added difficulties this has presented for forecasting and projection work. *It is recommended that it is essential that the SDPA ensures that the SDP Proposed Plan provides more, and necessary, direction and guidance for the preparation of the forthcoming councils' LDPs.* The Proposed Plan will require to have a more specific focus on the three key timeframes for development planning: short (to 2020), medium (2020 to 2025) and beyond over the long-term to 2035.

(b) There is little in the MIR that suggests this necessary level of guidance will be in the Proposed Plan. The City Region LDPs cannot be prepared in a policy vacuum, and in this respect consideration should also be given to 'development thresholds' to guide and provide consistency of approach in each of the eight councils' LDPs.

Next Stages

- 8.7 The final section of the SDP MIR sets out the SDPA Development Plan Scheme for the next stages in the preparation of the SDP: the Proposed Plan. This remains unchanged from that approved by the Joint Committee in March 2010 and submitted to the Scottish Government at that time, for approval in March 2011. Given the manner in which the SDP MIR has been prepared, with first sight of a first draft MIR not made available until one week prior to the senior officer (Heads of Planning) Steering Group, asking for its endorsement and to be placed before the Joint Committee on 13th September, it is essential that sufficient time is allowed for the proper scrutiny of drafts by senior officers on the Proposed Plan, both by member authorities individually and jointly in the working

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structures of the SDPA. If this is to be done, and following meaningful consideration of the responses received to this consultation, it is extremely unlikely that the March 2011 deadline can be achieved.

- 8.8 The SDP MIR has been published with some critical pieces of work, namely some Background Reports, incomplete, including the HNDA, timed to be published in late October during the consultation period. While the timeframe for consultation on the SDP MIR as a whole is generous, for some of the critical background technical work it is insufficient. It is the latter that assists most in understanding the SDP MIR. It is paramount that the SDP DPS is re-examined in the light of these unavoidable delays in the preparation and publication of some important technical background work, and that sufficient time is allowed for this in moving to the next stage of Plan preparation.
- 8.9 *It is recommended* that reconsideration be given by the SDPA Joint Committee to the timetable for the GCV SDP Proposed Plan at its next meeting in December 2010. It is suggested consideration should be given to revising the DPS and putting back the time for Joint Committee approval of the Proposed Plan to at least its meeting in June 2011, to allow for the full and proper consideration by the member authorities of this Plan.
- 8.10 A consequence of any delay in the preparation and approval of the GCV SDP Proposed Plan would mean pushing back the approval date for the Inverclyde Local Development Plan: Main Issues Report to the May 2011 Committee. However, the Inverclyde LDP Development Plan Scheme allowed on reflection a generous timescale between Committee approval in March and publication of the LDP MIR for publication and consultation in May 2011. Re-scheduling the date for Committee therefore should not lead to any further delay in publication since there is confidence that the printing of the MIR can be achieved over this shorter period of some three to four weeks.

9.0 BACKGROUND PAPERS

- 9.1 The Glasgow and the Clyde Valley Strategic Development Planning Authority – Strategic Development Plan: Main Issues Report (September 2010), and all associated reports published with the MIR, including the Strategic Environmental Assessment (SEA) ‘Environment Report’ and 13 Background Reports (listed below), are available as downloads through the GCVSDPAs web site – www.gcvsdpa.gov.uk. The approved 2006 GCV Joint Structure Plan can be similarly sourced.

GCV SDP MIR Background Reports

- BR 1 – Glasgow and the Clyde Valley Joint Structure Plan Monitoring Report
- BR 2 – Vacant and Derelict Land 2009
- BR 3 – Futures : Visioning to 2035
- BR 4 – Greenhouse Gas Emissions in the City Region 2005 – 55
- BR 5 – Economic Outlook and Scenarios for the Glasgow and Clyde Valley City Region
- BR 6 – Projections of Population and Households to 2025
- BR 7 – Strategic Economic Investment Locations (SEILs)
- BR 8 – Glasgow and the Clyde Valley Green Network – Prioritising Delivery
- BR 9 – Wind Farm Search Areas
- BR10 – Glasgow and the Clyde Valley Housing Need and Demand Assessment
- BR11 – Retailing and the Network of Strategic Centres
- BR12 – Urban Capacity Study 2009
- BR13 – West of Scotland Public Transport Conurbation Study

ATTACHMENT

Annex One : Public notice published in the Greenock Telegraph (Friday 8th October and Friday 15th October), amended from original in The Herald (Thursday 30th September 2010)

Annex Two : The Glasgow and the Clyde Valley Strategic Development Plan: Main Issues Report : Inverclyde Council’s Recommended Responses (to the no. 26 Questions Asked)

Head of Regeneration and Planning
Cathcart House
6 Cathcart Square
Greenock

6th October 2010

SSC Cmtee 2010 GCV SDP MIR – IC Resp (Oct'10)

**STRATEGIC DEVELOPMENT PLAN FOR THE GLASGOW AND THE CLYDE VALLEY AREA
NOTICE OF CONSULTATION ON MAIN ISSUES REPORT AND RELATED STRATEGIC
ENVIRONMENTAL ASSESSMENT ENVIRONMENTAL REPORT**

**THE TOWN AND COUNTRY PLANNING (DEVELOPMENT PLANNING) (SCOTLAND)
REGULATIONS 2008**

**THE ENVIRONMENTAL ASSESSMENT (SCOTLAND) ACT 2005: ENVIRONMENTAL
REPORT**

The Glasgow and the Clyde Valley Strategic Development Planning Authority, in exercise of the functions delegated to it by the Councils of East Dunbartonshire, East Renfrewshire, Glasgow City, Inverclyde, North Lanarkshire Renfrewshire, South Lanarkshire and West Dunbartonshire, have prepared a Main Issues Report (MIR) and related Environmental Report for consultation.

The purpose of the MIR is to highlight the key land use planning issues and challenges in such areas as housing, economic development, transport, infrastructure and the environment facing the Glasgow and the Clyde Valley area over the next 20 years. The consultation process is open to everyone and the Strategic Development Planning Authority welcome comments.

The Environmental Report identifies and evaluates the significant environmental effects that are likely to result from the implementation of the Main Issues Report. It identifies any reasonable alternatives and seeks to minimise or mitigate any potential effects on the environment and enhance any positive environmental effects.

Copies of the relevant documentation can be viewed at www.gcvsdpa.gov.uk/mir and have been deposited at every public library in the Glasgow and Clyde Valley area and at the planning offices of the Glasgow and the Clyde Valley Strategic Development Planning Authority and the Councils of East Dunbartonshire, East Renfrewshire, Glasgow City, Inverclyde, North Lanarkshire Renfrewshire, South Lanarkshire and West Dunbartonshire.

The documents are available for inspection during normal office hours free of charge.

Comments on the Main Issues Report and Environmental Report should be submitted by **26th November 2010** to, Dr. Grahame Buchan, Strategic Development Plan Manager, Glasgow and the Clyde Valley Strategic Development Planning Authority, Lower Ground Floor, 125 West Regent Street, Glasgow, G2 2SA or by email to mir@gcvsdpa.gov.uk

For further information please contact 0141 229 7730 or at info@gcvsdpa.gov.uk

ANNEX TWO

Glasgow and the Clyde Valley Strategic Development Plan: Main Issues Report

The Main Issues – Guiding Responses – the Questions (no. 26)

The Legacy

Q.1 *Do you agree with the continuing role of the(se) legacy elements in moving from the previous generation of Structure Plans to the new generation of Strategic Development Plans ?*

Yes, and importantly each of the component parts need to be seen as a coherent sustainable whole and taken forward through the new SDP and respective council's LDPs. However, the legacy elements listed are insufficient in themselves (refer to Q.2).

Q.2 *If not, in your view, which legacy elements need incorporation from the previous generation of Structure Plans into the new generation of SDPs ?*

As important for the success of the new City Region Development Plan will be the carry-over of other legacy elements from the 2006 GCVJSP, in particular, a clear policy content and other guidance (eg. Green Belt policy and the specification of 'thresholds' in relation to developments that are defined 'strategic'). It is only through prescriptive policy at the 'upper tier' of the Development Plan to assist in the consistent and comparable preparation of the eight councils' LDPs that the overall aims, objectives and indeed vision of the SDP can be achieved.

Strategic 'Drivers of Change'

Q.3 *Do you agree that the six 'drivers' set out (in this section) are the key 'change' forces around which revolves the City Region's future to 2035 ?*

Yes, however if there is one certainty in life, it is change. As far as we can judge at the present time, the six 'drivers of change' are a robust and meaningful basis for the purposes of strategic planning as we could devise, however, given under The Planning etc. (Scotland) Act 2006, the SDP will be reviewed in five year's time, then this like other elements of the SDP can be revisited.

Q.4 *Can you identify other such key 'drivers of change' that should be taken into account in shaping the future SDP ?*

Given the answer to Q.3, not necessary as can be reviewed in five year's time.

Vision and Principles

Q.5 *Do you agree with the vision (as set out), for the future long-term development of the City Region ? If not, what coherent spatial vision would you advocate ?*

Yes, and supplementary n/a.

**Q.6 Do you agree that the development principles (set out here) provide the foundation for framing a sustainable SDP strategy ?
If not, which principles should the GCVSDPA adopt ?**

Yes, and supplementary n/a.

Main Issues and Key Challenges

Q.7 Do you agree that the GCVSDPA, in terms of a 'Growth Agenda' for the SDP, should use the 'Planning Scenario' with its assumptions about higher net in-migration and a faster-growing economy ?

Yes on balance in order to provide sufficient flexibility in the land supply but not so much as to undermine the primary aims and objectives of the Plan, and its founding development principles. Issue 5 is also fundamental to the choice of the 'Planning Scenario'.

It is acknowledged for the purposes of the MIR that this is the most appropriate scenario to adopt, however, the MIR lacks a clear 'road map' or 'path way' as to how, if the economic growth that is anticipated does not materialise by 2020 or even 2025, what requires to change in the SDP. While it could be the position that a review in five year's time will deal with such an outcome, it is argued that the Proposed Plan will have to provide more direction and guidance for the LDPs, for the short (to 2020), medium (2025) and long-term (post 2025) timeframes of the SDP than is currently evident in the MIR. This requirement of the SDP Proposed Plan is particularly relevant to the meeting of housing requirements, both need and demand.

Q.8 Do you agree that the five overarching main issues (as set out) should be the basis of the SDP in terms of long-term sustainable growth and the delivery of the Plan ?

Broadly yes, but for Main Issues 1 and 4, and having expanded on the potential contrasting outcomes depending on the mix under Main Issue 5 (refer below), more needs to be said in the Proposed Plan about what the specific land use planning implications are: first for Main Issue 1 in terms of the regional development geography across central Scotland; and second, as noted under Q.7, the geography of preferred development locations within the City Region, over the three time periods noted. In this respect, there is an absence of viable alternatives raised in the SDP MIR, rather a somewhat simplistic 'black' and 'white' dichotomy of what is 'sustainable' or not. This statement is made without a full reading of the Environmental Report.

Main Issue 1 –'Breaking Down Distance to Economic Markets'

Q.9 Do you agree that early planning for 'High Speed Rail', with a terminus in central Glasgow, connected to an integrated sustainable public transport network, with effective links to Glasgow International Airport and to the rest of the City Region, is an essential component for the SDP in the period to 2035 ?

Yes, and to be advocated by the GCVSDPA and others for its implementation much sooner than what appears to be a far too pessimistic timeframe indicated in the MIR. HSR is already a major contributor to economic growth and the reduction in disparities of wealth across Europe and in this respect the UK is lagging far behind. It is also essential

to maintain credibility for the SDP's sustainable claims, rather than accepting without question the case for continued air transport growth, including for internal UK travel.

Q.10 Do you agree that action needs to be taken to address accessibility to Glasgow Airport through improved public transport and through improvements to the M8 motorway in its vicinity ? If so, what type of action would you suggest ?

Yes, particularly with respect to public transport. However, there is an absence of direction in regard to the Glasgow Airport Rail Link (GARL): the text is vague, figure 16 does not include it, but figure 27 does and, the Background Report (No.13) is silent on this issue. In view of the Scottish Government cancelling the rail link to Glasgow Airport, a statement needs to be made on its future, either if the SDPA agrees with it as not being considered cost effective or whether over the timeframe of the Plan it would be the preferred option. With respect to potential alternatives, a dedicated quality bus corridor on the M8 from the City Centre could be one, or should efforts be concentrated upon improved links from Paisley Gilmore Street Station to the Airport by means of light rail or bus. In addition, as suggested, improvements are also required to the M8, especially in the vicinity of the airport.

Q.11 Do you agree that in seeking to develop the City Region's economy, improving its wider competitiveness, stronger collaboration with Edinburgh City Region is essential ?

Yes, experience in Europe demonstrates as the MIR suggests that the Glasgow City Region acting alone is not sufficient in itself to compete on a EU or global scale. In addition, as indicated above under Q.8, more detail will have to be provided in the Proposed Plan in terms of what this stronger collaboration will mean for land use planning and development priorities, if any, in the GCV.

Main Issue 2 – 'Supporting a Sustainable Economy'

Q.12 Do you agree that the GCVSDPA should plan for the long-term City Region economy on the basis of a continuing shift to a service sector based economy as forecast by Oxford Economics and both the Scottish Government's and Scottish Enterprise's strategy of rebalancing the economy through supporting new economic sectors ? If not, what economic approach would you advocate and why ?

Broadly yes, but there has been considerable work done which suggests that the UK economy already is too skewed in favour of the service sector. The case has been made by Oxford Economics that the service sector should be planned for, but equally there is a well-argued view that we need a more balanced economy with a need to invest in high-value 'niche' manufacturing, with an emphasis on 'green' and renewable technologies. The MIR refers to this prospect, so in acknowledging that future jobs are likely mainly to continue to come through service sector growth, the importance of this more balanced approach should not be underestimated, underplayed or undervalued in the Proposed Plan. What follows in stating this is the question: is there sufficient recognition given to this in the work done to select the SEILs ? Are the selected locations sufficiently flexible to accommodate possible future alternative sector growth, in terms of location, size and/or built form, and adaptable enough to meet variable requirements that may emerge over the longer term ?

Q.13 Do you agree with the approach of the GCVSDPA in promoting a list of key strategic locations to support the City Region economy for the long term ? If not, what alternative approach would you suggest as more appropriate ?

Yes, but with the proviso stated above in relation to having the balance of locations and sites to provide for a broader spread of potential growth sectors. The approach additionally does allow for a focus on current priorities, while still allowing LDPs to identify other local priorities.

In relation to Inverclyde's 'opportunity location' of 'Riverside' (currently identified in the 2006 GCV JSP, extending over 'Cartburn' and 'Greenock/Port Glasgow SIBLs), the growth sectors noted are inaccurate: 'Distribution and Logistics' should be replaced with 'Green Technologies', the latter noted above in Q.12 to reflect the promotion of the 'green technology' and renewable energy growth sectors as an identified opportunity at this location. This recognition is being jointly promoted by the URC Ri, SEN and the Council, specifically for its waterfront site at Great Harbour/Inchgreen. In addition, this location is being marketed with the main private landowner, Peel Holdings/Clydeport, alongside their other major potential location on the west coast at Hunterston, North Ayrshire, for a similar mix of renewables sector research and development and for manufacture.

Main Issue 3 – 'Promoting Environmental Action – An Economic Necessity'

Q.14 Should the SDP identify and promote a positive action-based Green Network Strategy, in partnership with a wide range of stakeholders ? If not, what alternative focus should the SDP adopt ?

Yes, as a continuation of current best practice with a focus on demonstrating the value of project work on the ground as being the most effective way to realise the Green Network Partnership's aims and objectives.

Q.15 Should the GCVSDPA pursue a strategy of prioritisation to drive forward delivery of the Green Network Strategy ? If not, what alternative approaches would you advocate ?

Yes, following on from Q.14, this is essential. In relation to Inverclyde, there are a number of issues concerning the detail outlined in the Background Report (No.8).

Q.16 Should the SDP continue with a Green Belt designation ? If not, what alternative approach should the GCVSDPA adopt ?

Yes, the Green Belt remains the most successful and widely recognised 'planning tool' and is the most effective policy in the Development Plan to control the spread of development into the countryside and direct it in a way which assists greatly urban containment. Going forward, it should assist greatly the SDP's key development principles of: agglomeration, increased density where appropriate, the maximising of land renewal and re-cycling of brownfield land and, the complementary emphasis being given to Green Network projects.

Having said that, a case can be made along certain strategic transport corridors for optimising the potential of some locations to contribute to meeting the demands identified in the Plan, especially future housing requirements. In this respect the legacy

element of the 'Community Growth Areas' in the SDP justifies adjustments to the Green Belt to accommodate long term development requirements, post 2020.

Q.17 Should the GCVSDPA pursue the search area model:

(a) to guide the development industry and communities as to potential long-term future development opportunities; and

(b) to provide local authorities with a strategic framework within which to address detailed local planning issues ? What alternative model could GCVSDPA consider in terms of planning for major environmental developments ?

Yes (to both (a) and (b)), and there is no need for an alternative. The search area model provides a clear strategic policy framework for the planning of wind farms, and establishes clear guidance for Inverclyde and Clyde Muirshiel Regional Park.

Q.18 In terms of minerals development, do you agree with the GCVSDPA that the existing programme of surface coal extraction needs no further strategic planning context?

Agree.

Q.19 Should the GCVSDPA seek to define search areas for sand and gravel extraction, in spite of the quality of data available for this approach being questioned ? If not, what approach would you advocate ?

Yes, search areas would be the best approach to assist with forward planning and adhering to the 'proximity principle'. If the problem with the data is the lack of information on quality, there would still be some use in having the search areas to direct developers towards the closest location and then progressively further afield if the quality required is not available.

Main Issue 4 – 'Promoting Sustainable Locations for Development'

Q.20 Should the GCVSDPA, despite generous allocations of land for future housing, consider release of additional land in less sustainable locations to accommodate the short-term impact of the current economic recession on the housing market ?

No, there is a more than adequate housing land supply (both 'effective' and 'established') to meet estimated private sector housing requirements to 2025, even on the most optimistic 'Planning Scenario', and while the full scale of the requirement for the 'affordable sector' - comprising intermediate housing products and the social rented sector – remains to be concluded, it is generally considered that there will be more than sufficient land within the existing urban area in sustainable locations to accommodate these housing requirements.

The eight council's LDPs will in time bring forward sites and identify any new land required to meet the demand and need in all tenures, once the work on the GCV HNDA has been concluded and incorporated into the Proposed Plan. The assessed housing requirements will be taken forward in the eight council's Local Housing Strategies and any further required joint working across housing market areas can be entered into at that stage to address any outstanding requirements for affordable homes, including Low

Cost Home Ownership (LCHO). In addition, if there are exceptional circumstances where a short term, less sustainable release is required, this can be demonstrated at a local level through the LDP.

Q.21 *The GCVSDPA prefers an option to identify a limited number of strategic centres; yet there are other options – to focus solely on the City Centre or perhaps to adopt a wide-ranging network of centres, both of which have different implications for investment. Is the GCVSDPA’s approach the most sustainable option ?*

Yes, as the approach focuses development in the centres that already have a strong retail function rather than creating a large number of competing centres within the same catchments and localities. This will allow neighbouring centres in the network to work in a complementary way while providing the scale needed to plan for strategic retail investment in the identified centres. This approach should guard against people travelling between a number of similar centres in order to access all their retail requirements. Focusing on a limited number of centres, rather than only the City Centre, also allows for a reduction in travel in terms of distance and time for people shopping within the SDP area.

However, it is difficult to see any significant difference between the roles of centres 1-11 and 12-20 in regard to ‘retail’ and ‘employment, etc’. illustrated in figure 26. Emphasis, certainly in the MIR should be mainly on retailing, as other town centre functions (employment, civic, leisure, etc.) are less subject to change in terms of land use. Guidance in the SDP is needed for retail, less so for other uses. [Note: para 6.61 is incorrect – refers to 11 other centres; should be 10].

Q.22 *Braehead is not currently identified as a town centre but on the basis of the analysis there is a view that it should be designated as a town centre. Is this a valid view?*

The analysis of Braehead’s role and function in the Background Report, page 32, and figure 21, indicates that it is retail and leisure oriented. On this basis, it does not currently meet the definition of a town centre as set out in SPP.

The issue of Braehead – its designation and place in the sequential test - should be subject to scenario testing to determine what impact this would have on other centres in the network. As Braehead is already dominated by retail uses, it is not necessarily an issue if new strategic retail floorspace is directed to the strategic town centres in the first instance as this would allow them to consolidate their retail offer while allowing at the same time Braehead to diversify.

To be recognised as a town centre, Braehead needs to diversify to include more non-retail uses and if the SDPA feel that this should be encouraged, then it should be planned for. New development planned around Braehead, particularly new housing, means that in future it may have more of a local catchment of its own to serve. However, a decision to change Braehead’s designation on this basis alone should be deferred to the next SDP in 5 years time, since the current economic conditions suggest that the adjacent development may not come forward as quickly as originally anticipated.

Braehead is not a town centre currently and is unlikely to be so over the short term, so its unique position in the GCVJSP should be reflected in the SDP Proposed Plan.

Q.23 Given the clear need to address waste in a future sustainable City-region vision, but given also the real data difficulties with this subject and its inherent complexity, do you support the GCVSDPA's view that strategic planning for waste need a national drive to address the evidence base of that planning ?

Yes, it is necessary to know the need for, and the required capacity of, the new waste facilities before locating them and investing in them.

Q.24 Should the City Region focus on a step-change in public transport provision of the type set out in the West of Scotland Conurbation Public Transport Study (WSCPTS) within the plan period ?

Yes, as there is no obvious alternative. However, until the WSCPTS is concluded, it is difficult to be precise in relation to the priorities for implementation stated in the MIR. It is also unclear what is meant by a 'step-change'.

The WSCPTS was extensive and detailed investigation has been undertaken into how the City Region's transport system could be adapted on an incremental basis up to 2025. The frequencies noted in figure 28 of the MIR are based on providing a 'turn up and go' service which is seen to be required to attract people onto public transport. The study recommends that a higher priority should be given to providing sufficient and timely information to enable passengers to make informed choices about their journey. However, these recommendations appear to be more incremental than a 'step change', and presumably require further assessment of cost, feasibility and environmental impacts.

For purposes of clarity, the WSCPTS area as shown on the map (figure 27, which incidentally shows the heavy rail route of GARL – is this correct ?), does not include internal trips within Inverclyde and other areas, as the focus of the Study is on trips into the central area of the City Region from 'outlying' areas. The outcomes noted include recommendations that would have significant benefits to these areas, if implemented. Insofar as the Study also looked at how different transport types could operate in an integrated way to improve the transport network, with different types of vehicles and service frequencies suited to different ranges of passenger demand and the analysis of future demand along transport corridors, this suggests the 'step change' referred to would require all these innovations to be introduced and over a relatively short time period. How realistic is this ?

Main Issue 5 – 'Tackling Risk – Strategic Development Priorities'

Q.25 What should the GCVSDPA do to mitigate the risk to its sustainability-based strategy in the face of market and financial pressures – do you agree with the process of prioritisation ?

In order to mitigate risk, the SDPA needs to ensure that the SDP Proposed Plan provides the necessary direction and guidance for the preparation of the eight council's LDPs. To do so, the Proposed Plan will require to have a more specific focus on the three key timeframes for development planning: short (to 2020), medium (2020 to 2025), and beyond over the long-term to 2035. The SDP, being the 'upper tier' of the Development Plan – the 'lower' being the LDPs – will need to have within its provisions, a greater degree of clarity including specific policy content, to enable the new generation

of LDPs to deliver on the expectations and requirements of the SDP. There is little in the SDP MIR which suggests that this necessary level of guidance will be forthcoming in the Proposed Plan, but it will have to be built-in to assist the eight LDPs in the City Region. LDPs cannot be prepared in a vacuum, and returning to the SDPs legacy, the response to Q.1 and Q.2 are relevant to this mitigation of risk.

This absence of detail is particularly the case in relation to housebuilding, given this is the largest user of land and the development sector around which much else operates. If the economic downturn is more prolonged than currently forecast (ie. beyond 2020), then there will be a serious question raised (around the time of the next SDP review, if not before), over the relevance of the CGAs to meeting housing requirements. If that is the case, then a more considered approach, one based on the Plan's sustainable development principles across the full established land supply will be required, in order to provide guidance for the emerging LDPs.

Q.26 In responding to the current economic situation and expected dampening of demand and growth to 2020 or beyond, should the GCVSDPA adopt a lesser level of sustainable development in its strategic vision and aims, despite all the 'drivers of change' pointing to a need for an even more sustainable future ?

No, with land supplies as they are due to the economic downturn and the expected continuation of lower levels of demand, at least over the short term, these combined circumstances provide the opportunity to re-focus and re-balance the economy and society away from its historic dependence on a 'growth path' that if continued, will be inherently unsustainable. A sustainable future for the City Region requires a more targeted and focussed approach to the geography of development, one that is even more sustainable than has been countenanced in the past. The continuing difficult economic circumstances provide the opportunity to pursue such a future with more resolve, not less.

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