

Issue 06	Network of Strategic Centres	
Development plan reference:	Section 6 City Region as a Successful, Sustainable Place - Network of Strategic Centres	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>East Ayrshire Council (PP02) Overtown and Waterloo Community Council (PP07) Police Scotland (PP16) SEPA (Scottish Environment Protection Agency) (PP23) Councillor Ralph Barker (PP30_02) Intu Shopping Centres Plc (PP31_01) (PP31_02) (PP31_03) Colony Capital (PP36) NewRiver Retail (PP48) Strathclyde Partnership for Transport (PP52_08) (PP52_09) Retail Property Holdings Ltd (PP58_01) (PP58_02) (PP58_03) (PP58_04) (PP58_05) (PP58_06) British Land Company plc (PP55_01) Scottish Government (PP57_09) (PP57_10) Land Securities (PP63)</p>		
Provision of the development plan to which the issue relates:		
<p>Spatial Development Strategy (pages 24-28) Network of Strategic Centres - paragraphs 6.1-6.10 (pages 30-32) Diagram 3 Network of Strategic Centres (page 31) Policy 4 Network of Strategic Centres (page 32) Schedule 2 Network of Strategic Centres (pages 33-38)</p>		
Planning Authority's summary of the representation(s):		
<p>Network of Strategic Centres - Paragraphs 6.1-6.10 (pages 30-32)</p> <p><u>East Ayrshire Council (PP02)</u></p> <p>The development of Pollok is having a detrimental impact on town centres such as Kilmarnock. The inclusion of Pollok/Silverburn as a Strategic Centre in the Clydeplan SDP and the further expansion of the centre will continue to impact on areas outwith the conurbation.</p> <p><u>Intu Shopping Centres Plc (PP31_01)</u></p> <p>Paragraph 6.9 is misleading with regards to statements on recent investment in Braehead. The only investment has been that which would typically be expected in order to manage and maintain an asset that is over 15 years old.</p>		

Retail Property Holdings Ltd (PP58 01)

The reference to the Scottish Planning Policy town centre first principle is fully supported, but clarity is needed as to how it applies to the centres identified. The apparent interchangeable use of the terms 'strategic' centre (6.1, 6.2, 6.5) and 'town' centre (6.3) lacks clarity and is misleading. It implies that the Scottish Planning Policy town centre first approach applies to all strategic centres when in reality this is clearly not the case given the status of Braehead as a commercial centre.

Retail Property Holdings Ltd (PP58 01)

The clear reference to the Scottish Planning Policy town centre first principle is fully supported, but clarity is needed as to how it applies to the centres identified. A separate statement regarding Braehead and its place in the network noting its status as a commercial centre is required.

Land Securities (PP63)

The section fails to recognise Scottish Planning Policy and the recognised network of shopping centres which deems to put all strategic centres on an equal footing. There is concern that the designation of a network of strategic centres has not undertaken at this SDP level.

Paragraph 6.9 does not put enough emphasis on the potential negative impact out-of-centre retailing is having on Glasgow City Centre and this should be recognised in the SDP. Whilst Paragraph 6.10 confirms that the "City Centre's role to be safeguarded by Local Authorities via their Local Development Plans, this should be presented initially.

Schedule 2 Network of Strategic Centres (pages 33-38)

Overtown and Waterloo Community Council (PP07)

Supports the recognition of the 'challenges' identified in Schedule 2, Network of Strategic Centres with regards to Wishaw Strategic Centre.

SEPA (PP23)

The issue of air quality has been omitted as a challenge for those Strategic Centres which are subject to Air Quality Management Areas (AQMAs) and should be added where applicable. The issue of flood risk has been omitted as a challenge for those Strategic Centres where this has been identified in the Clydeplan Strategic Flood Risk Assessment and should be added where applicable.

Colony Capital (PP36) and NewRiver Retail (PP48)

Both support the regeneration of Paisley Town Centre including the need to address vacancies and diversify the existing offer to encourage visitors back to the Centre. Retail and leisure uses remain an important part of this strategy and must

not be overlooked. There should be a concrete assertion in the plan that retail development should continue to be welcomed in Paisley Town Centre and will work in tandem with the other civic and cultural uses which are planned for the town.

Colony Capital (PP36)

Recognise the contribution that Braehead could make to realising the City Region's strategic ambition to regenerate Renfrew Riverside. This needs to be weighed in the balance against the potential impacts such a proposal could have Paisley Town Centre. No assessment of the alternatives (which should have been undertaken as part of the Main Issues Report) appears to have been undertaken which is of significant concern as Braehead Centre continues to assert an influence over shopping patterns in the sub-region with implications for investor confidence. The Proposed Plan commits to a review of the status of Braehead and should specify how this is to be achieved and the rationale for this. If it is seeking to include a much wider range of town centre uses, then this will have implications for neighbouring centres whose current and only differentiating offer is to provide a wider range of town centre uses over and above that of retail and leisure.

NewRiver Retail (PP48)

Understand that Braehead plays an important role in the city region and also requires attention and renewed investment for its future. But believe that some of the actions listed in this Proposed Plan for Braehead will have a significantly detrimental effect on Paisley; as well as limiting the impact of the future actions listed for Paisley Town Centre may have. The future actions for Braehead need to be reconsidered due to the fact that many of these proposals will impact negatively on the vitality and viability of Paisley Town Centre.

Strathclyde Partnership for Transport (PP52_08)

Recognition of the wide range of uses (beyond retail) that can support town centres, particularly the opportunity to provide more residential properties, as set out in 6.3, should be reflected in Schedule 2, Network of Strategic Centres.

Strathclyde Partnership for Transport (PP52_09)

The reference to "limited public transport accessibility" in relation to challenges for Kirkintilloch is misleading as it is a key destination for local bus/express bus services connecting directly to Glasgow with regular and frequent bus services serving the town centre. It is therefore assumed that the reference is to physical access to bus stops related to the delivery of the masterplan for the town centre.

Retail Property Holdings Ltd (PP58_04)

The challenges and future actions relating to Braehead fail to recognise its status as a commercial centre, something that is referenced under 'Status'. Continued investment should only be secured as an option if such investment cannot be directed to town centres in the network in the first instance. The suggested approach is not consistent with Scottish Planning Policy. The sequential approach

in Scottish Planning Policy is not reflected in these challenges and actions. The inclusion of 'retail' under challenges and also future actions is presumptive regarding the outcome of a future sequential assessment. The challenge at the second bullet would appear to be 'to strengthen urban character' with the action being the provision of a range of uses to enhance its offer and quality of place. The text in the plan should be amended accordingly. The challenge at the third bullet point would appear to be 'quality of public realm' with the future action being its enhancement. The plan would appear to be ascribing a town centre status to Braehead by stealth e.g. the reference to the development of a Braehead 'Centre' Strategy and Action Plan. Braehead's future status (the final bullet point under 'future actions') is a matter to be considered by all neighbouring local authorities, stakeholders and interested parties through the proper development plan process. The schedule is inappropriately pre-empting this process by implying that Braehead's status may change.

Scottish Government (PP57 10)

Apparent inconsistency between Diagram 3, Network of Strategic Centres, which shows spatially the network of strategic centres, and Schedule 2, Network of Strategic Centres. It is also unclear why the names of the majority of the 23 strategic centres are shown on the map, but that this has not been done for specific numbers; 13, 23, 9, 18, 19, 20 and 22 whereas the names of some of the non-strategic centres do appear on the map.

Land Securities (PP63)

The Schedule should be providing clear guidance that out-of-centre retail parks (whether town centres or not) should not be allowed to have a detrimental impact on Glasgow City Centre nor should they be allowed to grow exponentially.

Policy 4 Network of Strategic Centres (Page 32)

Intu Shopping Centres Plc (PP31 02)

The policy runs counter to principles established in the Scottish Planning Policy in respect of the Development Plan's role in prescribing the circumstances when policy tests of the sequential approach and impact are to be applied. It makes clear that the tests of the sequential approach and impact are to be applied to proposals in edge or out of centre locations where the proposals are contrary to the development plan.

Colony Capital (PP36)

In line with the Scottish Planning Policy requirement and in view of the shifting emphasis on retail at Braehead, there is an expectation of a sequential assessment as part of the supporting evidence. There is no evidence of a sequential assessment being undertaken or any wider consideration of the implications of the proposed expansion of Braehead to include retail uses.

Strathclyde Partnership for Transport (PP52 08)

Recognition of the wide range of uses (beyond retail) that can support town centres, particularly the opportunity to provide more residential properties and this should be reflected in the policy.

Scottish Government (PP57 09)

Whilst there is reference to Scottish Planning Policy's sequential approach, in terms of the assessment of the impact of such proposals it could be interpreted that this is limited to impacts on other Strategic Centres in the network and consequently that an assessment of the impact on other town centres which are not strategic centres is not required. However, a strategic development could have a significant impact on the vitality and viability of smaller town centres and it is important that these impacts are taken into account in the planning process. As currently drafted the policy could be seen as giving priority to the impacts on a commercial centre over those on town centres **(RSD04)**.

Retail Property Holdings Ltd (PP58 03)

The associated reasoned justification at paragraphs 6.7- 6.10, and the Schedule should reflect the differing status of Braehead relative to the other centres, and the implications of this for investment and planning decisions relating to the location of retail developments and other town centre uses. The policy distinguishes the City Centre from the other centres, but not the differing status of the others i.e. Braehead. Bullet point three should emphasise that town centres are sequentially preferred to other locations (such as commercial centres) within the network.

Land Securities (PP63)

Policy 4, Network of Strategic Centres (last bullet point) does make reference to the sequential approach set out in Scottish Planning Policy however it is felt that the Strategic Centre role is confusing and the perception that strategic centres have an equal status in policy terms remains despite this statement in policy.

Chapter 6 of the Proposed Plan fails to recognise Scottish Planning Policy and the recognised network of shopping centres which again, deems to put all strategic centres on an equal footing. Policy 4 states that "it is recognised that the social significance of Glasgow City Centre sets it apart from all other strategic centres" however there is no vehicle for ensuring the protection of Glasgow City Centre particularly given the impact the City Centre is experiencing from out-of-city retail parks and this is evidenced in the Appendix B of the Proposed Plan Background Report 5 **(RSD05)**.

Diagram 3 Network of Strategic Centres (Page 31)

Scottish Government (PP57 10)

Perceived inconsistency between the base map locations identified in Diagram 3 and those Strategic Centres identified in Schedule 2, Network of Strategic Centres.

'Strategic Centre' terminology

Retail Property Holdings Ltd (PP58_05) and Land Securities (PP63)

The Plan refers to 'strategic' centres, a term which has no basis in Scottish Planning Policy, which lacks clarity and is misleading. It appears to assume that Strategic Centres equate to Town Centres which is not the case, given that Braehead Shopping Centre is a Commercial Centre and sits below Town Centre in the hierarchy

Spatial Development Strategy

Retail Property Holdings Ltd (PP58_05)

It is not consistent with Scottish Planning Policy where it refers to 'strategic' centres, a term which has no basis in Scottish Planning Policy and would appear to have been used so as to enable the inclusion of Braehead, a commercial centre and therefore subordinate to all of the other named centres, particularly with respect to retail and leisure development.

Miscellaneous

Police Scotland (PP16)

In the City Centre's 'Future Actions' section of Schedule 2, Network of Strategic Centres there is no recognition of Greater Glasgow Division's Road Safety Governance Group's priorities to reduce fatalities caused by road traffic collisions and influence driver behaviour.

Councillor Ralph Barker (PP30_02)

Lanark needs good transport links and all measures should be taken towards a direct train service from Lanark to Edinburgh. The details to be decided by strategic appraisal guidance as referenced in the South Lanarkshire Council Local Transport Strategy 2013-2023 **(RSD06)**.

Intu Shopping Centres Plc (PP31_03)

Schedule 2 of the Proposed SDP sets out the list of Strategic Centres in the Clydeplan area, confirming their "Status", "Role and Function", "Challenges" and "Future Actions". In relation to the final column, "Future Actions" this heading does not correlate with the subtext contained in paragraph 6.6. This text refers to these as being "interventions" in both the first and second sentences in Paragraph 6.6, rather than "Future Actions".

British Land Company plc (PP55_01)

Broadly supports the logic and purpose of a Network of Strategic Centres but it fails to offer any guidance as to the intentions for other centres. Would like to see more specific policy advice about the role of other centres not deemed Strategic Centres.

Evidence base (Background Report 5)

Colony Capital (PP36)

Request that the supporting evidence is updated to outline the rationale for including retail uses as part of the proposed Future Actions for the Braehead Centre. This should include confirmation that reasonable alternatives to promoting the expansion of the centre to include retail uses have been considered and the reasons for rejecting these alternatives. This should also include a sequential assessment as part of the supporting evidence.

Retail Property Holdings Ltd (PP58_04)

NSLSP data is 'broad brush' and insufficiently fine grained to allow a detailed analysis of shopping patterns at a local level. This analysis should be updated to reflect the availability of more recent data published by NSLSP since 2012.

Land Securities (PP63)

The data presented to inform the network of strategic centres is out of date and the strategy lacks any robust justification particularly as no retail capacity assessment is presented.

Modifications sought by those submitting representations:

Network of Strategic Centres - Paragraphs 6.1-6.10 (pages 30-32)

Intu Shopping Centres Plc (PP31_01)

Delete reference to Braehead from paragraph 6.9

Retail Property Holdings Ltd (PP58_01)

Proposed amended wording as follows:

- Page 30 - delete 'strategic' from the section title;
- Paragraph 6.1 - exchange 'strategic' for 'town' in the first two sentences;
- Paragraph 6.2 - exchange 'strategic' for 'town' in the first sentence;
- Paragraph 6.3 - additional sentence noting Braehead as a commercial centre and its place in the network/hierarchy consistent with Scottish Planning Policy;
- Paragraph 6.4 - delete 'strategic' in the first sentence;
- Paragraph 6.5 - delete 'strategic' in the first sentence;
- Paragraph 6.6 - delete 'strategic' in the first sentence;
- Page 31 - delete 'strategic' from the title of Diagram 3, Network of Strategic Centres.

Land Securities (PP63)

No specific change sought. Land Securities would like to re-iterate their concern that the designation of a network of strategic centres is not undertaken at this SDP level. Chapter 6 should be amended to reflect this proposed change.

East Ayrshire Council (PP02)

No specific changes sought.

Schedule 2 Network of Strategic Centres (Pages 33-38)

Overtown and Waterloo Community Council (PP07)

No specific change sought

SEPA (PP23)

Air quality should be identified as a challenge for the Strategic Centres which are subject to Air Quality Management Areas (AQMAs). Flood risk should be identified as a challenge for those Strategic Centres where this has been identified in the Clydeplan Strategic Flood Risk Assessment

Colony Capital (PP36)

Request that further emphasis is placed upon the importance of retail and leisure uses to support the ambitions of the Paisley Town Centre Heritage Asset Strategy. Support for these types of uses should be regarded as a Future Action in Schedule 2 of the Plan.

Would request that the supporting evidence is updated to outline the rationale for including retail uses as part of the proposed Future Actions for the Braehead Centre. This should include confirmation that reasonable alternatives to promoting the expansion of the centre to include retail uses have been considered and the reasons for rejecting these alternatives. Moreover, in line with the SPP requirement and in view of the shifting emphasis on retail at Braehead, we would expect to see a sequential assessment as part of the supporting evidence. There is no such evidence of this sequential assessment being undertaken or any wider consideration of the implications of the proposed expansion of Braehead to include retail uses. We request that this is undertaken prior to the plan being progressed any further.

NewRiver Retail (PP48)

The 'Future Actions' for Paisley within Schedule 2, Network of Strategic Centres the following be included: "In line with encouraging a range of uses, retail uses should continue to be supported in the Town Centre".

Within 'Schedule 2 Network of Strategic Centres' under Braehead Future Actions, the following line should be removed from this proposed plan: "based on ongoing

monitoring of investment activity and health checks review and consider the status of Braehead”.

Retail Property Holdings Ltd (PP58_04)

Page 33 - delete ‘Strategic’ from the Schedule title;
First column header - delete ‘strategic’.

Braehead - Challenges

- Bullet 1 - additional text to clarify that additional investment should only be secured as an option if such investment cannot be directed to town centres in the network in the first instance.
- Bullet 2 - amend to ‘to strengthen urban character’.
- Bullet 3 - amend to ‘quality of the public realm’.

Braehead - Future Actions

- Bullet 1 - delete ‘centre’ and add ‘and monitor’ after ‘Plan.’
- Bullet 2 first sub-bullet - amend to ‘a range of uses to enhance the existing offer and employment opportunities’.
- Bullet 3 - delete bullet point

Strathclyde Partnership for Transport (PP52_08)

Include reference to residential as appropriate.

Strathclyde Partnership for Transport (PP52_09)

With reference to bullet 3 in Challenges for Kirkintilloch rewording to clarify the meaning of limited public transport accessibility is required. Without understanding the intent behind this statement it is not possible to suggest an amendment.

Scottish Government (PP57_10)

There should be consistency between Diagram 3, its key and the centres listed in Schedule 2, Network of Strategic Centres

Land Securities (PP63)

Schedule 2 should include limits on floorspace for certain centres such as Silverburn which are evidenced within BR 5 to be growing at a rate which is clearly having an effect on Glasgow City Centre and other strategic centres.

Policy 4 Network of Strategic Centres (Page 32)

Intu Shopping Centres Plc (PP31_02)

Policy 4 third bullet point

- add 'and where' after strategic scale development
- add 'are contrary to the development plan they' after such proposals

Colony Capital (PP36)

Moreover, in line with the Scottish Planning Policy requirement and in view of the shifting emphasis on retail at Braehead, we would expect to see a sequential assessment as part of the supporting evidence. There is no such evidence of this sequential assessment being undertaken or any wider consideration of the implications of the proposed expansion of Braehead to include retail uses. We request that this is undertaken prior to the Proposed Plan being progressed any further.

Strathclyde Partnership for Transport (PP52_08)

add additional bullet - promotes residential populations within town centres

Scottish Government (PP57_09)

In Policy 4, Network of Strategic Centres, the final bullet point insert additional wording 'and town centres' after 'network' and before 'to'

Retail Property Holdings Ltd (PP58_03)

- Paragraph 6.9 - delete 'strategic' from first sentence.
- Paragraph 6.9 - additional sentence specifically referring to Braehead's role and function as a commercial centre.
- Policy 4, Network of Strategic Centres- delete 'strategic' from the title.
- Policy 4, Network of Strategic Centres - exchange 'strategic' for 'town' in the first sentence.
- Policy 4, Network of Strategic Centres - additional paragraph between paragraphs 1 and 3 referring to Braehead's role and function as a commercial centre.
- Policy 4, Network of Strategic Centres - Bullet 3 - Augment to make clear reference to emphasise that town centres are sequentially preferred to other locations (such as commercial centres) within the network.

Land Securities (PP63)

Greater emphasis that town centres are sequentially preferred to other locations (such as commercial centres) and that Glasgow City Centre should be clearly identified as sitting above all other centres and be given due weight in the SDP.

Diagram 3 Network of Strategic Centres (Page 31)

Scottish Government (PP57_10)

Perceived inconsistency between the base map locations identified in Diagram 3 and those Strategic Centres identified in Schedule 2, Network of Strategic Centres. There should be consistency between the Diagram, its key and the centres listed in Schedule 2

‘Strategic Centre’ terminology

Retail Property Holdings Ltd (PP58_05) and Land Securities (PP63)

Plan refers to ‘strategic’ centres, a term which has no basis in Scottish Planning Policy.

Spatial Development Strategy

Retail Property Holdings Ltd (PP58_05)

The role of the identified network of centres should be summarised following the section (Paragraphs 5.15-5.16 and Joint Strategic Commitment - Glasgow City Centre) on Glasgow City Centre. This new section should also make clear the hierarchy of centres, and the differing roles of town centres and the sole commercial centre, Braehead.

Miscellaneous

Police Scotland (PP16)

Statement on City Centre safety. No specific changes sought.

Councillor Ralph Barker (PP30_02)

Statement on Lanark train services. No specific changes sought.

Intu Shopping Centres Plc (PP31_03)

To ensure consistency with Schedule 2, Network of Strategic Centres, revise the wording within paragraph 6.6 to refer to “future actions” rather than “interventions”.

British Land Company plc (PP55_01)

No specific change sought. Would like to see more specific policy advice about the role of other centres not deemed Strategic Centres.

Evidence base (Background Report 5)

Colony Capital (PP36)

Moreover, in line with the SPP requirement and in view of the shifting emphasis on retail at Braehead, we would expect to see a sequential assessment as part of the supporting evidence. There is no such evidence of this sequential assessment being undertaken or any wider consideration of the implications of the proposed expansion of Braehead to include retail uses. We request that this is undertaken prior to the plan being progressed any further.

Retail Property Holdings Ltd (PP58_04)

The evidence base outlined in Background Report 5 is flawed and the National Survey of Local Shopping Patterns (NSLSP) data is 'broad brush' and insufficiently fine grained to allow a detailed analysis of shopping patterns at a local level.

Land Securities (PP63)

Background Report 5 should be amended to follow the direction of SPP (2014) and confirm the network of centres, this should then be strongly emphasised in chapter 6 of the Proposed SDP and Background Report 5. Glasgow City Centre should be clearly identified as sitting above all other centres and be given due weight in the SDP. Page 5 of Background Report 5, the green table should be amended to take out "Support for other Strategic Centres to deliver their respective role and function" and replaced with text which will protect the City Centre from other strategic centres which are evidently having a negative impact on the city centre.

Summary of responses (including reasons) by Planning Authority:

Network of Strategic Centres - Paragraphs 6.1-6.10 (pages 30-32)

Intu Shopping Centres Plc (PP31_01)

Clydeplan does not accept the modification as it considers the Plan is supported by a range of established and reputable evidence. Background Report 5 (**ASD02**) is a technical paper and not part of the formal Examination process. However, Clydeplan will be updating their evidence base through ongoing monitoring but this has no consequences for approach in the current Plan. However, if the Reporter is so minded, Clydeplan would suggest the following wording additions (underlined) to paragraph 6.9 (page 32):

'Like all the strategic centres in the network, the City Centre is also experiencing challenges. Despite ongoing investment, the City Centre's comparison shopping population has reduced over the last decade. It is strongly influenced by a number of existing, new or expanded major strategic centres, such as Braehead, Easterhouse and Pollok. This along with the greater resilience of other strategic centres, appears to be contributing to a shrinking of the City Centre's shopper population.'

Retail Property Holdings Ltd (PP58 01) and Land Securities (PP63)

Clydeplan does not accept the modification as it considers this matter is adequately covered in Scottish Planning Policy paragraphs 60 and 68 (**ASD01**), the proposed plan sections including, the Joint Strategic Commitment - Glasgow City Centre, paragraphs 6.1-6.10, Policy 4, Network of Strategic Centres, Schedule 2, Network of Strategic Centres and Section 10 Implementing the Plan and Development Management. In particular, Schedule 2 identifies the planning status of each of the strategic centres identified in the network. Any application of national and the Plan policy would have to take cognisance of the relevant planning status of a strategic centre. However, if the Reporter is so minded, Clydeplan would suggest adding an additional paragraph after paragraph 6.6 (page 30) as follows:

“The network of strategic centres consists of a city centre, town centres and a commercial centre and is subject to the provisions set out in Scottish Planning Policy.” (Note: This additional paragraph will mean that all subsequent paragraph numbers following that in section 6 of the Plan will require to be appropriately renumbered).

East Ayrshire Council (PP02)

Clydeplan does not accept the modification as it considers the matter is adequately covered in Scottish Planning Policy paragraphs 70-73 (**ASD01**), the proposed plan sections including: the Joint Strategic Commitment - Glasgow City Centre, paragraphs 6.1-6.10, Policy 4, Network of Strategic Centres, Schedule 2, Network of Strategic Centres and Section 10 Implementing the Plan and Development Management. In particular, the issue of monitoring of investment activity, health checks review and the strategy for a particular strategic centre will be taken forward through the relevant Local Development Plan and will adhere to the requirements in Scottish Planning Policy and the Plan policy approach identified above. With specific reference to Pollok, it should be noted that there has been no change in the planning status of the strategic centre from that in the currently approved Clydeplan. Its planning status remains that of a town centre. As part of the development plan process all of the strategic centres will be reviewed, monitored and assessed as part of the ongoing work of Clydeplan for future iterations of the plan.

Schedule 2 Network of Strategic Centres

SEPA (PP23)

Clydeplan does not accept the modification as it considers the matter of Air Quality Management Areas (AQMAs) is adequately addressed by Map 1, Air Quality Management Areas in the Proposed Plan Strategic Environmental Assessment Updated Environmental Report (**ASD03**), the relevant AQMAs designations, Local Development Plans policies, development management functions and subject to the provisions set out in Scottish Planning Policy Annex A - Town Centre Health Checks and Strategies and therefore does not specifically have to be identified in Schedule 2.

Clydeplan does not accept this modification as it considers the issue of flood risk for the strategic centres is adequately addressed through the guidance identified for this matter in Appendix C Clydeplan Strategic Flood Risk Assessment in the Proposed Plan Strategic Environmental Assessment Updated Environmental Report (**ASD03**) and therefore does not specifically have to be identified in Schedule 2.

Colony Capital (PP36)

Clydeplan does not accept the modification as it considers this matter is adequately covered in Scottish Planning Policy paragraph 60 (**ASD01**) and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraphs 6.1- 6.10; Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management including Schedule 15, Indicative Compatible Development. In particular, Schedule 2 identifies both retail and leisure in the Role and Function column of the Schedule in relation to Paisley. Within Section 10 of the Plan, Schedule 15 (page 97) identifies a range of indicative compatible developments that would be suitable for a strategic centre and both of these uses are identified. Scottish Planning Policy identifies the need to attract footfall generating uses into town centres, which Paisley is, and both of these uses would meet that criteria.

Clydeplan does not accept the modification as it considers the Plan is supported by a range of established evidence, including from the constituent Authorities. Background Report 5 (**ASD02**) is a technical paper and not part of the formal Examination process as the examination is restricted to the Plan. However, Clydeplan will be updating their evidence base through ongoing monitoring but this has no consequences for the approach in the current Plan. It is also considered that the matter of sequential assessment is adequately covered in Scottish Planning Policy paragraph 60 (**ASD01**), and within the proposed plan including, paragraph 6.3, Policy 4, Network of Strategic Centres and Section 10 Implementing the Plan and Development Management. In particular, Schedule 2, also referenced in Policy 4, identifies the planning status of each of the strategic centres identified in the network. Any application of national and the Plan policy would have to take cognisance of the relevant planning status of a strategic centre. It should be noted that retail is an acceptable use within a commercial centre and any strategic development proposal would have to be fully assessed against the policy approach identified above.

NewRiver Retail (PP48)

Clydeplan does not accept the modification as it considers the matter is adequately covered in Scottish Planning Policy paragraph 60 (**ASD01**) and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraphs 6.1-6.10; Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management including Schedule 15, Indicative Compatible Development. In particular, Schedule 2 identifies retail in the Role and Function column of the Schedule in relation to Paisley. Schedule 15 (page 97) of the Plan identifies a range of indicative compatible developments that would be suitable for a strategic centre and this

particular use is identified. Scottish Planning Policy identifies the need to attract footfall generating uses into town centres, which Paisley is, and this use would meet that criteria.

Clydeplan does not accept the modification as it considers the matter is adequately covered in Scottish Planning Policy paragraphs 63 and 66 (**ASD01**), and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraphs 6.1- 6.10; Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management. In particular, the issue of monitoring of investment activity and health checks review is a matter for the relevant Local Development Planning Authority and they would have to reflect the requirements in Scottish Planning Policy and the Plan policy approach identified above. With specific reference to Braehead, it should be noted that there has been no change in the planning status of the strategic centre from that in the currently approved Glasgow and the Clyde Valley Strategic Development Plan (May 2012). Its planning status remains that of a commercial centre. As part of the development plan process all of the strategic centres will be reviewed, monitored and assessed as part of the ongoing work of Clydeplan for future iterations of the plan.

Retail Property Holdings Ltd (PP58 04)

Clydeplan does not accept the modification as it considers the matter is adequately covered in Scottish Planning Policy paragraphs 63 and 66 (**ASD01**) and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraphs 6.1-6.10: Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management. In particular, in Schedule 2, the bullet points identified under both the Challenges and Future Actions reflect the considered view of both Clydeplan and the relevant constituent Authority. In some cases, this reflects ongoing work around a strategy for the particular strategic centre which will be taken forward through the relevant Local Development Plan and will adhere to the requirements in Scottish Planning Policy and the Plan policy approach identified above. With specific reference to Braehead, it should be noted that there has been no change in the planning status of the strategic centre from that in the currently approved Glasgow and the Clyde Valley Strategic Development Plan (May 2012). Its planning status remains that of a commercial centre. As part of the development plan process all of the strategic centres will be reviewed, monitored and assessed as part of the ongoing work of Clydeplan for future iterations of the plan.

Strathclyde Partnership for Transport (PP52 08)

Clydeplan does not accept the modification as it considers the matter is adequately covered in Scottish Planning Policy paragraph 60 (**ASD01**) and within the proposed plan sections including: the Joint Strategic Commitment - Glasgow City Centre; paragraphs 6.1-6.10; Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management including Schedule 15, Indicative Compatible Development. In particular, Schedule 2 identifies residential, where appropriate, in the Role and Function column of the Schedule. Schedule 15 (page 97) of the Plan identifies a

range of indicative compatible developments that would be suitable for a strategic centre and this particular use is identified. Scottish Planning Policy identifies the need to attract footfall generating uses into town centres and this use would meet that criteria.

Strathclyde Partnership for Transport (PP52_09)

Clydeplan does not accept the modification as it considers the term 'limited public transport accessibility' refers to the fact that Kirkintilloch does not include direct access to the railway network. Whilst this is unlikely to change in the foreseeable future, there is potential to improve access to public transport through measures such as physical access to bus stops related to the delivery of the masterplan for the town centre and active travel connections as identified in Schedule 2.

Scottish Government (PP57_10)

Clydeplan does not accept the modification as it considers Diagram 3, Network of Strategic Centres is for indicative purposes only and to enable the user to identify the broad geography of the city region, as is the case for all Diagrams in the Plan. It is not intend to relate specifically to the network of strategic centres identified in Schedule 2, Network of Strategic Centres, some of which are not identified on the base mapping.

Land Securities (PP63)

Clydeplan does not accept the modification as it considers this is not a suitable element to be included in Schedule 2, Network of Strategic Centres. Clydeplan considers the matter is adequately covered in Scottish Planning Policy paragraphs 68, 70, 71, 72 and 73 (**ASD01**) and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraphs 6.1- 6.10; Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management including Schedule 14, Strategic Scales of Development. In particular, Schedule 14 (page 96) outlines the strategic scales of development that would require to be assessed against Diagram 11 (pages 98-99). Furthermore, Schedule 14 states that the relevant policies in Scottish Planning Policy also require to be taken into consideration particularly in respect to promoting town centres.

Policy 4 Network of Strategic Centres (Page 32)

Intu Shopping Centres Plc (PP31_02)

Clydeplan does not accept the modification as it considers this matter is adequately covered in Scottish Planning Policy paragraphs 68, 70, 71, 72 and 73 (**ASD01**) and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraphs 6.1- 6.10; Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management. In particular, Schedule 2 identifies the planning status of each of the strategic centres identified in the network. Any application of national and proposed Plan policy would have to take cognisance of the relevant planning

status of a strategic centre. This planning status determines how the sequential/town centre first approach in Scottish Planning Policy (paragraphs 68, 70, 71, 72 and 73) is applied to each centre in the network in relation to the role and function, challenges and future actions identified in Schedule 2.

Colony Capital (PP36)

Clydeplan does not accept the modification as it considers the matter of sequential assessment is adequately covered in Scottish Planning Policy paragraphs 68, 70, 71, 72 and 73 (**ASD01**) and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraph 6.3; Policy 4, Network of Strategic Centres third bullet point; the Status column in Schedule 2, Network of Strategic Centres; and Section 10, Diagram 11 Implementing the Plan and Development Management. In particular, Schedule 2 identifies the planning status of each of the strategic centres identified in the network. Any application of Scottish Planning Policy and the Policy 4 would have to take cognisance of the relevant planning status of a strategic centre. It should be noted that retail is an acceptable use within a commercial centre and any strategic development proposal would have to be fully assessed against the policy approach identified in the Plan.

Strathclyde Partnership for Transport (PP52 08)

Clydeplan does not accept the modification as it considers this matter is adequately covered in Scottish Planning Policy paragraphs 60 (**ASD01**), and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraphs 6.1-6.10; Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management including Schedule 15, Indicative Compatible Development. In particular, Schedule 2 identifies residential, where appropriate, in the Role and Function column of the Schedule. Schedule 15 (page 97) of the Plan identifies a range of indicative compatible developments that would be suitable for a strategic centre and this particular use is identified. Scottish Planning Policy identifies the need to attract footfall generating uses into town centres and this use would meet that criteria.

Scottish Government (PP57 09)

Clydeplan does not accept the modification as it considers this matter is adequately covered in Scottish Planning Policy paragraphs 68, 70, 71, 72 and 73 (**ASD01**) and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraph 6.3; Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management. In particular, the network of strategic centres have been identified as being the locations deemed, by the Clydeplan authorities, to be strategic at a city region level and are the locations where strategic levels of floorspace should be directed to as set out in Policy 4, Network of Strategic Centres and Section 10 Implementing the Plan and Development Management. It is considered that non-strategic town centres i.e. those town centres not identified by Clydeplan in the Plan, given their scale and roles and functions, are best placed to be promoted and protected by the relevant Local Development Plans policies, development

management functions and subject to the provisions set out in Scottish Planning Policy.

Retail Property Holdings Ltd (PP58 03)

Clydeplan does not accept the modification as it considers this matter is adequately covered in Scottish Planning Policy paragraphs 68, 70, 71, 72 and 73 (**ASD01**) and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraph 6.3; Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management. In particular, Schedule 2 identifies the planning status of each of the strategic centres identified in the network. Any application of Scottish Planning Policy and Policy 4 would have to take cognisance of the relevant planning status of a strategic centre.

Land Securities (PP63)

Clydeplan does not accept the modification as it considers this matter is adequately covered in Scottish Planning Policy paragraphs 68, 70, 71, 72 and 73 (**ASD01**) and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraph 6.3; Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management. In particular, Schedule 2 identifies the planning status of each of the strategic centres identified in the network. Any application of Scottish Planning Policy and Policy 4 would have to take cognisance of the relevant planning status of a strategic centre. In relation to Glasgow City Centre, the Joint Strategic Commitment - Glasgow City Centre, paragraphs 6.7-6.10, Policy 4, and Section 10 Implementing the Plan and Development Management, provide policy support to Glasgow City Centre's position at the apex of the network.

Diagram 3 Network of Strategic Centres (Page 31)

Scottish Government (PP57 10)

Clydeplan does not accept the modification as it considers Diagram 3 is for indicative purposes only and to enable the user to identify the broad geography of the Clydeplan area, as is the case with all Diagrams in the plan. It is not specifically related to the network of strategic centres identified in Schedule 2, some of which are not identified in the base mapping.

'Strategic Centre' terminology

Retail Property Holdings Ltd (PP58 05) and Land Securities (PP63)

Clydeplan does not accept the modification as it considers the network of strategic centres have been identified as being the locations deemed, by the Clydeplan authorities, to be strategic at a city region level and are the locations where strategic levels of floorspace should be directed to as set out in Policy 4, Network of Strategic Centres and Section 10 Implementing the Plan and Development Management. Their respective planning statuses are set out in Schedule 2,

Network of Strategic Centres and any application of Scottish Planning Policy and Plan policy is required to take cognisance of the relevant planning status of a strategic centre. The term strategic centre is currently in use in the approved Glasgow and the Clyde Valley Strategic Development Plan (2012) (**ASD04**) and, as part of that process, the term has therefore been examined and accepted.

Spatial Development Strategy

Retail Property Holdings Ltd (PP58_05)

Clydeplan does not accept the representation as it considers this matter is adequately covered in Scottish Planning Policy paragraphs 68, 70, 71, 72 and 73 (**ASD01**) and within the proposed plan including: the Joint Strategic Commitment - Glasgow City Centre; paragraphs 6.1-6.10; Policy 4, Network of Strategic Centres; Schedule 2, Network of Strategic Centres; and Section 10 Implementing the Plan and Development Management. The network of strategic centres have been identified as being the locations deemed, by the Clydeplan authorities, to be strategic at a city region level and are the locations where strategic levels of floorspace should be directed to as set out in Policy 4 and Section 10 Implementing the Plan and Development Management. Their respective planning statuses are set out in Schedule 2 and any application of national and the proposed Plan policy is required to take cognisance of the relevant planning status of a strategic centre. The term strategic centre is currently in use in the approved Glasgow and the Clyde Valley Strategic Development Plan (**ASD04**) and, as part of that process, the term has therefore been examined and accepted.

Miscellaneous

Intu Shopping Centres Plc (PP31_03)

Clydeplan would accept the modification to revise wording within paragraph 6.6 in order to ensure consistency with Schedule 2, Network of Strategic Centres (pages 33-38) . If the Reporter is so minded, Clydeplan would suggest the following wording additions (underlined) and deletions (strikethrough) to paragraph 6.6 (page 30):

'Schedule 2 lists the network of strategic centres, their challenges and the range of ~~interventions~~ future actions that will be required to support their long-term roles and functions. Local Authorities, through their respective LDPs and related Action Programmes, need to take forward the ~~interventions~~ future actions outlined in Schedule 2.'

British Land Company plc (PP55_01)

Clydeplan does not accept the modification as it considers the non-strategic centres are best promoted and protected by Local Development Plan policies and development management functions and subject to the provisions set out in Scottish Planning Policy.

Evidence base (Background Report 5)

Colony Capital (PP36)

Retail Property Holdings Ltd (PP58_04)

Land Securities (PP63)

Clydeplan does not accept the modifications as it considers the Plan is supported by a range of established evidence, including from our constituent Authorities. Background Report 5 (**ASD02**) is a technical paper and not part of the formal Examination process as the examination is restricted to the Plan. However, Clydeplan will be updating their evidence base through ongoing monitoring but this has no consequences for the approach set out in the Plan.

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

[Note: For DPEA use only.]