



**REPORT TO SCOTTISH MINISTERS ON THE GLASGOW AND THE
CLYDE VALLEY STRATEGIC DEVELOPMENT PLAN**

STRATEGIC DEVELOPMENT PLAN EXAMINATION

carried out under Section 12 of the

Town and Country Planning (Scotland) Act 1997

Reporters: Malcolm Mahony & David Russell

Date of Report: 30 March 2012

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EXAMINATION OF CONFORMITY WITH THE PARTICIPATION STATEMENT

1. Section 12(2) of the Town and Country Planning (Scotland) Act 1997, as amended, states that a person appointed to examine a proposed strategic development plan “is firstly to examine under this section the extent to which the strategic development planning authority’s actions with regard to consultation and the involvement with the public at large as respects the proposed plan have conformed with (or have been beyond the requirements of) the participation statement of the authority which was current when the proposed plan was published under section 10(1)(a).”

2. The Glasgow and Clyde Valley Strategic Development Plan Participation Statement was published with the Glasgow and Clyde Valley Strategic Development Plan Authority’s Development Plan Scheme in March 2009, following which the document was revised and published twice: in March 2010 and March 2011. Since the proposed plan was published in June 2011, the relevant participation statement is the version published in March 2011.

3. The following table summarises the authority’s consultation aims and the participation measures, as indicated in the participation statement. Against each of these, the main evidence of conformity is set out. In some cases this simply amounts to confirmation that the aim or measure was implemented, on the basis of the information supplied by the authority. The authority was also asked to respond to a representation criticising its participation measures.

Summary of authority’s consultation aims	Main evidence of conformity
Arrangements for participation are as inclusive, open and transparent as possible	Glasgow and Clyde Valley Strategic Development Plan Authority website. Housing Need and Demand Assessment webpage. Meetings open to the public.
Information is provided early and in a format that allows full consideration	Comprehensive publications including background papers. Publication and engagement throughout development of plan.
Range of communications formats and locations, especially electronic	Print, website, email, telephone, meetings, etc. Locations for meetings and lodging documents throughout plan area.
Representations considered and reported to Glasgow and Clyde Valley Strategic Development Plan Authority	Representations summarised and reported to Glasgow and Clyde Valley Strategic Development Plan Authority on 12 September 2011. At special meeting of Glasgow and Clyde Valley Strategic Development Plan Authority on 27 September, representations reported in detail and specific areas of concern and issues highlighted.
Participation by: <ul style="list-style-type: none"> • Public sector groups • Private sector groups • Established community groups • Voluntary and environmental organisations • Community planning partnerships 	<ul style="list-style-type: none"> • Implemented • Implemented • Implemented • Implemented • Implemented

Measures	Main evidence of conformity
Glasgow and Clyde Valley Strategic Development Plan Authority website with access to Strategic Development Plan related publications	Launched 30 June 2011
Email registration	Implemented
Telephone and email enquiry point	Implemented
Newsletters – 2 p.a.	2 newsletters published in 2010 and widely circulated
Awareness raising leaflet	Published
Local authority events	Events in each constituent authority
Continuation of Strategic Futures Group	17 meetings
Meetings with public sector	6 meetings
Meetings with private sector	7 meetings with range of trade bodies, representative companies, etc
Meetings with environmental sector	5 meetings
Retail focus group	1 meeting
Representations relating to the authority's consultation and public involvement activities	Glasgow and Clyde Valley Strategic Development Plan Authority response
Representation E63 – Hillhead Community Council: <ul style="list-style-type: none"> • Most community councils in recess during consultation period, making wide consultation impossible. • Web access not easy. • Printed copies should have been more widely available and publicised to all affected communities. 	<ul style="list-style-type: none"> • Representation period 30 June to 26 Aug 2011 fully advertised. 2 weeks longer than minimum 6 weeks to acknowledge summer period. • Timeline for consultation set out in Development Plan Scheme (date for plan consultation and public consultation given as June 2011). • All material related to proposed plan available through website. • Copies of plan available at all constituent local authority council offices and all libraries in plan area.

4. Having considered the evidence, we found that the authority had consulted on the plan and involved the public in the way they said they would in their participation statement, in accordance with section 12(2) of the Act. Being satisfied, we therefore proceeded to examine the proposed strategic development plan.

Issue 1	Strategic Development Plan	
Development plan reference:	Entire Proposed Plan	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E3 Councillor Gordon Murray E11/2 Ashfield Land E14/2 Land Synergy E15/1 Bellisle Developments Ltd E29/1 Ogilvie Homes Ltd. E62 Scottish Association for Public Transport E63 Hillhead Community Council</p>		
Provision of the development plan to which the issue relates:	Entire Proposed Plan	
Planning authority's summary of the representation(s):		
<p>E3 Councillor Gordon Murray Cumbernauld does not feature in the Proposed Plan as a strategic priority and deserves a higher status in terms of Scotland's future economic and development priorities. Attention is drawn to Cumbernauld's central position in lowland Scotland, to its need for additional public housing, the regeneration needs of the town, its investment in public realm, its need for more office and hotel spaces.</p> <p>E11/2 Ashfield Land, E14/2 Land Synergy, E15/1 Bellisle Developments Ltd Proposed Plan is far from concise, its layout and structure are overly complicated and could not be easily interpreted by a layperson. A different approach should be adopted with the structure and text significantly streamlined to reduce complexity.</p> <p>E29/1 Ogilvie Homes Ltd There should be a delay to the consideration of the Strategic Development Plan until a time that the Reporter's recommendations on the on-going Local Plan examination in North Lanarkshire have been published to ensure that the Glasgow and Clyde Valley Strategic Development Plan reflects the adopted housing land supply position of the North Lanarkshire Local Plan.</p> <p>E62 Scottish Association for Public Transport During the Scottish Ministers' assessment of the Proposed Plan, the Scottish Government should commit itself to review its own strategic transport investment programme so as to inform the Proposed Plan and its future effectiveness and rather than delaying a review of the Strategic Transport Projects Review a positive Scottish Government commitment is needed for a fundamental reassessment of Strategic Transport Projects Review as part of the budget process for 2012/13 and following years. This is crucial for an effective Strategic Development Plan and a revised Regional Transport and Energy Strategy within limited funding.</p>		

E62 Scottish Association for Public Transport

Modelling scenarios of economic growth, spatial policy and transport mode share is not adequately considered in the Strategic Development Plan Proposed Plan even though both the Scottish Government and the Strategic Development Plan Proposed Plan argue in principle for an economic strategy breaking the link between economic growth and carbon consumption. This should be extended to include the evidence for a breaking of the link between economic growth and the expansion of car use.

E63 Hillhead Community Council

Consultation on the Proposed Plan was insufficient with access to the document limited given most community councils were in recess at the time. Access to the website to read the Proposed Plan was not easy and printed copies should have been more widely available and have been publicised to all affected communities.

2035 is too far ahead when so many aspects have not received proper evaluation, or where there are too many unknown factors. There are considerable risks in such a proposed time span, given that some points do not seem to have adequate scientific support or evidence. There are no proposals for any assessment or evaluation of its proposals at 5 yearly intervals.

Modifications sought by those submitting representations:**E3 Councillor Gordon Murray**

- no specific modification sought

E11/2 Ashfield Land, E14/2 Land Synergy, E15/1 Bellisle Developments Ltd

- no specific modification sought

E29/1 Ogilvie Homes Ltd

- no specific modification sought

E62 Scottish Association for Public Transport

- no specific modification sought

E63 Hillhead Community Council

- no specific modification sought

Summary of responses (including reasons) by planning authority:**E3 Councillor Gordon Murray**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the representation.

The Proposed Plan's spatial priorities, as set out in the Spatial Development Model (Diagram 10, page 21), recognises Cumbernauld contribution to the long term strategic expansion of the city region through the identification of the Cumbernauld South Community Growth Area which has an estimated capacity of over 2,000 houses. In addition Cumbernauld also features in the Proposed Plan's accompanying spatial framework relating to the development of sustainable communities. Cumbernauld Town Centre is recognised as being part of the city regions network of strategic centres serving the north-east sector of the plan area with civic and community, employment, education, retail and business roles and functions (Diagram 18, page 53).

The Strategic Development Plan is a high-level strategic plan focused on long-term key spatial priorities and does not address detailed proposals at the local level. The issues therefore of public housing in the town, future economic development and regeneration of the town centre, and decisions on public realm are issues which are more appropriately addressed through the local development plan to be developed by North Lanarkshire Council.

E11/2 Ashfield Land, E14/2 Land Synergy, E15/1 Bellisle Developments Ltd

These representations are rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority.

Requirements of Strategic Development Plan legislation

The submitted Proposed Plan meets the requirements of the Planning etc. (Scotland) Act 2006 (page 6, section 7, 8 and 10 and Planning Circular 1 2009 (pages 4, 6, 7, paragraphs 13, 14, 18 to 24) (Supporting Documents 1 and 2). The Strategic Development Plan is a new style of development planning document designed to meet the Scottish Government's challenge of the renewed Scottish Planning System and to support and meet the Scottish Government's 'culture change' agenda.

Presentational approach adopted by the Glasgow and the Clyde Valley Strategic Development Planning Authority

The Proposed Plan is published in a strongly visual and graphical format, so as to

- reduce the inherent complexity of the long-term development planning of Scotland's predominant metropolitan city-region;
- reduce the length and text to that necessary to support the graphical content;
- aid conciseness and emphasise the Strategic Development Plan's Vision and Strategy, with detail policy considerations devolved to the local planning authorities of the eight constituent local authorities.

E29/1 Ogilvie Homes Ltd

This representation is rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority.

Relationship of Strategic Development Plan to Local and Local Development Plans

- the Proposed Plan sets out the latest strategic development planning context for development within the city-region. As such, it is the role of the Proposed Plan to establish the parameters of long-term development and to set the context for local development plans within the city-region.
- it would be inappropriate for a local plan, prepared under a previous generation of legislation, to set the relevant development context for an up-to-date Strategic Development Plan prepared under Scotland's new planning legislation.

E62 Scottish Association for Public Transport

This representation is rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority.

Relationship between the Strategic Development Plan and Scottish Government's Transport Projects Review

- the Scottish Government's Strategic Transport Projects Review, the regional transport strategy and energy strategy are not driven by and lie outwith the scope of the Proposed Plan which is required to be prepared within the Ministerial approved

provisions of the Strategic Transport Projects Review and other related Scottish Government strategies.

- the need for and timing of a 'fundamental reassessment' of the Strategic Transport Projects Review and related Scottish Government strategies is a matter for the Scottish Ministers and Transport Scotland.
- the Proposed Plan can only establish the relevant strategic long-term 'direction of travel' for transport investment and step-change in sustainable transport in the city-region and, assuming future Ministerial approval, would be a material consideration in any review of the Strategic Transport Projects Review and related strategies.

Economic growth, car use, movement by mode and link on transport networks internal and external to the city-region

- these are subjects requiring significant academic research and detailed land-use and transport modelling of an inappropriate level of detail for a Proposed Plan.
- the Proposed Plan, at the strategic level, establishes the linkage between sustainable economic growth and a required step-change in sustainable transport and identifies the potential range of actions which should be considered by the Scottish Government and the regional transport body in seeking to achieve that step-change.

E63 Hillhead Community Council

This representation is rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority.

Representations period and access to the Proposed Plan

- the representations period, 30th June 30 2011 to 26th August 2011 was fully advertised as per section 10 of the 2006 Act, Supporting Document 3.
- the time-line for the Strategic Development Plan submission has been set out in the Glasgow and the Clyde Valley Strategic Development Planning Authority's Development Plan Scheme updated and published in March 2011, Supporting Document 4. The Development Plan Scheme has been made available at the offices of the Glasgow and the Clyde Valley Strategic Development Planning Authority and in all libraries within the Glasgow and the Clyde Valley Plan area and through the Glasgow and the Clyde Valley Strategic Development Planning Authority's web-site.
- the representations period was timed to ensure compliance with the Development Plan Scheme and acknowledging the summer period, was set at eight weeks, two weeks longer than the minimum six weeks (section 10(2) 2006 Act (Supporting Document 1)).
- the Glasgow and the Clyde Valley Strategic Development Planning Authority commissioned a new web-site (www.gcvsdpa.gov.uk) which went live on the 30th June 2011, the commencement date of the representations period.
- all material related to the Proposed Plan was freely available through the www.gcvsdpa.gov.uk website.
- copies of the Proposed Plan were available at all constituent local authority council offices and at all libraries within the Glasgow and the Clyde Valley Plan area, as per legislation.

It is considered that the Glasgow and the Clyde Valley Strategic Development Planning Authority satisfied the provisions of Section 10(1) of the Planning etc. (Scotland) 2006 Act, Supporting Document 1.

The Proposed Plan's Plan Period

- in line with legislation and planning guidance, the Strategic Development Plan Proposed Plan adopts a minimum twenty year perspective. The Proposed Plan, in line with the Scottish Government's policy, is founded upon a sustainable development perspective and this shapes the logic and flow of the document and the complex set of strategy inter-linkages. Whilst such a long-term view inevitably cannot predict or forecast accurately what will occur through the life of the Plan, this approach emphasises Vision and Planning Strategy and establishes a clear direction of travel for long-term development.

The Proposed Plan's Review Cycle

- the Proposed Plan follows directly from the Glasgow and the Clyde Valley Joint Structure Plan 2000, the Glasgow and the Clyde Valley Joint Structure Plan 2006 (the Third Alteration to the 2000 Plan) and establishes five-yearly review process with its submission in 2011.
- this sequence of five-yearly reviews, established by successive Glasgow and Clyde Valley Strategic Development Planning organisations since 1996, meets the demands of the Scottish Government's Scottish Planning Policy (page 4, section 21), Supporting Document 5.

Reporter's conclusions:**Cumbernauld**

1. The authority's response to representation E3 outlines the ways in which the proposed plan recognises the contribution of Cumbernauld to the strategic expansion of the city region. I have no evidence to find otherwise than that this gives appropriate prominence to Cumbernauld's role. Issues of public housing in the town, future economic development and regeneration of the town centre, and decisions on the public realm are more properly addressed in the local development plan, which will be the responsibility of North Lanarkshire Council, rather than the strategic level plan subject of this examination.

Brevity and complexity

2. Although representations E11/2, E14/2 and E15/2 criticise the plan for complexity and lack of brevity, it is for planning authorities to interpret the guidance in Circular 1/2009: Development Planning that "Scottish Ministers expect SDPs to be concise visionary documents" in the light of circumstances in their area. In this case, the Glasgow and Clyde Valley region accounts for around a third of Scotland's population and economy, and the proposed plan seeks ambitious levels of growth in both those respects. I am not therefore persuaded that modifications should be recommended on the basis that the length and complexity of the plan are inappropriate.

North Lanarkshire Local Plan

3. Representation E29/1 urges a delay in examination of the proposed plan until the housing land supply situation in North Lanarkshire is clarified by publication of the report on the local plan examination. Whilst that report has now been published, it has no necessary bearing on the proposed plan. The strategic development plan, as proposed to be modified, sets out preliminary and indicative housing requirements following which local authorities "will be required to demonstrate that the sites to be allocated in their local development plans are capable of proving effective in delivering the required housing completions in the relevant periods ..." The North Lanarkshire housing land supply allocation will be incorporated into that process when the local development plan for that area is prepared.

Strategic Transport Investment and Projects

4. Review of the strategic transport investment programme and reassessment of the Strategic Transport Projects Review (as sought in representation E62) are matters for Transport Scotland and, ultimately, Scottish Ministers. This examination is restricted to consideration of the proposed plan and not the actions of other parties.

Economic growth, car use, movement by mode and link on transport networks

5. Representation E62 argues for greater consideration of how the link between economic growth and car use/ carbon consumption can be broken. That level of detail would not be appropriate for the proposed plan, which is expected to be “concise and visionary.”

Consultation on the proposed plan

6. Representation E63 complains about timing, duration and access to information in relation to the consultation process for the proposed plan. The adequacy of the planning authority’s consultation measures is addressed in the report on conformity with the participation statement.

Timescale and review

7. Representation E63 maintains that the 2035 horizon for the plan is subject to too many unknown factors, and lacks supporting evidence. However, Scottish Planning Policy requires that strategic development plans should indicate housing land allocations “to meet requirements up to year 12 beyond the predicted year of plan approval and an indication of the possible scale and location of housing land up to year 20”. The proposed plan’s timescale accords with that requirement.

8. With regard to the complaint that there are no proposals to reassess the plan at 5 yearly intervals, the strategic authority points to the requirement in Scottish Planning Policy that strategic development plans be reviewed at least every 5 years. Nevertheless, it would be appropriate to mention this in the text for the benefit of those less familiar with government policy.

Reporter’s recommendations:

Modify the fifth paragraph on page v, by adding:

“It is intended to review the strategic development plan every five years, in line with Scottish Planning Policy.”

Issue 2	Philosophy and Principles	
Development plan reference:	Section 1 Philosophy and Principles	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E5/1 Mr Michael and Mr Roger Jones E13/3 sportscotland E21/4 National Grid Property Ltd E21/5 National Grid Property Ltd E26/2 ASDA Stores Ltd E37 Forge Properties LLP E46/1 Susan Barnes (Landowner) E50 Hometown Foundation E52/1 Mactaggart and Mickel Homes Ltd. E55/1 Homes for Scotland E56 Ravenscraig Ltd. E60/1 Scottish Natural Heritage E62 Scottish Association for Public Transport</p>		
Provision of the development plan to which the issue relates:	Fundamental Principles (page 4) Diagram 3 (page 5) Diagram 4 (page 6)	
Planning authority's summary of the representation(s):		
<p>Fundamental Principles (incorporating Diagrams 3 and 4)</p> <p>E5/1 Mr Michael and Mr Roger Jones There appears to be inherent contradictions with regards to the Fundamental Principles, in particular:</p> <ul style="list-style-type: none"> the explanatory text in paragraph 1.7 indicates that the Strategic Development Plan document is concerned less about policy provision with a greater focus on vision and strategy. However, the Fundamental Principles then detail that development and investment proposals that accord with the Spatial Development Strategy are supported, whilst those that do not reflect the Spatial Development Strategy are not supported. It could be considered that they are deemed to be contrary to the Spatial Development Strategy. they provide a very narrow base for considering development and investment proposals which are in accordance with the Spatial Development Strategy. <p>E13/3 sportscotland, E21/5 National Grid Property Ltd, E37 Forge Properties LLP Addition of a thematic issue e.g. sport, gasworks brownfield land, or a new location e.g. North Glasgow, to Diagram 3.</p> <p>E21/4 National Grid Property Ltd, E26/2 ASDA Stores Ltd Deletion of the assessment of need/demand from the sustainable assessment tool in Diagram 4.</p>		

E5/1 Mr Michael and Mr Roger Jones, E46/1 Susan Barnes (Landowner), E50 Hometown Foundation, E60/1 Scottish Natural Heritage

Introduction of a new criterion into Diagram 4 including matters related to disadvantaged communities, local opportunities, community ownership and cooperative initiatives and landscape character.

E55/1 Homes for Scotland

Clarity is required on how Diagram 4 is to be used by a development management authority and whether such authority has the discretion to decide whether development proposals which do not reflect the strategy can nonetheless be included in Local Development Plans if the planning authority considers they are necessary and justified.

Where the assessment indicates extant need/demand and the location being proposed is sustainable, it is assumed that the proposal could be approved or included in the Local Development Plan.

Where the assessment indicates need/demand but the location is considered unsustainable, it is assumed that the local planning authority has the discretion to decide on a balance of factors whether to approve the proposal or include the proposal in a Local Development Plan.

It would be helpful if, at the outset in Part 1 of the Plan, it was stated that local authorities have scope to make decisions on proposals of any scale which might be incorporated into Local Development Plans to meet needs and demands.

E62 Scottish Association for Public Transport

The Strategic Development Plan should take a role in the future of the regional transport authority, Strathclyde Partnership for Transport, and in a more prioritised review of the Regional Transport Strategy.

Modifications sought by those submitting representations:**Fundamental Principles****E5/1 Mr Michael and Mr Roger Jones**

Indicate that whilst there is a Spatial Development Strategy, development and investment proposals that provide for sustainable economic growth and which meet the tests detailed in column 4 of page v, as set in the Main Issues Report, will also be in accordance with the Strategic Development Plan as this will provide a broader base for development and investment proposals to be made with confidence, allowing for an interim strategic focus on sustainable growth of existing settlements that have infrastructure capacity and the ability to accommodate development.

E55/1 Homes for Scotland

Bullet point 2 (page 4) is extended by adding the phrase “and weigh this against other social and economic objectives including need and demand.”

E62 Scottish Association for Public Transport

The finalised Strategic Development Plan should be more explicit on the advantages of a reformed Strathclyde Partnership for Transport having a greater involvement in, and financial responsibility for, decisions on public transport franchising, fares and bus quality contracts within the conurbation. There should be much closer links between the Strategic Development Plan and urgent reassessment of the Regional Transport Strategy.

Diagram 3**E13/3 sportscotland**

Insert “sport” as one of the indicative forms of development in line with strategy.

E21/5 National Grid Property Ltd

Diagram 3 should advise that other locations are also sustainable locations for development such as former gasworks sites in need of regeneration.

E37 Forge Properties LLP

The Spatial Development Strategy and indicative compatible development on page 5 should include Glasgow North as a Sustainable development location. When this area, and our client's proposal is tested against the assessment in Diagram 4, Sustainable location assessment, it is evident Glasgow North should be included in the strategy.

E56 Ravenscraig Ltd.

Insert “retail” in list against Ravenscraig.

Diagram 4**E5/1 Mr Michael and Mr Roger Jones**

Within the Supply-side: Sustainable location assessment add, after Low carbon energy section:

- Support of disadvantaged communities?
- Providing affordable housing provision?
- Supporting introduction/improvement of sustainable transport provision and local services?

E21/4 National Grid Property Ltd

References to Demand side to known demand/need should be deleted. Economic competitiveness and prosperity should be included in the Supply-side assessment and given equal weight to regulatory and sustainability factors.

E26/2 ASDA Stores Ltd

References on Demand-side to known demand/need should be deleted. The economy, competitiveness and prosperity should be included in the Supply-side assessment and given equal weight to regulatory and sustainability factors.

E46/1 Susan Barnes (Landowner)

Supply-side: Sustainable location assessment Network of Centres add sentence: “Providing local-scale development opportunities that are, or can be, sustainably linked with existing local centres”.

E50 Hometown Foundation

Include reference to the potential for “Community Development and Ownership initiatives” that recognise the wider social benefits of cooperative based on proposals such as Owenstown.

E55/1 Homes for Scotland

‘need and demand’ should be specifically highlighted in as part of the ‘sustainable location assessment’.

E60/1 Scottish Natural Heritage

Include the following criterion in the Green Network section, “maintaining and enhancing the landscape character.”

Summary of responses (including reasons) by planning authority:**Proposed Modifications to the Fundamental Principles**General reasoning

- The Fundamental Principles of the Proposed Plan seek to lead strategic development, to prioritise development in a period of financial constraint, and to create a strategic context for local development plans and development management decisions.
- Despite its focus on Vision and Strategy and devolution of detailed policy to the Local Development Plan, the Strategic Development Plan remains a key part of a plan-led Development Plan system (Scottish Government’s Scottish Planning Policy ‘Core Principles’ page 2, section 8 – Supporting Document 1).
- Development which accords with the Strategy and its priorities are supported.
- The corollary also applies in a plan-led system and proposals therefore need to be assessed on their merits. Diagram 4 provides a tool to that effect with the concepts of ‘need’/‘demand’ integral to that tool.
- The Proposed Plan’s philosophy, with its foundation in sustainable development, in economic social and environmental terms, provides an appropriate framework the assessment of development proposals. The Fundamental Principles enshrine that approach.

Specific Modifications to the Fundamental Principles**E5/1 Mr Michael and Mr Roger Jones**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification. The fact that the Strategic Development Plan remains a key component of the new Development Plan system appears not to be recognised by the respondents. The Strategic Development Plan therefore has to provide a strategic context for the assessment of development proposals within the development management process. The Strategic Development Plan also needs to provide a clear statement of how the Spatial Development Strategy applies to individual development proposals. The sustainable location assessment tool, built upon the key foundations of the development strategy (Diagram 4, page 6) then provides the relevant vehicle for assessing the relationship between a proposal and the Spatial Vision and Strategy.

E62 Scottish Association for Public Transport

The proposed modifications, whilst understood, are rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority as inappropriate to and incompatible with a Strategic Development Plan. In terms of the Proposed Plan promulgating a reorganisation of the regional transport body and transport delivery, such content, focusing on organisational issues, is outwith the mandate of the Strategic Development Planning Authority and therefore inappropriate in a Spatial Vision and Development Strategy document. Whilst acknowledging the need for closer integration between the Proposed Plan and the Regional Transport Strategy, in terms of content and delivery, it is for the Regional Transport body to take forward its review of strategy with the Strategic Development Plan Proposed Plan and its strategic Action Programme as relevant strategic context considerations.

Proposed Modifications to Diagram 3

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications as they seek to introduce on one side a new spatial priority within the Spatial Development Strategy and on the other, an inappropriate level of detail in a Strategic Development Plan.

Specific modifications sought to Diagram 3**E37 Forge Properties LLP**

The Proposed Plan clearly sets out its core components in Diagram 3 and Diagram 10. North Glasgow is not defined as a core component and its introduction would dilute the planned strategic focus on the core components as the structural priorities of the Proposed Plan.

E13/3 sportscotland, E21/5 National Grid Property Ltd, E56 Ravenscraig Ltd.

Diagram 3 provides a strategic context for Local Development Planning and for Development Management relative to the types of development mix that would be compatible with key structural components of the SDP. The list is clearly stated as indicative and not exhaustive and many development sub-components, e.g. economic activity, leisure, are not listed in order to avoid a list that would be unwieldy and exhaustive and the suggested additions are more than adequately framed by the broad categories already included.

Proposed Modifications to Diagram 4

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the overall body of proposed modifications as it is considered they potentially undermine the clear strategic focus of the Proposed Plan being a plan-led approach based upon sustainable development as its future direction.

General reasoning

- Diagram 4 is included to assist development management decisions on strategic development proposals within the framework of the Plan, it is a strategic tool in the absence of specific policy.
- it looks at potential proposals from a demand/need and supply perspective. The latter aspect is framed by the sustainable development philosophy and structure of the Strategic Development Plan and its strategic focus.
- it does not direct development management decisions but provides a tool by which development management can conclude a balanced view, relative to a balanced assessment of the demand/need and the supply equation.
- the final decision on whether to approve or reject a proposal lies wholly with the development management authority and the matrix outcome of the assessment will allow that authority to consider all material considerations of the proposal and its strategic context before taking a decision.

Specific modifications sought to Diagram 4**E5/1 Mr Michael and Mr Roger Jones, E46/1 Susan Barnes (Landowner), E50 Hometown Foundation**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications as they seek to introduce local considerations inappropriate to a **strategic level** tool.

E21/4, E26/2 ASDA Stores Ltd

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications as the removal of the demand/need side of the equation would unbalance the overall consideration by the development management authority of any development proposal rendering a distorted strategic context for that proposal vis-a-vis the Proposed Plan's development strategy.

The economy and competitiveness are already included within the supply-side assessment of the diagram, fully aligned with the Scottish Government's drive towards sustainable economic growth, defined in the Scottish Government's Scottish Planning Policy paragraph 33 (Supporting Document 1); towards sustainable development, Scottish Planning Policy paragraphs 34 to 40 (Supporting Document 2); towards climate change mitigation, Scottish Planning Policy Section 41 to 43 (Supporting Document 3) and towards a low-carbon economic future, Scottish Government's 'A Low Carbon Economic Strategy for Scotland' Ministerial Foreword, (Supporting Document 4) and pages 13 to 15 and 19 (Supporting Document 5).

The proposed amendments seek to separate the concepts of economy/competitiveness/prosperity from sustainable economic growth and sustainable development, both of which are central to the philosophy of the SDP and its strategic 'direction of travel' in full alignment with the key tenets of the Scottish Government's long-term vision as expressed through its Low-carbon Economic Strategy and Scottish Planning Policy.

E55/1 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification. The Assessment of 'need/demand' is integral to the sustainable location assessment tool (Diagram 4, page 6) and its role is clearly stated in the Fundamental Principles of a plan-led approach and a clear focus on spatial priorities.

E60/1 Scottish Natural Heritage

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it seeks to introduce an inappropriate criterion into the assessment of development proposals at the strategic level and their relationship to the Green Network component of Strategy in the Proposed Plan.

Landscape character is not addressed as a strategic issue in the Proposed Plan, being considered more relevant to detailed assessment criteria at the local level.

Diagram 4, as a tool, is linked only to the key components of the Proposed Plan and therefore reflects only those themes essential to the delivery of Vision and Strategy with detailed local context of any proposal being devolved to the local development plan and the local development management process.

Reporter's conclusions:**Additions to Diagram 3**

1. The addition of sport, regeneration of former gasworks sites and retail as indicative forms of development in Diagram 3 (as suggested, respectively, in representations E13/4, E212/5 and E56) is unnecessary. The listed forms of development are not intended to be exhaustive, and the existing categories are broad enough for the advocated additional forms of development to be treated favourably.

2. The plan has elected to focus on a limited number of strategic development locations. That inevitably leaves out other locations which may have development merit, as contended in representation E37. However, these can still progress where consistent with the sustainable location assessment set out in Diagram 4 (whose application is recommended for modification – see Issue 27).

Changes to Diagram 4

3. If the requirement for sustainable location assessments were to be balanced against other social and economic objectives, as Homes for Scotland wish (representation E55/1), its purpose would be diluted.

4. Representation E5/1 promotes additional criteria under the supply-side assessment in Diagram 4 to favour development which would support disadvantaged communities outwith the main regeneration areas. This would distract from the strategic thrust of the plan. The considerations which it raises might, however, be appropriate for consideration in the preparation of local development plans.

5. Representations E46/1 and E50 inappropriately seek to introduce local considerations into the Diagram. With regard to the addition of landscape character as a criterion (representation E60/1), the authority has chosen to delegate landscape character issues to local development plans and the local development management process.

6. Representations E21/4 and E26/2 advocate deleting the reference to “known demand/need” on the demand side of Diagram 4. That is not necessary. As confirmed above by the strategic development plan authority, that diagram is to be applied to strategic development proposals. Where such proposals relate to a known need or demand which has been established in the development plan, that will be one factor in establishing whether the proposal is in line with the Spatial Development Strategy and supports its role and function.

7. However, where such a strategic development proposal does not relate to a known need or demand which has been established in the development plan, the authority has also confirmed that the responsibility for deciding on the overall acceptability of the proposal will lie wholly with the relevant local authority. In that context, it has also confirmed that the use of the assessment matrix set out in Diagram 4 is intended to be a tool to assist the authority to reach a decision, taking into account all of the material considerations as well as its strategic context.

8. I consider that the text of the second bullet point of the ‘Fundamental Principles of the Strategic Development Plan’ should be modified to clarify the position.

9. The requirement for a developer to demonstrate need for a scheme is applicable only in limited circumstances (see the references in the representations). Furthermore, in the case of town centre development, Scottish Planning Policy (at paragraph 55) specifically states that “Where proposals support a centre’s role and function, as identified in the development plan, there is no requirement to provide a detailed assessment of need.” In cases where retail or commercial leisure development is contrary to the development plan, the proposal should “help to meet qualitative and quantitative deficiencies identified in the development plan” (paragraph 64); in other words, there is no mention of “need”. In these circumstances, Diagram 4 will need to clarify that the need/demand element of the assessment is circumscribed.

10. It is also advocated that a reference to economy, competitiveness and prosperity should be added on the supply side. Economy and competitiveness are already included on the supply side of the Diagram, but prefixed by “sustainable”. To remove that qualifier would change the thrust of the assessment, which is based on the plan’s strategic vision and supported by various aspects of government policy.

Strathclyde Partnership for Transport; Regional Transport Strategy

11. The role of Strathclyde Partnership for Transport lies outwith the remit of strategic development planning. It is for the Regional Transport body to take account of the proposed plan and its action programme in reviewing its strategy.

Reporter’s recommendations:

1. Modify the second bullet point of the ‘Fundamental Principles of the Strategic Development Plan’ to read:

“New strategic development proposals which do not reflect the Spatial Development Strategy and its related frameworks are deemed not supportive of the Spatial Vision and Strategy . As such, they will require to be assessed upon their own merits by the relevant local authority. This assessment should adopt the sustainable location assessment set out in Diagram 4 which reflects the philosophy and policy direction of the Strategic Development Plan. This will assist the local authority to decide on the acceptability of such proposals where these are unrelated to a known need or demand that has been established in the development plan, and/or are proposed for a location which is not sustainable.

2. Modify Diagram 4 by adding explanatory notes to the Demand-side element, as follows:

“Explanatory notes:

- This will not apply in the case of town centre retail and commercial development, where the relevant policy in Scottish Planning Policy should be followed.
- Whilst the existence of known need/ demand may be a supporting factor, the lack of need in itself is not a valid consideration, unless the lack of need is relevant because of the detrimental effects of the development.”

Issue 3	Economic and Demographic Framework	
Development plan reference:	Section 2 Economic and Demographic Framework	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E28 Bishopton Action Group E29/2 Ogilvie Homes Ltd E44 Paisley West & Central Community Council E49/1 Jackton & Thorntonhall Community Council E52/2 Mactaggart and Mickel Homes Ltd. E62 Scottish Association for Public Transport</p>		
Provision of the development plan to which the issue relates:	<p>Diagram 5 (page 9) Diagram 6 (page 10)</p>	
Planning authority's summary of the representation(s):		
<p>E28 Bishopton Action Group, E44 Paisley West & Central Community Council The economic and demographic forecasts within the Proposed Plan are overly optimistic, but provide no alternative forecasts.</p> <p>E29/2 Ogilvie Homes Ltd The Proposed Plan should aspire to much greater growth in the region which would support the current housing policy which requires the provision of a generous housing supply.</p> <p>E49/1 Jackton & Thorntonhall Community Council National Records of Scotland (formerly General Registers of Scotland) should be used as a basis for the forecasts rather than the Glasgow and the Clyde Valley Strategic Development Planning Authority's regional figures which are founded upon an inflated base value.</p> <p>E52/2 Mactaggart and Mickel Homes Ltd. Need for an economic forecast with specific provision for growth in the construction sector.</p> <p>E62 Scottish Association for Public Transport Need for a much expanded and more detailed examination of strategic forecasts of economy and demography into underlying transport passenger and mode projections, including modelling of population movements associated with specific sectors e.g. higher education.</p>		
Modifications sought by those submitting representations:		
<p>E28, Bishopton Action Group, E44 Paisley West & Central Community Council E52/2 Mactaggart and Mickel Homes Ltd. No specific suggested modifications proposed other than consideration that that the</p>		

forecasts used in the Proposed Plan are overly optimistic or a need to favour employment growth in a specific sector.

E29/2 Ogilvie Homes Ltd

Need for increased growth projections to support the current housing policy which requires the provision of a generous housing supply.

E62 Scottish Association for Public Transport

Diagram 5 should be amended to show upper and lower limits on expectations of Gross Value Added and employment change to 2020 and 2035. This should also include estimates of overall GVA growth. Data should also be added on further education attenders in the central Glasgow zone and elsewhere in the conurbation and include estimates of changes in total passenger movement and mode share beyond the conurbation, changes in passenger movement and mode share within the conurbation (including the share related to trips to and from the expanding Glasgow city centre zone)”

E49/1 Jackton & Thorntonhall Community Council

Amend the 2008 households figure in Diagram 6 on page 10 of the Proposed Plan from 804,708 to 794,440 and recalculate the associated 2008/25, 2008/16, 2008/20 change and annual change figures accordingly.

Make any necessary amendments to all other parts of the plan which rely upon household projections as an input in particular Schedules 6, 8, 9 and 10 of Part 4 of the Proposed Plan.

Summary of responses (including reasons) by planning authority:

E28 Bishopton Action Group, E29/2 Ogilvie Homes Ltd

E44 Paisley West & Central Community Council, E52/2 Mactaggart and Mickel Homes Ltd.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications for the following reasons.

Economic Scenario and Related Forecast

- the economic scenario which underpins the forecasts stems from work commissioned from Oxford Economics (Supporting Document 1 pages 35 to 40). Its alternative economic scenarios were led during the Main Issues Report stage of the Strategic development Plan and the favoured ‘Re-balanced Economy’ scenario taken forward from the Main Issues Report to the Proposed Plan.
- the ‘re-balancing economy’ scenario models a reducing emphasis on the previous Services-dominated economy towards a more balanced regional economy with new key ‘green’ sectors, technology and services, developed.
- this scenario, whilst aspirational, is wholly in line with the Scottish Government’s drive towards a ‘Low-carbon’ economy (Supporting Document 2) and already evidence is being led of the city-region’s growth in such sectors, The Economist article 17th February 2011 and HSBC Business Report 2011 (Supporting Documents 3 and 4).
- Scottish Planning Policy (page 3, section 15) (Supporting Document 5) suggests that Development Plans should be aspirational, whilst also being realistic. Early evidence suggests that the Strategic Developments Plan’s economic foundation is both appropriate in its aspiration and evidence.
- the economic scenario supports the demographic projections in that, if achieved

during the plan period, will have the potential to stimulate employment growth and positive net in-migration.

E49/1 Jackton & Thorntonhall Community Council

The proposed representations/modifications are rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority for the following reasons.

City-region Forecasts v. Nationally-derived Forecasts

The issue of an Authority favouring the use of locally oriented and refined demographic projections, which more accurately model the characteristics of the city-region, as against the use of nationally derived projections from National Records of Scotland (formerly General Registers of Scotland) has previously been tested in the Court of Session, *Scottish House Builders Association Ltd. v. Scottish Ministers 2001* (Supporting Documents 6, 7 and 8). In this case, in respect of the preceding strategic plan for the city-region, the Scottish House Builders Association Ltd (forerunner of Homes for Scotland) appealed the use by the regional authority of locally-derived projections rather than those of General-Registers of Scotland. The appeal was dismissed as the Scottish Government had the appropriate provisions in place to allow more accurate and pertinent local data to be used (Supporting Document 9). The Glasgow and the Clyde Valley Strategic Development Planning Authority therefore continues to adopt its own projections as the basis of the Proposed Plan as a more accurate in city region terms and better reflecting the population and household characteristics of the area rather than the long-term National Records of Scotland projections.

E62 Scottish Association for Public Transport

The proposed representations/modifications are rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority for the following reasons.

Expanding the Economic Forecast into Sectoral Transport Forecasts

In a section focusing on the strategic economic and demographic context of the Proposed Plan, the suggested analysis, including modelling of passenger numbers, of higher education flows, etc. would constitute both a diversion from the key strategic issues of the economy and its relationship to household numbers, and represent inappropriate detail within a Strategic Development Plan.

A number of scenarios of economic and demographic change were led at the Main Issues Stage (Main Issues Report 2010, pages 22 and 23) (Supporting Document 10) and following consultation, a preferred scenario was adopted for the Proposed Plan (pages 8 and 9) and therefore it is not considered appropriate therefore to revisit scenarios of Gross Value Added growth.

Reporter's conclusions:

Economic and demographic forecasts

1. Scottish Planning Policy encourages planning authorities to create "ambitious" plans, which are "aspirational but realistic". Although representations E28 and E44 question the realism of the plan's economic and demographic forecasts, those forecasts are supported by detailed technical studies (including Background Report 1: Economic Outlook and Scenarios, and Background Report 2: Projection of Population and Households to 2025). Background Report 1 examines various economic scenarios (including options similar to the "rebalanced economy" as used in the proposed plan) and assesses their probabilities. With reference to the relevant, more ambitious, scenarios, the report's authors consider

the likelihood of a faster growth trajectory to be modest but well within the realms of possibility. These ambitions are in line with the government's drive towards a low-carbon economy. Indeed, the strategic planning authority has submitted early evidence of the city-region's growth in the renewable energy sector, which is an important element of the "rebalanced economy".

2. Whilst the plan's demographic forecasts exceed the government household projections, that is an acceptable variation where the differences are reasoned and are considered to be more fitted to local circumstances. In this case, the plan's demographic forecasts are supported by the chosen economic scenario, which is expected to stimulate higher net in-migration. The respondents have not submitted any equivalent technical evidence to challenge the authority's stance. There is therefore no sound basis on which to recommend that Ministers interfere with the authority's choice.

3. As for providing alternative projections, I note that alternative economic scenarios were led at the Main Issues Report stage. The reasons for selection of the favoured "rebalanced economy" scenario were set out, and that scenario has been taken forward to the proposed plan. Again, I have not been provided with evidence to rebut that approach. Beyond this, the Town and Country Planning (Scotland) Act 1997 states that alternative proposals may be submitted where component authorities are unable to agree the proposed plan. That is not the case here.

Greater growth

4. The opinion expressed in representation E29/2 that the plan should aspire to much greater growth is not supported by any evidence or detailed argument. The authority has provided evidence to justify the level of growth chosen for the plan, and I have no reason to recommend a higher level.

Reporter's recommendations:

No modifications.

Issue 4	Spatial Vision	
Development plan reference:	Section 3 Spatial Vision	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E2/1 Peel Environmental Ltd E13/4 sportscotland E21/3 National Grid Property Ltd E22/1 Network Rail E24 Banks Group E26/1 ASDA Stores Ltd E38/1 E38/2, E38/3 RSPB Scotland E52/3, E52/4, E52/5, E52/6 E52/7 Mactaggart and Mickel (Homes) Ltd. E55/5 Homes for Scotland E57 Scottish and Southern Energy Plc & Group Companies E58 Strathclyde Partnership for Transport E62 Scottish Association for Public Transport</p>		
Provision of the development plan to which the issue relates:	<p>Diagram 7 (pages 12 and 13) Diagram 8 (page 14)</p>	
Planning authority's summary of the representation(s):		
<p>The proposed modifications to Diagram 7 'Spatial Vision' and Diagram 8 'Strategic Drivers of Change' generally fall into six categories;</p> <ol style="list-style-type: none"> 1) E2/1 Peel Environmental Ltd, E55/5 Homes for Scotland Spatial Vision should provide the Strategic Development Plan context for development proposals from the waste to energy sector and house-building industry. 2) E13/4 sportscotland, E38/1, E38/2, E38/3 RSPB Scotland, E57 Scottish and Southern Energy Plc & Group Companies, E58 Strathclyde Partnership for Transport Additional text required within the Spatial Vision seeking to safeguard land from inappropriate development or to promote a strategic development plan context for sportscotland, Royal Society for the Protection of Birds, Scottish and Southern Energy, Strathclyde Partnership for Transport. 3) E21/3 National Grid Property Ltd, E26/1 ASDA Stores Ltd, E52/3. E52/4, E52/5, E52/6, E52/7 Mactaggart and Mickel (Homes) Ltd., E55/5 Homes for Scotland <ol style="list-style-type: none"> (a) additional text or amalgamation of text, E21/3 National Grid and E26/1 ASDA Stores, to question the strategic focus of the Proposed Plan and question the Spatial Vision's basis in the analysis of long-term 'drivers of change' (Diagram 8) and (b) additional text from the house-building industry to introduce a flexibility in language in respect of their specific approach to planning housing development. 		

- 4) **E52/3, E52/4, E55/5 Mactaggart and Mickel (Homes) Ltd.** modifications to the Spatial Vision from the house-building umbrella body, Homes for Scotland, and an individual house-building company Mactaggart and Mickel which seek to reframe its priorities and seek a policy inclusion within the Spatial Vision statement of how the city-region, structurally, should look in 2035.
- 5) **E62 Scottish Association for Public Transport**
This Section is slim and very generalised and should be either be incorporated in Section 4 with more detail on the strategy for energy conservation and shifts away from carbon fuel in the urban fabric and transport sub-sectors which account for 66% of present greenhouse gas emissions in the conurbation, or be expanded on the question of the degree to which spatial strategy, as distinct from other actions, can cut carbon release. In either case, there should be some reference to the aims of shifts to electric power in the public transport and car/van sectors within the conurbation by 2020 and 2035. Budgetary considerations require elaboration in the context of phased delivery.
- 6) **E24 Banks Group**
Question why Community Growth Areas not referenced in Diagram 7.

E22/1 Network Rail appears to be a genuine misreading and miscomprehension of the vision for sustainable transport and High Speed Rail.

Modifications sought by those submitting representations:

General

E62 Scottish Association for Public Transport

Expand the Spatial Vision and the role, function and relevance of the section to articulate policies on transport and emissions, budgetary constraints and delivery of priority actions in the transport sphere.

Diagram 7

E2/1 Peel Environmental Ltd

A vision for waste should be included within the Strategic Development Plan within the 'Infrastructure' section of the Diagram. Proposed wording "Waste infrastructure will form a key part of the city-region. New waste management and treatment facilities which support the delivery of a Zero Waste Scotland will be planned and developed across the city-region."

Energy from waste sources be included within the list of appropriate energy sources within the 'Energy' section of Diagram 7, as follows "Decentralised distributed power plants, based on alternative technologies, will be located across the city-region exploiting opportunities to develop biomass, Combined Heat and Power and other forms of renewable energy including Energy from Waste".

E13/4 sportscotland

Environment section in relation to green infrastructure, the text makes reference to open space and some of the different components of this, pathways, parks etc. However, no mention is made of the outdoor sport areas (pitches, golf courses etc) which are a crucial part of this. As the term open space is being expanded on, this should make reference to outdoor sports areas. Insert 'outdoor sports areas' in the text in paragraph 1.

E22/1 Network Rail

Infrastructure section suggested wording, "High Speed Rail would reduce journey times to

the wider UK and International area”.

E24 Banks Group

Community Growth Areas should be referenced in Diagram 7.

E38/1 RSPB Scotland

Environment section, removal of the component relating to commercial forestry. Suggested wording, ‘Important habitats and landscapes will be safeguarded and enhanced, in recognition of their importance to people’s quality of life and the range of vital services they provide. Habitats such a peatlands and woodlands have a key role to plan in mitigating carbon emissions.

E38/2 RSPB Scotland

Energy section, insert ‘small-scale’ before ‘biomass’.

E52/3 Mactaggart and Mickel (Homes) Ltd.

Economy section, insert a new and fourth bullet point in this section which states; "The Glasgow conurbation aims to be economically prosperous, with increased access to employment and services for all communities with a positive reliance and encouragement of future development proposals that improve the sustainable economic growth of the Glasgow and Clyde Valley conurbation."

E52/4 Mactaggart and Mickel (Homes) Ltd.

Urban Fabric section, additional wording to the first bullet point in this section, as highlighted in bold, "Recycled brownfield land, the vacant and derelict land resource, will be developed as the development priority, **but also recognising that a range and choice of development locations are required** and environmental priority will be central to developing a quality of life needed to attract economic activity, talented people and key investors."

E52/5 Mactaggart and Mickel (Homes) Ltd.

Urban Fabric section the second sentence of the second bullet point should be re-worded to allow for flexibility and to allow the Local Development Plan's to identify opportunities that are most suitable for the local area in which they are to be applied. Proposed wording, "The built up area of the city region will be developed with a focus on sustainable locations within it, focusing investment on maintaining a sustainable compact city region."

E52/6 Mactaggart and Mickel (Homes) Ltd.

Urban Fabric section, remove reference to the intention for higher urban density.

E52/7 Mactaggart and Mickel (Homes) Ltd.

Infrastructure section there should be an addition to the final bullet point “.....as evidenced by the continued focus on the legacy of Community Growth Areas (CGAs) which will deliver strategic expansion of specific communities in the long term.”

E55/5 Homes for Scotland

Urban Fabric section insert a further bullet point “Sustainable development is also possible on Greenfield land and on edge-of-settlement or new settlement locations, subject to assessment by local planning authorities”;

Infrastructure section bullet point 3 replace “the alternative” with “an alternative”; replace “prioritised” with “directed”. Add a final sentence: “Greenfield edge-of-settlement development will be assessed in terms of the best possible combination of transportation

measures.”

Energy section delete all text and replace with: “The development plan will support the installation of commercial renewable energy technologies as they develop in the market place. Local Planning Authorities should consider policies and guidance within Local Development Plans to ensure that any impacts of such technologies are acceptable.”

E57 Scottish and Southern Energy Plc & Group Companies

Energy section amended to recognise that centralised energy generation, including commercial scale renewables, will continue to play an important role in the city region during the horizon the plan

E58 Strathclyde Partnership for Transport

Infrastructure section the text of the first sentence of the third bullet is reworded as...“Future transport in the GCVSDP area will be provided by an integrated public transport system, providing a high quality, frequent, reliable and sustainable transport network for the population living and working in the GCVSDP area. The public transport network will include Rail, LRT, BRT, Bus, and Subway supported by an expanded active travel network encouraging cycling and walking. Development will be prioritised in the locations most accessible by public/sustainable transport for both people and freight.”

Diagram 8

E38/3 RSPB Scotland

‘Environmental Legislation’ omits legislation relating to biodiversity. The principal sources of recent wildlife law in Scotland are the [Nature Conservation \(Scotland\) Act 2004](#) and the [Conservation \(Natural Habitats, &c.\) Amendment \(Scotland\) Regulations 2004](#) and these should be included in the list.

E21/3 National Grid Property Ltd

Four of the key drivers: Scottish Government; Climate change mitigation; Sustainable low carbon economy and Environmental legislation should be merged to form one driver instead.

E26/1 ASDA Stores Ltd

Suggest the Scottish Government driver could be amended to include reference to Environmental legislation, the Scottish Government driver would then adequately cover, and allow to be deleted, the Climate change mitigation, sustainable low carbon economy and environmental legislation drivers.

Summary of responses (including reasons) by planning authority:

General

The following proposed modifications are rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority.

General Comments on the Spatial Vision

E62 Scottish Association for Public Transport

- The submitted Strategic Development Plan Proposed Plan meets the requirements of the Planning etc. (Scotland) Act 2006 (page 6, section 7, 8 and 10 (Supporting Document 1) and Planning Circular 1 2009 (pages 4, 6, 7, sections 13, 14, 18 to 27) (Supporting Document 2). The Strategic Development Plan is a new style of development planning document designed to meet the Scottish Government’s challenge of the renewed Scottish Planning System and is designed to meet the

Scottish Government's 'culture change' agenda. (Supporting Documents 1 and 2).

- It is published in a strongly visual and graphical format, so as to
 - (a) reduce the inherent complexity of the long-term development planning of Scotland's predominant metropolitan city-region;
 - (b) reduce the length and text to that necessary to support the graphical content;
 - (c) aid conciseness and emphasise Vision and Strategy, with policy detail devolved to the local planning authorities of the eight constituent councils.
- Furthermore, the representation appears not to understand the role and function of this section of the Proposed Plan as providing a spatial structural vision of the city-region in 2035 as the basis for a Spatial Development Strategy. It seeks to introduce strategy (e.g. energy conservation) and policy instruments (e.g. electromobility in transport) and delivery/budgetary provisions, all of which are inappropriate to a structural Spatial Vision.

Diagram 7

The following proposed modifications are rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority.

Economy in the Spatial Vision

E52/3 Mactaggart and Mickel (Homes) Ltd.

The Strategic Development Plan Proposed Plan is prepared as the spatial expression of the eight local authorities' corporate vision (Supporting Document 3) and is the strategy for delivering the land-use components of that vision. The proposed modification appears more related to a Mission Statement or Corporate Vision, adds nothing to the framing Glasgow and the Clyde Valley Corporate Vision and does not contain locational components inherent in a structural land-use view of the long-term future.

Urban Fabric in the Spatial Vision

E52/4 Mactaggart and Mickel (Homes) Ltd.

The Strategic Development Plan Proposed Plan is founded upon strategic development priorities and on providing clarity of focus as to where development will meet the 'drivers' of the future and support the strategy. Development outwith these priorities will be addressed through the Local Development Plan process or on their individual merits (Diagram 4 sustainable location assessment; page 6).

E52/5, E52/7 Mactaggart and Mickel (Homes) Ltd.

In line with the 'compact city-region' model and minimising development and carbon footprints, the vision needs a priority focus on action to deliver sustainable locations that meet its regeneration and renewal requirements. Controlled growth of these 'footprints' is already integrated into the Vision through the Community Growth Areas (page 19).

E52/6 Mactaggart and Mickel (Homes) Ltd.

Increasing urban density is a key component of the 'compact city-region' model as it delivers the potential to reduce the unit cost of infrastructure provision to an area by increasing potential demand for services within that area, transport, water and sewerage, energy. The basis of the Strategic Development Plan Proposed Plan is clear prioritisation of finite investment levels for such services, particularly under de-regulated operating environments. The scale of the brownfield resource, the need for reinforcement and renewal of urban communities, and investment in infrastructure makes increasing densities a strategic priority.

E55/5 Mactaggart and Mickel (Homes) Ltd.

Greenfield development and edge development are neither priorities nor components of the Spatial Vision, other than where such growth is plan-led as is the case with the Community Growth Areas. With the scale of potential development associated with brownfield land resources and community regeneration, the Spatial Development Vision places the minimising of urban sprawl potential and creeping incremental development of edge locations as central to the 'compact city-region' model, its delivery of national and international carbon reduction targets, and reduction in the unit costs of infrastructure provision.

Infrastructure in the Spatial Vision**E2/1 Peel Environmental Ltd**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it considers energy from waste is already included in the Spatial Vision; it is one of the 'alternative technologies' referred to within the Energy section. This is then given strategic expression in paragraphs 4.110 to 4.113 and Strategy Support Measure 13 (page 56).

E22/1 Network Rail

The Glasgow and the Clyde Valley Strategic Development Planning Authority considers the representation to be a mis-reading of the current wording which focuses on the sustainable transport network within the city-region and its development so as to 'shrink the distance' between the city-region's communities and its Glasgow city core. It does not relate to the function of High Speed Rail 'shrinking the distance' between the city-region and the wider UK or Europe.

E24 Banks Group

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as reference to Community Growth Areas is made in the last sentence of the third bullet point.

E58 RSPB Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority note the proposed modification.

Environment in the Spatial Vision**E13/4 sportscotland**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it considers 'outdoor sports areas' are already included under 'open space - formal'.

E38/1, RSPB Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications for the following reasons

- commercial afforestation (as stated in Diagram 7 "**where appropriate**") has a key role to play
 - (a) in the Scottish Government's drive to increase the indigenous supply of raw timber through its planting targets (Scottish Forestry Strategy 2006) (Supporting Document 4 and 5),
 - (b) to maintain rural businesses and employment (Scottish Land-Use Strategy 2011(Supporting Document 6),

(c) to mitigate carbon in the atmosphere and reduce greenhouse gas emissions (Scottish Forestry Strategy 2006/ Scottish Land-Use Strategy 2011), and
(d) in the reduction of timber imports.

- The integration of commercial afforestation with competing land-uses is effected through the Glasgow and the Clyde Valley Forestry and Woodland Strategy 2011 (Diagram 14 and Background Report 9) and through the Local Development Plan process.

Energy in the Spatial Vision

E38/2 RSPB Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification for the following reasons

- It seeks to pre-judge the biomass potential of any area and to limit the contribution from that renewable source before any evaluation is made of the overall scale and relevance of such potential in an area. The issue of scale should reside with the appropriate local development planning authority to decide, taking into account the context for such development.

E55/5 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as the scale of distributed energy production, its integration with centralised production via the National Grid, and its role in the development of urban area energy 'smart-grids' will be determined by the Local Development Plan process and attendant "energy-carbon-masterplanning" (pages 55 and 64). It is considered therefore that the proposed text would dilute the Vision and introduce a weak devolved policy wording inappropriate to a Spatial Vision of the future.

E57 Scottish and Southern Energy Plc & Group Companies

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications as decentralised energy generation, based upon alternative renewable fuels, is integral to the energy de-carbonisation agenda, the carbon emissions reduction agenda and is central to the development of energy 'smart-grids'. The spatial vision views such generation as working hand-in-hand with de-carbonised centralised energy from the National Grid albeit that the balance should shift long-term from the latter to the former.

Diagram 8

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications.

Strategic 'Drivers of Change'

E21/3 National Grid Property Ltd, E26/1 ASDA Stores Ltd

The strategic 'drivers of change' unite the Spatial Vision with the resultant Development Strategy components required to deliver the Vision. The 'drivers' reflect the key long-term forces framing the future and were fully presented at the Main Issues Report (2010) stage of the Strategic Development Plan and widely supported at that time. They clearly reflect the economic, social, environmental and political forces, from the Scottish to global levels, which must shape the structure of the Strategy. The proposed modifications seek to mask or reduce the relevance and impact of the stated key 'drivers' by amalgamating all 'drivers' into a weak less specified broad category and disguise the relevance of sustainable development, global action on climate change, low carbon futures and the body of

environmental legislation in shaping the Strategy.

Environmental Legislation strategic driver of change on Diagram 8

E38/3 RSPB Scotland

The list of legislative elements was meant solely to highlight pieces of Scottish Government legislative Acts which framed the strategic focus of the Strategic Development Plan i.e. strategic ‘drivers of change’, and was not meant to be an exhaustive list of all available legislation and regulations. The addition of such would simply serve to increase the volume of context and text without providing any real strategic benefit.

Reporter’s conclusions:

Transport

1. The additional material within the Spatial Vision sought by representation E62 relates to detail on energy conservation, fuel policy and budgetary matters rather than the broad vision envisaged by Scottish Government advice in Circular 1/2009: Development Planning.

Economic growth

2. With regard to representation E52/3, reference to encouragement of sustainable economic growth within the Economy section of Diagram 7 would essentially duplicate material expressed in other parts of the Diagram (for example under Urban Fabric), but without the appropriate spatial context.

Community Growth Areas

3. Community Growth Areas are an expression of the plan’s intention that “The extension of the city-region’s built-up area will be restricted by developing a selection of sustainable locations within it”, as set out in the Urban Fabric section of Diagram 7. There is no necessity for more specific reference, as advocated by representation E24.

4. Representation E52/7 advocates that Community Growth Areas should be identified as long-term in nature. Whilst some of the areas have experienced delay in commencement, other representations to the plan indicate that certain Community Growth Areas are progressing towards development on shorter timescales. It will be for local development plans to assess realistic timescales for each of the areas, and it is not for the strategic plan to pre-judge that assessment. Should those timescales reveal a shortfall within the short- or medium-term, the local development plans will require to allocate suitable alternative sites, as described in the recommended modifications to the housing sections of the plan contained in the Annex which follows Issue 27.

Higher urban density

5. Representation E52/6 wishes to see the reference to higher urban density in the Urban Fabric section of Diagram 7 removed on the grounds that the region already has one of the highest population densities in Europe, and that this development form does not meet the market aspirations of many people.

6. There is clearly scope for differences of view on this topic. However, increasing urban density is a key component of the compact city-region model adopted by the plan. Scottish Planning Policy advises that higher densities will be appropriate at central and accessible locations. The promotion of higher urban densities in “the city-region core and associated urban areas” is in line with that advice, and is adequately justified.

Compact city-region

7. Rewording of part of the Urban Fabric section of Diagram 7 as proposed in representation E52/5 would weaken the plan's focus on the delivery of sustainable development locations. Controlled growth outwith the existing urban footprints at a strategic scale is already allowed for through the Community Growth Areas.

Brownfield land

8. In the Urban Fabric section of Diagram 7, the recycling of brownfield land is described as the "development priority and environmental priority". That formulation gives priority to the use of brownfield land for development, but does not exclude greenfield land from consideration. It will be for local development plans to address this issue. In doing so, the need to find a range and choice of development locations, as is suggested in representation E52/4, will be just one of a number of factors to be assessed.

9. It is entirely appropriate for the proposed plan to focus on its vision and not possible exceptions to that vision, such as greenfield and edge-of-settlement development (as suggested in representation E55/5), especially at a strategic scale and in view of existing allocations for Community Growth Areas, some of which are in greenfield and edge-of-settlement locations.

Public transport and active travel

10. Representation 55/5 criticises the Infrastructure section of Diagram 7 for over-emphasis on public transport accessibility to potential development sites. However, the choice of emphasis is for the authority to determine, and has not been convincingly demonstrated to be inappropriate.

11. Alternative text for part of the Infrastructure section of Diagram 7 is suggested in representation E58. The extra detail which it contains is unnecessary for a vision statement.

High speed rail

12. Improved linkages between the region and the wider world resulting from high speed rail, as referred to in representation E22/1, are for a larger spatial planning context. The Infrastructure section of Diagram 7 focuses on improving sustainable transport between Glasgow's city core and other communities within the region.

Waste

13. Diagram 7 articulates key "step change" components in the strategic vision. Those selected are expected to have greater potential than waste infrastructure for delivering the low-carbon future, climate change mitigation targets and long term sustainable development envisaged in the plan. Moreover, the need for specific types and numbers of waste infrastructure facilities, and whether new facilities are required, are subject to on-going study by the authority. To adopt the wording suggested in representation E2/1 would pre-empt the outcome of that work.

Outdoor sports areas

14. Regarding representation E13/5, outdoor sports areas are included within the reference to formal open space in the Environment section of Diagram 7. This being a strategic document, there is no need for further detail.

Commercial forestry, habitats, landscapes

15. Representation E38/1 considers that the Environment section of Diagram 7 over-

emphasises woodlands and especially commercial forestry (which receives no explicit support in Scottish Planning Policy). It wishes to see the latter replaced by a bullet point recognising the importance of certain landscapes and habitats (such as wetlands and peatlands). I can see that there is an argument for adjusting the balance of environment types referred to. However, the plan's support for commercial forests is qualified by the expression "where appropriate", and is justified in relation to the roles which they play, as set out in the authority's response. The authority's approach in this section cannot be criticised as inappropriate, and should therefore not be disturbed.

Energy from waste

16. With reference to representation E2/1, energy from waste is regarded by the authority as one of the alternative technologies mentioned in the Energy section of Diagram 7. Circular 1/2009: Development Planning explains that Scottish Ministers expect strategic development plans to be concise visionary documents, and in that context, there is no need for this plan to enter into further detail.

Biomass

17. Representation E38/2 refers to a research report on the environmental consequences of biomass production, in particular potential risks associated with larger biomass schemes. However, it would not seem appropriate for the strategic development plan to pre-judge the size of biomass developments by specifying within the Energy section of Diagram 7 that they should be small-scale.

Renewable energy

18. The proposed rewording of the Energy section of Diagram 7, suggested in representation E55/5, would weaken the plan's vision. This part of the plan constitutes a vision statement rather than a strategy and, as such, the existing wording of this section is appropriate. The plan recognises that the detail of this vision will be determined by the local development plan process.

Centralised and decentralised energy generation

19. The Energy section of Diagram 7 should be expanded to clarify the authority's recognition that a diversity of supply is required, as detailed in my conclusions on Issue 29 and as reflected in the authority's response to representation E57 under this issue.

On-shore wind energy generation

20. There is no necessity to make direct mention of on-shore wind energy generation in the Energy section of Diagram 7, as suggested in representation E24. This is covered by the expression "other forms of renewable energy."

Environmental legislation

21. Legislation relating to biodiversity, which representation E38/3 advocates for inclusion in the Environmental Legislation section of Diagram 8, is less readily characterised as a strategic driver of change than the legislation already listed. Its addition would not provide any strategic benefit.

Merging/modifying strategic drivers

22. The modifications to the strategic drivers in Diagram 8 proposed in representations E21/3 and E26/1 would blur the distinctions between the 6 categories to the detriment of clarity. It is somewhat misleading to claim that only one of the drivers (Economy and Population) is concerned about the economy, competitiveness and improved prosperity. The first and third columns refer to "sustainable economic growth" and a "sustainable low

carbon economy". The balance to be struck between those growth-related drivers and other drivers is a legitimate matter for the authority to determine; it could not be criticised as patently inappropriate or at odds with government policy.

Delivery resources

23. Representation E55/5 argues that the plan should be responding to the current restraints on resources by recognising, within the Delivery Resources section of Diagram 8, a need to identify locations and projects which can be delivered without major overhead costs.

24. I consider that to do so would deflect from the main strategic thrust of the plan. Moreover, the mechanism for development planning in the city-region to respond to resource issues is set out in Strategy Support Measure 10, as recommended for modification.

Spatial Vision in Diagrams 8 and 9

25. In paragraph 2.2 of their representation, reference E24, the Banks Group contend that there is a discrepancy between the Spatial Vision as presented in Diagrams 8 and 9, which should be corrected. In fact, as the authority explains, Diagram 9 is intended to illustrate some key physical elements of the Spatial Vision and show how they relate to the components making up the Spatial Development Strategy. As both the link between those key elements and Diagram 8, and the illustrative nature of that selection of elements are somewhat unclear, some words of clarification should be added to paragraph 4.1.

Reporter's recommendations:

1. Modify the Energy section of Diagram 7 to read:

"As an adjunct to centralised generation, decentralised distributed power plants, based on alternative technologies, will be located across the city region exploiting opportunities to develop biomass, combined heat and power and other forms of renewable energy. In the long term, the balance should shift from decarbonised centralised energy from the National Grid to decentralised energy generation based on alternative renewable fuels."

2. Add to paragraph 4.1 the following:

"Diagram 9 selects key elements from Diagram 8 to illustrate how the components of the Spatial Development Strategy are linked to the delivery of some of the key physical elements of the Spatial Vision."

Issue 5	Spatial Development Strategy Model	
Development plan reference:	Section 4 The Spatial Development Strategy model	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E5/3 Mr Michael and Mr Roger Jones E6 Quarriers E11/3 Ashfield Land E14/3 Land Synergy E15/3 Bellisle Developments Ltd E21/2 National Grid Property Ltd E46/2 Susan Barnes E49/2 Jackton & Thorntonhall Community Council E52/8 Mactaggart and Mickel (Homes) Ltd. E55/2 Homes for Scotland E56 Ravenscraig Ltd. E62 Scottish Association for Public Transport</p>		
Provision of the development plan to which the issue relates:	<p>Introduction (pages 16 and 17) The Spatial Development Strategy model (pages 18 to 21) Community Growth Areas (page 19, paragraph 4.15)</p>	
Planning authority's summary of the representation(s):		
<p>The representations in this section fall into four categories:</p> <p>1) <u>Specific Development Agendas</u> E21/2 National Grid Property Ltd The Development Corridor concept is considered a simplified strategic theoretical model. The Proposed Plan promotes the restoration and regeneration of brownfield sites especially those in need of remediation whether located within or outwith the Development Corridor. This particularly applies to former gas works sites where a high value end use such as retailing is required to ensure their remediation. There has been a lack of progress in developing such sites and this is likely to continue in the foreseeable future. Therefore the Strategic Development Plans and the Local Development Plans should take a very positive and proactive approach towards securing high value after uses on such sites.</p> <p>E52/8 Mactaggart and Mickel (Homes) Ltd. Promote immediate further edge expansion of existing communities as a key plank of the Spatial Vision in support of sustainable economic growth.</p> <p>E62 Scottish Association for Public Transport Stronger prioritisation of delivery and a stronger justification for a 'step-change' in sustainable transport modes, including text to justify operational action on transport efficiency and usage. Whilst acknowledging the 'compact city' model, it advocates distributed growth along sustainable transport corridors.</p>		

2) Amendment to the Spatial Vision and related Spatial Development Strategy**E49/2, E49/3 Jackton & Thorntonhall Community Council**

Remove a key component of the Spatial Vision namely plan-led community growth areas and thus its key role within the Spatial Development Strategy.

3) Spatial Strategy Component and its Spatial Impact**E46/2 Susan Barnes**

Given the on-going delays and implementation issues associated with the Community Growth Areas clarification should be given to ensure there remains scope for localised development.

E55/2 Homes for Scotland

In order to deliver the housing requirements it will be necessary to augment those Community Growth Areas which can be progressed with a range of other locations.

E56 Ravenscraig Ltd.

Promote a wider strategic significance of the spatial impact and catchment of the Ravenscraig Flagship Initiative.

4) Greenfield/Brownfield**E5/3 Mr Michael and Mr Roger Jones, E6 Quarriers, E11/3 Ashfield Land, E14/3 Land Synergy, E15/3 Bellisle Developments Ltd**

Reliance on solely brownfield sites, which in the current economic climate are likely to be more ineffective than greenfield sites, could stifle the ability to offer a range and choice of sites required by Scottish Planning Policy.

Modifications sought by those submitting representations:1) Specific Development Agendas**E21/2 National Grid Property Ltd**

Former gasworks locations should be given a high priority for development with supplementary text added to the fifth bullet point in paragraph 4.5 Page 18 namely "recycling and reusing brownfield land giving priority to sites in need of remediation such as former gasworks sites."

E52/8 Mactaggart and Mickel (Homes) Ltd.

The Spatial Development Strategy should have an additional row in Diagram 9 for 'Sustainable Economic Growth' This change will then flow through to all sections of the Spatial Development Strategy, with an explanatory column on pages 18 namely:

Sustainable Economic Growth

"In the immediate post recession era in a period of limited investment and development, it is imperative that the GCVSDP provides the parameters for sustainable economic growth as part of its Spatial Development Strategy. This an interim strategic focus on the sustainable growth of existing settlements that have infrastructure capacity and the ability to accommodate development, providing that environmental considerations are also taken into account. This will have the benefit of stimulating the GCVSDP economy, allowing for construction jobs to be created and for developers to meet housing demand without being hampered in the short term with unrealistic and insurmountable infrastructure burdens."

E62 Scottish Association for Public Transport

A stronger prioritisation of key elements of delivery is sought in paragraphs 4.2, 4.3.

Paragraph 4.6 should be reworded to highlight the potential for relatively low cost measures to improve operational efficiency and raise overall capacity and usage, especially where existing routes and other unused formations and tunnels are well-suited to meeting a higher proportion of existing corridor demand and demand arising from potential development.

2) Amendment to the Spatial Vision and related Spatial Development Strategy

E49/2, E49/3 Jackton & Thorntonhall Community Council

Remove circles from Green Infrastructure" and "Greening the Economy" columns in the Community Growth Areas line of Diagram 9.

Add the following sentence to paragraph 4.14

'Notwithstanding this recovery it is now apparent that the capacity offered by the CGA's will not be required until well after the end of the current planning horizon'

Replace paragraph 4.15 in its entirety with the following

'As a result of the factors discussed in the preceding sub-section CGA's are no longer required and should be removed from the established land supply with immediate effect.'

3) Spatial Strategy Component and its Spatial Impact

E46/2 Susan Barnes

Insert at end of paragraph 4.15 the sentence

'It is recognised that Community Growth Areas will be require to be augmented by local scale development at local centres, proposals for which should be considered by local planning authorities on their planning merits.'

E55/2 Homes for Scotland

Delete the final sentence of paragraph 4.15 and replace with

'The CGA's remain a cornerstone of the housing land supply, but planning authorities must take a realistic view of their short, medium and long term effectiveness at the time of preparing Local Development Plans.'

Add a final sentence to paragraph 4.15

'These aims should also inform the choice of additional housing land allocation in LDP's'

E56 Ravenscraig Ltd

Amend paragraph 4.12 by deleting "the southern area of the North Lanarkshire" and insert "Lanarkshire and the eastern" and delete "their surrounding small communities" and insert "the wider area".

4) Greenfield/Brownfield

E5/3 Mr Michael and Mr Roger Jones, E6 Quarriers, E11/3 Ashfield Land, E14/3 Land Synergy, E15/3 Bellisle Developments Ltd

The Strategic Development Plan should not rely solely on brownfield land to met its' housing land requirements but should provide flexibility required in the provision of housing land to reflect current economic climate's impact on the delivery of brownfield housing land.

Summary of responses (including reasons) by planning authority:

1) Specific Development Agendas

E21/2 National Grid Property Ltd

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification on the grounds that the Strategic Development Plan Vision and

Strategy is predicated on the regeneration, renewal and planned sustainable growth of the city-region and brownfield land, of all categories, is a primary plank of both Vision and Strategy. Former gasworks locations are only one aspect of that brownfield resource and merit equal treatment with other components of the resource.

E52/8 Mactaggart and Mickel (Homes) Ltd.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification on the grounds that sustainable economic growth is already integral to the Spatial Vision and its delivery via the Spatial Development Strategy. Diagram 9 is focused on the structural parameters of sustainable economic growth as they define the Spatial Vision, and on the land-use strategy necessary for their delivery.

The entire Proposed Plan, its Spatial Vision and Spatial Development Strategy are founded upon meeting the Scottish Government's challenge of sustainable economic growth, the Scottish Government's Scottish Planning Policy, page 6, sections 33 and 36 (Supporting Document 1) and in the Scottish Government's 'A Low Carbon Economic Strategy for Scotland' Ministerial Foreword, pages 13 to 15 and 19 (Supporting Document 2).

As such, the Proposed Plan provides the relevant strategic context and parameters for local development plans and other strategies to deliver sustainable economic growth. Sustainable development locations are central to the Vision/Strategy relationship and are reflected in the Flagship Initiatives, the Strategic Economic Investment Locations, and in the Community Growth Areas of the Strategy, the latter the result of a robust exercise in the preceding Glasgow and the Clyde Valley Joint Structure Plan 2006 (Technical Report TR6/06 'Assessment of Potential Areas for Urban Expansion' April 2006, Glasgow and the Clyde Valley Joint Structure Plan) (Supporting Document 3) to identify sustainable growth of communities providing capacity and opportunity to meet long-term growth sustainably.

The proposed modification promoting a generic context for further growth opportunities beyond the community growth areas and the urban land resource would be inappropriate to the strategic direction framed by Diagram 9. It would serve only to weaken the Strategy and its drive for sustainable economic growth by adding further development land to an already significant resource but in locations which are inherently less sustainable than those Community Growth Areas already identified.

A further increase in development land over and above the existing supply has significant potential to foster long-term urban sprawl in direct contradiction of sustainable economic growth, of long-term strategy, of climate change mitigation and a low-carbon future.

The basis of the proposed modification is presented as the stimulation of sustainable economic growth and employment in the construction industry. The Glasgow and the Clyde Valley Strategic Development Planning Authority would refute this assertion that the development land supply is constraining sustainable economic growth, that supply exists in abundance and has not and is not being developed because of market conditions and depressed demand (Royal Institute of Chartered Surveyors, June 2011) (Supporting Documents 4, 5 and 6) unemployment, mortgage availability, lack of confidence, inflation, public sector cut-backs etc. not lack of a generous land supply.

As the economy improves and consumer confidence returns, experience has shown that levels of 'effectiveness' of development land also increases. Coupled with already generous supplies of 'effective' housing land – more than sufficient to meet demand to 2025, this trend will serve to increase simultaneously the volume of 'effective' land.

E62 Scottish Association for Public Transport

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the

proposed modification on the grounds that the Proposed Plan already addresses the issues raised – prioritisation of investment. The Proposed Plan is founded on an approach which has a sharp focus on priorities, Section 4, Spatial Framework 5 (pages 60 to 63). These are reflected in a spatial development strategy which fundamentally integrates the linkages between the future low carbon economy (page 9), the energy paradigm shift from carbon to non-carbon (page 55), and sustainable transport modes (pages 28 to 31). The modification seeks a level of detail which is incompatible with the new form of Strategic Development Plan as proposed in legislation - concise in terms of Vision and Strategy.

Whilst supporting the overall vision of a ‘compact’ city-region, the representation seeks to promote development in sustainable locations within a twenty (20) kilometre distance of Glasgow. This issue is already addressed throughout the Proposed Plan as a primary structural component of the Spatial Development Strategy with just such development provisions in sustainable transport locations, Community Growth Areas (page 19), Strategic Economic Investment Locations (pages 24 and 25), a Network of Strategic Centres (pages 52 and 53), all predicated upon a step-change direction towards sustainable public transport corridors (pages 29 to 31).

E62 Scottish Association for Public Transport

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification on the grounds that that it seeks to introduce detail which is incompatible with text setting out the overall Strategy Development Model upon which the Proposed Plan is founded. Matters such as, operational efficiency, track capacity, unused transport structures, are considered more relevant to a Regional and/or Local Transport Strategy than a Proposed Plan.

2) Amendment to the Spatial Vision and related Spatial Development Strategy

E49/2, E49/3 Jackton & Thorntonhall Community Council

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications on the grounds that the thirteen Community Growth Areas identified in the Glasgow and the Clyde Valley Joint Structure Plan 2006 are an integral element of the legacy Metropolitan Development Strategy and were designated as sustainable long-term growth communities to meet the demands of the future low carbon economy and the demands of future net in-migration. Diagram 9 reflects how central to the long-term Spatial Vision is ‘green infrastructure’ and the ‘green economy’ and how it is reflected in the Spatial Development Strategy components. Therefore in terms of the long-term development of the Community Growth Areas under sustainability principles (The Glasgow and the Clyde Valley Joint Structure Plan 2006 (page 24) (Supporting Document 7)), ‘green infrastructure’, green network, green belt, and ‘green’ active travel are key requirements of their master-planning process. The proposed modification would only serve to reduce the sustainable development focus in the master-planning process contrary to the Spatial Vision.

3) Spatial Strategy Component and its Spatial Impact

E46/2 Susan Barnes, E55/2 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to paragraphs 4.14 and 4.75. It is considered that any additional local-scale housing land requirement is dealt with sufficiently through Strategic Support Measure 10.

E56 Ravenscraig Ltd.

The Glasgow and the Clyde Valley Strategic Development Planning Authority notes the

alternative view put forward in this modification related to the spatial impact of the Ravenscraig 'Flagship Initiative'. This strategy element is integral to the overall Strategy model and is a key element of the re-structuring of that part of Lanarkshire. As such, its catchment description is a question of judgement.

4) Greenfield/Brownfield

E5/3 Mr Michael and Mr Roger Jones, E6 Quarriers, E11/3 Ashfield Land, E14/3 Land Synergy, E15/3 Bellisle Developments Ltd

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it considers the Proposed Plan provides for both a balance of both brownfield and greenfield locations (2009 Housing Land Supply split was 70% brownfield, 30% greenfield) and, through Strategy Support Measure 10, flexibility to allow prevailing market conditions to be considered by local planning authorities. In the context of delivering a sustainable development strategy and vision it is considered appropriate that the Strategic Development Plan gives preference in the first instance to development on brownfield sites.

Reporter's conclusions:

Former gasworks sites

1. The objective listed in paragraph 4.5 as "recycling and reusing brownfield land" reflects Scottish Planning Policy. PAN33: Development of Contaminated Land (revised 2000) adds the option for planning authorities to allocate high value end uses for some contaminated sites with high remediation costs in "situations where the anticipated benefits of remediation are significant enough for them to take priority over other policy objectives". That is a selective and site-specific approach. I see no justification for the proposed plan to apply that approach as a general priority for sites requiring remediation such as former gasworks sites, as sought by representation E21/2. The plan's balanced approach seems more likely to achieve the multiple objectives listed in paragraph 4.5.

Sustainable economic growth

2. The new wording suggested in representation E52/8 is intended to allow the release of additional land for housing in locations with modest infrastructure requirements. It is claimed that this would allow developers to meet housing demand and would create construction jobs. As acknowledged in the conclusions on Issue 20, more detailed analysis in local development plans may reveal that existing land supply in some locations will not realistically be able to deliver sufficient houses to meet the five year supply throughout the plan period. In such circumstances, it may be necessary for those plans to allocate additional effective housing land. However, that is not something which can be dealt with by an across-the-board relaxation of strategy without damage to that strategy and its drive for sustainable economic growth.

Efficiency, capacity and usage

3. The rewording of paragraph 4.6 suggested in representation E62 would introduce an inappropriate level of detail for a strategic development plan.

Prioritisation, etc

4. Prioritisation and development along appropriate corridors are already addressed in the plan. Further detail is not necessary given the strategic nature of the plan.

Community Growth Areas

5. Whilst development in many of the Community Growth Areas appears to be stalled

currently, they are essentially a longer-term response to the demands of net in-migration. Representations E49/2 and E49/3 offer no evidence to support their claims that “the capacity offered by Community Growth Areas will not be required until well after the end of the current planning horizon.” Community Growth Areas form an integral part of the plan’s strategy and should remain. It is appropriate for Diagram 9 to indicate that “Green Infrastructure” and “Greening the Economy” are key requirements for Community Growth Areas, in the interests of promoting sustainable development.

6. The concern expressed in representation E55/2 that local development plans should take a realistic view of the effectiveness of Community Growth Areas is dealt with principally in the conclusions and recommendations for Issue 18.

Local scale development

7. Any additional local scale housing requirement, as suggested in representations E46/2 and E55/2, should be dealt with by Strategy Support Measure 10, as modified (see Issue 27 and the Annex which follows it).

Ravenscraig

8. As the authority puts it, the spatial impact of the Ravenscraig Flagship Initiative is a question of judgement. Representation E56 differs from the authority on this matter, but I have no evidence to support a change in the plan.

Greenfield/brownfield

9. The housing land supply which the proposed plan relies upon contains both brownfield and greenfield locations. The conclusions and recommendations on housing issues, especially Issues 13, 17 and 27, set out how local development plans should respond to questions of effectiveness and delivery of both brownfield and greenfield land, and thereby addresses the concerns raised in representations E5/3, E6, E11/3, E14/3 and E15/3.

Reporter’s recommendations:

No modifications.

Issue 6	Strategy Support Measure 2: Longer-term Potential Strategic Development Initiative	
Development plan reference:	Strategy Support Measure 2: Longer-term potential strategic development initiative	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
E17 James Graham E52/9 Mactaggart and Mickel (Homes) Ltd. E60/2 Scottish Natural Heritage		
Provision of the development plan to which the issue relates:	Paragraph 4.17 (page 20) Strategy Support Measure 2 (page 20)	
Planning authority's summary of the representation(s):		
<p>E17 James Graham Considers reference to the Lomond Canal project is not appropriate and that the River Leven is the major natural asset in the area.</p> <p>E52/9 Mactaggart and Mickel (Homes) Ltd. Strategic Support Measure 2 should be split into two parts, 2A 'long term' and 2B 'short term' in order to provide a stimulus for sustainable economic growth over the first five years of the plan.</p> <p>E60/2 Scottish Natural Heritage In order to support the aims of the Proposed Plan, the Strathleven Corridor Study should consider all the environmental constraints which exist in the study area, the cumulative impacts of any development, the overall quality of the existing Corridor, and a cost benefit analysis of any proposal as additional requirements for consideration under Strategy Support Measure 2.</p>		
Modifications sought by those submitting representations:		
<p>E17 James Graham Seeks the removal of references to the Lomond Canal proposal in paragraph 4.17.</p> <p>E52/9 Mactaggart and Mickel (Homes) Ltd. Seek a new Strategy Support Measure 2B - Sustainable Economic Growth, supporting the short term development and expansion of settlements where infrastructure capacity and environmental considerations were taken into account.</p> <p>E60/2 Scottish Natural Heritage Seek specific wording added to the 2nd paragraph in Strategy Support Measure 2, namely the study should address</p> <ul style="list-style-type: none"> • all the environmental constraints which exist in the study area, • the cumulative impacts of any development, • the overall quality of the existing Corridor a cost benefit analysis of any proposal. 		

Summary of responses (including reasons) by planning authority:**E17 James Graham**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it considers proposals such as the Lomond Canal, which has the potential to form a navigable link between Loch Lomond and the Forth and Clyde Canal, to be a strategically significant opportunity worthy of further consideration as part of the Strathleven Corridor longer-term development potential initiative (Strategy Support Measure 2). Consequently reference to the Lomond Canal proposal in paragraph 4.17 is appropriate. The implications for the River Leven are a matter for West Dunbartonshire Council and partners to consider as part of the Strathleven Corridor Study.

E52/9 Mactaggart and Mickel (Homes) Ltd.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it considers Strategy Support Measure 2 to be an initiative related specifically to the area comprising West Dunbartonshire. It proposes that West Dunbartonshire Council, working with others, considers the long term potential of the Strathleven Corridor. Strategy Support Measure 2 is specific in that geographical focus of the Strathleven Corridor and its surrounding geography and is not to be applied Glasgow and the Clyde Valley wide.

E60/2 Scottish Natural Heritage

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification in that it considers the matters to be addressed by West Dunbartonshire Council, through Strategy Support Measure 2, are not exhaustive and are a matter for West Dunbartonshire Council to define in conjunction with strategic partners. Given the important role the natural heritage will play in this initiative, the Glasgow and the Clyde Valley Strategic Development Planning Authority reasonably would expect Scottish Natural Heritage to be one of those strategic partners thereby ensuring the matters raised by them would be adequately considered during the process of joint working and agreement on a longer-term strategic initiative in that north-western sector of the city-region.

Reporter's conclusions:**Lomond Canal project; River Leven**

1. The planning authority, together with West Dunbartonshire Council and others, see potential for the proposal to form a new canal link between Loch Lomond and the Forth Clyde Canal to support strategically significant development opportunities in the Strathleven Corridor. Although that position is disputed in representation E17, I have been provided with no substantive evidence to justify recommending modification. As a strategic project, the canal is worthy of mention in the proposed plan. The merits of the River Leven, as promoted by the respondent, are for the council and its partners to consider as part of the corridor study.

Strathleven Corridor: short term stimulus

2. Representation E52/9 contends that the Strategic Support Measure 2 should include a stimulus for sustainable economic growth in the Strathleven Corridor over the first 5 years of the plan. The authority's interests clearly lie in strategic matters which in this case constitute the long term potential of the Strathleven Corridor. The question of short term growth falls outwith the larger project framework. It would represent a local issue. West Dunbartonshire Council, whose area encompasses the corridor, would therefore be the

appropriate authority to consider it.

Strathleven Corridor: additional requirements

3. In response to a request for further information, Scottish Natural Heritage has confirmed that it has withdrawn representation E60/2 on the basis that the relevant Habitats Regulations Appraisal tests have been met through future development of the West Dunbartonshire Local Development Plan, and because the proposal relates to a study which will not of itself cause any impacts on the Endrick Water Special Area of Conservation.

Reporter's recommendations:

No modifications.

Issue 7	Strategy Support Measure 3: Strategic Economic Investment Locations	
Development plan reference:	Section 4 Spatial Development Strategy Spatial Framework 1 Competitiveness	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
E28 Bishopton Action Group E32 Strathleven Regeneration C.I.C. E40 Walker Group (Scotland) Ltd E53/2 SRG Estates E56 Ravenscraig Ltd E59 Ryden		
Provision of the development plan to which the issue relates:	Strategy Support Measure 3 (page 22) Schedule 2 (page 24) Schedule 14 (page 63)	
Planning authority's summary of the representation(s):		
<p>E28 Bishopton Action Group The promotion of the location at Bishopton as a Strategic Economic Investment Location as identified in Schedule 2 and Schedule 14 of the Proposed Plan will lead to more intensive use of car-based commuting on the motorway network. It is not a central location with access to universities and higher education facilities and a more appropriate location would be in the centre of Paisley close to University and higher education facilities. Erskine Riverside industrial area has only had very limited development over a long period and Bishopton Strategic Economic Investment Location only adds to this surplus of industrial land.</p> <p>E32 Strathleven Regeneration C.I.C. The proposed Lomondgate Strategic Economic Investment Location should have Green Technologies added to the list of its key sectors. The locational characteristics of Lomondgate, the desire of the development partners to develop a green energy centre, the presence of Aggreko to attract green technology and the close proximity to Her Majesties Naval Base Clyde to seek diversity into renewables are presented as reasons for adding this key sector.</p> <p>E40 Walker Group (Scotland) Ltd Lack of clarity in the wording contained in Strategy Support Measure 3 implies some absolute safeguarding of sites for only those key sector uses set out in Schedule 2. It is important to ensure that identifying specific roles and functions for Lomondgate Strategic Economic Investment Location does not preclude business with other roles which have a site or locational specific requirement to locate at Lomondgate.</p> <p>E53/2 SRG Estates Recognition should be given to the potential for renewable energy developments linked to the proposed distribution and logistics opportunity at Poniel, including Broken Cross, Happendon Wood and Dalquhandy. Planning applications are currently being prepared by SRG Estates for three windfarms at Dalquhandy, Poniel and Broken Cross.</p> <p>Provision should also be made for appropriate research and development “test” sites away from urban locations which could support a number of existing and future green</p>		

technologies e.g. wind, biomass, geothermal, PV solar, pumped storage hydro and some forms of bio-energy.

E56 Ravenscraig Ltd

Schedule 2 does not reflect the fact that Ravenscraig can perform a much wider role than the key sectors of Business and Financial Services and Construction.

E59 Ryden

Potential for a Strategic Economic Investment Location at Badenheath, near Cumbernauld as this site could accommodate a single user storage and distribution centre/data centre.

Modifications sought by those submitting representations:

E28 Bishopton Action Group

The Bishopton location should be removed from Schedule 2 and Schedule 14 as a Strategic Economic Investment Location.

E32 Strathleven Regeneration C.I.C.

Schedule 2 and Schedule 14 should be modified to add “Green Technology” within the key sectors allocated to the Lomondgate Strategic Economic Investment Location.

E40 Walker Group (Scotland) Ltd

To clarify Strategic Economic Investment Location key sectors do not preclude other economic activity being promoted - amend paragraph 4.20 (page 22). Add to end of paragraph “... in response to local requirements...”nor does it preclude other uses in Strategic Economic Investment Locations where driven by the location criteria of business and where there is no prejudice to national locational priorities for key sectors.”

In third paragraph of Strategy Support Measure 3, Strategic Economic Investment Locations (page 22) after the final sentence “...for uses set out in Schedule 2 on Diagram 11 add “with other uses being supported which positively extend the permanent employment potential of the Strategic Economic Investment Locations, where locational requirements exist.”

E53/2 SRG Estates

Recognition should be given in Schedule 2 and Schedule 14 to the potential for renewable energy developments linked to the proposed distribution and logistics opportunity in the south of the region at Poniel, including Broken Cross, Happendon Wood and Dalquhandy.

Within Paragraph 4.19 (page 22) provision should be made within the Strategic Development Plan for appropriate research and development “test” sites which may be away from urban locations. These locations could support a number of existing and future “green technologies” e.g. wind, biomass, geothermal. PV solar, pumped storage hydro and some forms of bio-energy.

E56 Ravenscraig Ltd

Within Schedule 2, Ravenscraig Strategic Economic Investment Location key sectors the text should refer to all forms of economic development.

E59 Ryden

The Strategic Development Plan should acknowledge the potential of the Badenheath site as Strategic Economic Investment Location for development as a single user storage and distribution centre/data centre.

Summary of responses (including reasons) by planning authority:**E28 Bishopton Action Group**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it considers it not appropriate that the Bishopton Strategic Economic Investment Location be removed from Schedule 2 and Schedule 14.

- The Bishopton Strategic Economic Investment Location was selected to support the Scottish Government's Key Sectors, Scottish Enterprise's locational priorities and the growth in re-balancing economic sectors (Proposed Plan Background Report 1).
- The Bishopton Strategic Economic Investment Location is considered an opportunity location contained within the Community Growth Area (Approved Glasgow and the Clyde Valley Joint Structure Plan 2006) and has been identified as having high levels of accessibility by sustainable transport.
- Planning consent has been granted in outline by Renfrewshire Council for 138,000 square metres of Industrial (Class 5)/ Business (Class 4) (paragraph 1, Supporting Document 1).

E32 Strathleven Regeneration C.I.C.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification. The Lomondgate Strategic Economic Investment Location was identified as an opportunity location requiring promotion for investment based upon its identified role and function supporting the key sectors of

- Business and Financial Services
- Creative and Digital Industries; and
- Tourism

as set out in Background Report 5 (Sections 4.2 and 4.3, Supporting Document 2). The long term future economic role of Lomondgate is expected to be considered as part of the longer-term Strathleven Corridor Study proposed under Strategy Support Measure 2. This study is expected to consider, amongst other issues, the potential for development of the 'green economy'.

E40 Walker Group (Scotland) Ltd

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification for the following reasons -

- Defining specific roles and functions in terms of the Strategic Economic Investment Locations allows the Spatial Development Strategy to focus and support the promotion for investment on future key economic sectors which are central to the longer-term Vision for the city-region.
- Seeking to encourage other local, non-key sector uses on Strategic Economic Investment Locations will dilute this focus.
- The active encouragement of non-key sector uses within Strategic Economic Investment Locations would detract from their ability to respond to their defined role and function.
- Local uses should be promoted and developed through Local Development Plans on other non-key sector economic locations.

E53/2 SRG Estates

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification.

- The respondent fails to clarify the links between the Poniel Strategic Economic Investment Location's key roles and functions of Distribution and Logistics and the potential wind farm planning application locations at Broken Cross, Happenden Woods and Dalquhandy.
- The Green Technology role and function is adequately supported within other Strategic Economic Investment Locations within the city region. The Glasgow and the Clyde Valley Strategic Development Planning Authority does not consider it appropriate to add Green Technology to Poniel key sectors in Schedule 2 or Schedule 14.
- Paragraph 4.19 supports Glasgow City centre and its surrounding area as the focus for research and development for new green energy due to its inherent accessibility and mix of economic activity and employment. The respondent fails to make a case for the need for research and development green energy "test sites" which require be located away from urban locations.

E56 Ravenscraig Ltd

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification.

- It considers that defining specific roles and functions for individual opportunity Strategic Economic Investment Locations allows the Spatial Development Strategy to focus on the promotion for investment for the future key sectors.
- Simply to allow all forms of economic activity within the Ravenscraig Strategic Economic Investment Location key sectors in Schedule 2 would remove the objective of supporting the Scottish Government's key sectors and Scottish Enterprise's locational priorities.
- It would lose the focus to support specific roles and functions within a new re-balancing of the economy towards a low carbon future.

E59 Ryden

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification.

- As part of the East Dunbartonshire Local Plan Examination Report, the Reporter was of the view that a site search into the location for a distribution centre/data centre should be part of the Strategic Development Plan process (paragraphs 3, 4 and 5, Supporting Document 3).
- The 2009/10 Industry, Business and Office Monitoring Report demonstrates that within the Strategic Development Plan area, there are 948.86 hectares of Marketable Land Supply available of which 464.43ha is Brownfield in (paragraph 10, Table 2, paragraph 33 and Table 13, Supporting Document 4). In the context of a strategic sustainable development focus and 'compact city' model, there is therefore a more than adequate supply of designated, readily available and well accessed Brownfield sites which should be targeted for such development before the need for a site search for a new Greenfield site is required.
- At this stage the location does not meet the criteria for selection as an opportunity Strategic Economic Investment Location (Sections 4.2 and 4.3, Supporting Document 2).

Reporter's conclusions:**Bishopton**

1. The basis for the inclusion of Bishopton as one of the strategic economic investment locations in Glasgow and the Clyde Valley has been clearly explained and set out in Background Report 5. Planning permission has been granted for a substantial area of business and industrial floorspace and the assessment has confirmed that the location has a high level of accessibility by sustainable transport. Its development as part of the community growth area would contribute to the plan's aspirations not only for the area's future economic growth, but also for the development of sustainable communities.

Lomondgate

2. The potential of Lomondgate to accommodate businesses related to green technologies can be properly assessed in the Strathleven Corridor Study. It would be premature to include that as one of its key sectors now.

3. With regard to the wording of Strategy Support Measure 3, in the context of a strategic development plan I consider it appropriate for it to emphasise the defined roles and functions for each location as set out in Schedule 2, and to confirm that their safeguarding will be a matter for the relevant local development plans. It is not necessary for this plan to refer to other uses.

Poniel

4. The potential for developing wind farms around Poniel or at other locations throughout Glasgow and the Clyde Valley is addressed separately in the plan. The suitability of particular strategic economic investment locations for accommodating firms in the green technologies sector is a separate matter. In that respect, there is no compelling evidence to add sectors other than 'distribution and logistics' to those identified for Poniel.

5. There may be some potential requirement for test sites for particular green technologies, but I do not consider that to be a matter which requires to be addressed in the strategic development plan.

Ravensraig

6. It is appropriate that, for the strategic economic investment locations identified in the strategic development plan, it should also identify the key sectors of the future economy which they are intended to accommodate and promote. It would therefore be inappropriate to indicate that any and/or every form of economic development would be acceptable at Ravensraig. Strategy Support Measure 3 confirms that it will be for the local development plan to put measures in place to safeguard its role and function.

Badenheath

7. The basis for the inclusion of the strategic economic investment locations in Glasgow and the Clyde Valley identified in Schedule 2 has been clearly explained and set out in Background Report 5. It is apparent that Badenheath has not been subject to the same assessment process and, in view of the ample supply of marketable land for business and industry, I agree that it would be inappropriate to add the greenfield site at Badenheath to the strategic economic investment locations at this stage.

Reporter's recommendations:

No modifications.

Issue 8	Competitiveness	
Development plan reference:	Section 4: Spatial Development Strategy Spatial Framework 1 Competitiveness	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
E47 Ayrshire Joint Planning Unit E48 North Ayrshire Council E62 Scottish Association for Public Transport		
Provision of the development plan to which the issue relates:	Spatial Framework 1 Competitiveness (paragraph 4.38, page 23 and paragraph 4.39, page 28)	
Planning authority's summary of the representation(s):		
<p>E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council Given its location and proximity, Ayrshire's role in adding to the critical economic mass and agglomeration economies of the Glasgow conurbation should be recognised in the same way as Edinburgh which is fully acknowledged as an opportunity to be developed. In particular Ayrshire's role in relation to the recognised need to attract skilled labour to service the skill needs of the new growth sectors should be recognised and facilitated through improved transport links between Ayrshire and Central Glasgow.</p> <p>E62 Scottish Association for Public Transport Querying the likely transport implications of some of the city-region's future low-carbon economy particularly that 'people will commute further and wider to take up employment in key economic growth locations'. This contradicts evidence from the National Travel Survey of reducing levels of internal personal travel and a shift away from traditional commuting peaks as more people work at least part of their time at home and also spread the times of commuting and other trips related to work.</p>		
Modifications sought by those submitting representations:		
<p>E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council Text should be added to page 23 to recognise the wider city region functions provided by Ayrshire and text added to paragraph 4.39 to recognise A737 corridor improvements.</p> <p>E62 Scottish Association for Public Transport Questions the view set out in paragraph 4.28 that 'people will commute further and wider to take up employment in key economic growth locations.'</p>		
Summary of responses (including reasons) by planning authority:		
<p>E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council the Glasgow and the Clyde Valley Strategic Development Planning Authority reject the proposed modifications as it considers</p> <ul style="list-style-type: none"> the real focus of the Ayrshire representations to be on their transport linkages (amendments to paragraph 4.39 being their particular focus) and seeking Glasgow 		

and the Clyde Valley Strategic Development Plan Proposed Plan justification for priority investment in key transport schemes in Ayrshire.

- in order to achieve that objective, recognition in the Proposed Plan of Ayrshire's economic linkages is sought.
- economic and social interaction between the Ayrshire sub-region and the city-region are well-established in terms journey-to-work, retail and social trips.
- Section 4 Spatial framework 1 (page 23) has a specific focus on fostering increasing economic linkage between Scotland's two major city-regions – the Glasgow and Edinburgh city-regions, for the reason of collaboration to build economic markets.
- it does not seek to elaborate upon established connections between the city-region and other sub-regions such as Ayrshire. Argyll and Bute, Falkirk, and Dumfries and Galloway all have similar economic and social interaction with the Glasgow city-region, but are also not highlighted, even though some of their interaction is equal to that of the Ayrshire sub-region.
- it is not within the mandate of the Glasgow and the Clyde Valley Strategic Development Planning Authority to identify and promote priority transport proposals in Ayrshire or any other adjoining area – that falls to the relevant councils to those areas.
- it is for the Glasgow and the Clyde Valley Strategic Development Planning Authority to acknowledge the relevant interrelationships with adjoining council areas and the relevance of these interrelationships.
- the Proposed Plan does so in paragraph 4.39 and in paragraph 4.41, Diagram12 (Corridors R9, R10 and R11) and Schedule 4 (Corridors R9, R10, R11) where Ayrshire linkages are integral parts of Strategic Transport Projects Review Projects 22, 24 and 26.

E62 Scottish Association for Public Transport

These proposed modifications/queries are rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority as it considers

- the Proposed Plan sets out a future city-region economy founded on re-balancing the current services-focused bias towards a long-term focus on low-carbon and new 'green' technologies/services (page 9, Diagram 5) and Background Report 1 (Supporting Document 1).
- as part of this future economy, it is anticipated (Aecom 2011) that the city-region, in comparison to the Edinburgh city-region (paragraph 4.26 to 4.28), will likely develop its low-carbon economy with a greater proportion of research and development, manufacturing, utilities and resources development within its economic structure (Supporting Document 2)
- based on the aforementioned research (Aecom 2011) conducted for the Glasgow/Edinburgh Collaboration Initiative (Supporting Document 2), this difference in economic structure, whilst fully in line with the Scottish Government's Low-carbon Economic Strategy (Supporting Document 3), may result in a wider spread of commuting as employees travel to relevant locations which are anticipated to be less city-centre focused than an economic structure focused on developing solely 'green' services as their future focus.

- It is therefore essential that the Proposed Plan's provisions for Strategic Economic Investment Locations (pages 22, 24, 25), many of which are geared to service this future 'green' economy, exploit and develop their sustainable transport linkages so as to ensure that travel to work journeys are able to be made sustainably.

Reporter's conclusions:

Role of Ayrshire

1. Representations E47 and E48 express a wish to see Ayrshire's role in the agglomeration economy and provision of skilled labour for the Glasgow conurbation recognised in the same way as Edinburgh, and facilitated with improved transport links between the regions.
2. Circular 1/2009: Development Plans indicates that strategic development plans should be concise and that their spatial strategies should "encapsulate the headline changes that the plan seeks to achieve." The proposed plan has chosen to focus on fostering economic linkages with the Edinburgh city region in order to build economic markets through collaboration. That is a legitimate approach for the planning authority to take given that these are the major city regions within Scotland. It is therefore not required that the plan should give prominence to inter-relationships between Glasgow and the Clyde Valley and other regions, including Ayrshire, albeit some references are made to such linkages in the text and diagrams.

Commuting

3. Representation E62 expresses doubt that evidence supports the wider commuting pattern posited by the plan.
4. Collaboration between Glasgow and Edinburgh city regions is set to grow in order to increase their economic competitiveness. In that context, the statement in paragraph 4.28 of the plan that in the future "people will commute further and wider to take up employment in ... key economic growth sectors" is supported by research for Scottish Enterprise into economic linkages between Glasgow and Edinburgh. This found that an increasingly specialised labour market requiring higher skill levels is likely to result in longer commuting distances as people search further afield for jobs appropriate for their specific skills. In other words, this prediction focuses on workers with specialised skills in key growth sectors. The representation, which refers to evidence on commuting in general and the timing of commuting journeys, is therefore not comparable.

Reporter's recommendations:

No modifications.

Issue 9	Connectivity	
Development plan reference:	Section 4 Spatial Development Strategy Spatial Framework 1 Competitiveness	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E47 Ayrshire Joint Planning Unit E48 North Ayrshire Council E51/3 Scottish Government (Directorate for the Built Environment) E58 Strathclyde Partnership for Transport E62 Scottish Association for Public Transport</p>		
Provision of the development plan to which the issue relates:	<p>Strategy Support Measure 4 (page 26) Strategy Support Measure 5 (page 27)</p>	
Planning authority's summary of the representation(s):		
<p>E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council Relationship of the High Speed Rail proposal on transport connectivity and accessibility to the Ayrshire sub-region.</p> <p>E51/3 Scottish Government (Directorate for the Built Environment) A need to reflect the Ministerial decision on the organisational and process aspects of determining the future of High Speed Rail within and into the city-region.</p> <p>E58 Strathclyde Partnership for Transport Premature to require Glasgow city Council's City Plan 3 to identify a specific site for a terminus without further work being undertaken to identify the transport planning criteria for the selection of the High Speed Rail terminus and how that terminus will integrate with existing regional bus, Subway and rail networks.</p> <p>E62 Scottish Association for Public Transport Questions whether only improvements at Glasgow Airport will benefit the conurbation economy and that both Edinburgh and Prestwick Airports deserve more consideration in the Strategic Development Plan. Additional explanatory material on High Speed Rail required in the Strategic Development Plan with a demand for an inter-governmental agreement on High Speed Rail on location and phasing of its delivery.</p>		
Modifications sought by those submitting representations:		
<p>E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council Specific references should be made to Ayrshire in text where appropriate.</p> <p>E51/3 Scottish Government (Directorate for the Built Environment) Strategy Support Measure 5 should be amended to reflect the role of the Scottish Partnership Group and the likely timing of any certainty emerging as to the preferred location for the terminus and route. Suggested wording is: "Following the identification of a location in central Glasgow for a High Speed Rail</p>		

terminus by the Scottish Partnership Group (which includes Glasgow City Council and other stakeholders), Glasgow City Council and related stakeholders to secure and safeguard related development land ...”

E58 Strathclyde Partnership for Transport

It is suggested that the Proposed Plan be redrafted to be less specific about the requirement on Glasgow City Council and related stakeholders to identify a specific site for a terminus until further work is undertaken to identify the relevant transport planning criteria.

E62 Scottish Association for Public Transport

Glasgow International Airport, paragraph 4.31, goes too far in assuming that only improvements at Glasgow Airport will benefit the conurbation economy and both Edinburgh and Prestwick Airports deserve more consideration. Strategy Support Measure 4, as written, is excessively negative about the potential to reduce road traffic problems on the M8 through modal shift.

E62 Scottish Association for Public Transport

Strategy Support Measure 5 should be revised to:

- highlight interim improvements in Anglo-Scottish rail services prior to planned opening of the initial high-speed services in 2025;
- ensure that the finalised Strategic Development Plan to include agreement by 2012 on high-speed rail terminal facilities in Glasgow. Options include further development of Glasgow Central, a linked Central/St Enoch development and the City Council proposal for a site east from Glasgow Cross, all of which would require good links with the intra-conurbation and national Scottish networks;
- secure inter-government agreement by 2012 on the location and phasing of a high-speed rail route into Glasgow and the upgrading of other sections of route over which High-speed trains will provide through services from 2025. This could include priority for segregating high-speed and lower-speed services from Glasgow to the Carstairs area with connections to Edinburgh (also permitting improved services from Glasgow to Edinburgh, Newcastle and other cities in eastern England)
- make reference to the ability of higher-speed rail and improved frequency to improve links from both Glasgow and Edinburgh to Lancashire and the West Midlands.

Summary of responses (including reasons) by planning authority:

E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council

The Glasgow and the Clyde Valley Strategic Development Planning Authority reject the modifications as it considers appropriate reference to the Ayrshire planning area have been made in the Strategic Development Plan Proposed Plan, in particular with regard to

Ayrshire accessibility

- the Proposed Plan seeks High Speed Rail as a strategic development in the city-region to enhance its outward economic competitiveness. In order for the whole city-region to maximise those competitiveness benefits, the Proposed Plan seeks greater integration between the prospective central terminus and the city-region through improved sustainable transport networks which increase accessibility between core and hinterland.
- these provisions are highlighted in paragraphs 4.39 to 4.42, Diagram 12 and

Schedule 4.

- paragraph 4.41, in particular, highlights the various transport corridor reviews and appraisals currently underway and specifies Project 24 of the Strategic Transport Projects Review (Supporting Document 1) in particular.
- Strategic Transport Projects Review Project 26 (Supporting Document 2) directly focuses on rail improvements on the Inverclyde and Ayrshire Corridors (Corridors R10 and R11 Diagram 12 and Schedule 4).
- Strategic Transport Projects Review Project 22 (Supporting Document 3) focuses on improvements on the A737.
- all of these take into account accessibility to Ayrshire, specified in paragraph 4.39, Ayrshire's connectivity and accessibility issues with the city-region are therefore already inherent in the Proposed Plan.

Strategic Development Planning for Ayrshire

- it is not within the mandate of the Glasgow and the Clyde Valley Strategic Development Planning Authority to take decisions on strategic development planning issues in Ayrshire, simply to recognise the functional relationships between the city-region and adjoining areas and incorporate the necessary strategies to meet the demands of those functional relationships.
- it is not appropriate for the Glasgow and the Clyde Valley Strategic Development Planning Authority in its Proposed Plan to be allocating strategic significance to transport corridors and schemes within Ayrshire, that is the responsibility of the respective Ayrshire councils and is already covered by the Scottish Government's Strategic Transport Projects Review Project 22.
- the duty upon the Glasgow and the Clyde Valley Strategic Development Planning Authority to recognise the functional relationship with Ayrshire is already met within the provisions of the Proposed Plan; paragraph 4.39 and 4.41.

E51/3 Scottish Government (Directorate for the Built Environment), E58 Strathclyde Partnership for Transport

The modifications and the suggested re-wording are noted by the Glasgow and the Clyde Valley Strategic Development Planning Authority as it reflects the Ministerial decision on the future of High Speed Rail. They therefore update the procedural and organisational aspects of preparing the way for planning action for High Speed Rail in the city-region.

E62 Scottish Association for Public Transport

The Glasgow and the Clyde Valley Strategic Development Planning Authority reject the modifications having regard to

Paragraph 4.31 and Strategy Support Measure 4 Glasgow International Airport and sustainable transport access

- Edinburgh and Prestwick airports are acknowledged by the Proposed Plan as serving the city-region to a degree. However, Glasgow International Airport is the predominant airport serving the city-region and as such, is the key strategic priority for the Proposed Plan.
- Strategy Support Measure 4 highlights the nature and relevance of strategic access to Glasgow International Airport and the need for commitment to resolve road access.
- the proposed modification seeks to introduce its own solution to the issue which is inappropriate without fuller consideration of all possible solutions having been tested and a preferred solution agreed.
- it is inappropriate for the Glasgow and the Clyde Valley Strategic Development Planning Authority and its councils to suggest or make planning decisions related to

airport and investment locations outwith the bounds of its spatial mandate.

- respectively as regards Edinburgh and Prestwick, such decisions lie with the Edinburgh and Lothian councils and the Ayrshire councils and with the Scottish Government in respect of its Ministerial responsibilities.

Strategy Support Measure 5 High Speed Rail: meeting the challenge

- it is inappropriate for the Proposed Plan to impose a decision deadline re High Speed Rail on the UK and Scottish Governments and the latter's Partnership Group regarding High Speed Rail.
- the improvements in accessibility within the UK related to High Speed Rail are already covered in the Proposed Plan (paragraph 4.33).
- the issue of interim rail improvements in the UK pre-2025 introduce detail of little relevance to the location and planning of High Speed Rail within the city-region and serves only to undermine the strategic need to focus on High Speed Rail.

Reporter's conclusions:

Accessibility to the Ayrshire sub-region

1. In representations E47 and E48, the respondents wish to see increased recognition of the transport connectivity between the city region and Ayrshire, including high speed rail.

2. Government guidance is that strategic development plans should be concise documents. In that context, I am satisfied that the proposed plan makes sufficient references to accessibility to the Ayrshire sub-region, as detailed in the strategic planning authority's response.

High speed rail terminus and route corridor options

3. Strategy Support Measure 5 directs Glasgow City Council to "take early action to identify a location in central Glasgow for a high speed rail terminus" and to secure and safeguard land. Other authorities within the city region are given similar directions on safeguarding. The danger that these directions have the potential to conflict with the work and remit of the Scottish Partnership Group has been flagged up in representations E51/3 and E58.

4. The group is a body announced by the Minister for Housing and Transport which, among other things, is to consider route options and station locations for high speed rail services in Scotland. Because that work is at an early stage, premature identification of route alignments may cause potential blight and disruption over a prolonged period. Strategy Support Measure 5 should therefore be amended to reflect the role of the Scottish Partnership Group and the likely timing of any certainty emerging as to the preferred location for the terminus and route.

5. Representation E62 wants the proposed plan to demand inter-governmental agreement on the location and phasing of high speed rail delivery, and to go into further detail on high speed rail, Anglo-Scottish rail services and similar matters.

6. It is not within the remit or power of the proposed plan to demand inter-governmental agreement on the location and phasing of high speed rail delivery. Nor would it be appropriate for a strategic development plan to go into further detail on high speed rail, Anglo-Scottish rail services and similar matters, as the respondents suggest.

Airports

7. Representation E62 misrepresents the proposed plan. The plan does not state that

only improvements at Glasgow International Airport will benefit the urban economy, but makes the justifiable comment that the airport is “a key component in the city region’s and Scotland’s economic infrastructure”. Furthermore, the plan does acknowledge the role of Edinburgh and Prestwick airports in serving the city region.

8. As to the promotion of measures to improve complementary working between the three airports, these are untested ideas which would fall to the airport authorities, local councils and Scottish government to decide, rather than to the strategic development plan.

Transport access to Glasgow International Airport

9. Representation E62 criticises the plan for taking an overly negative view of the potential to reduce road traffic problems on the M8 motorway through modal shift, but this is simply an unsupported opinion.

Reporter’s recommendations:

Replace the first paragraph of Strategy Support Measure 5 by the following:

“Following the identification of a location in central Glasgow for a high speed rail terminus by the Scottish Partnership Group (which includes Glasgow City Council and other stakeholders), Glasgow City Council and related stakeholders are to secure and safeguard related development land, and to secure and safeguard the options for sustainable transport connections between the terminus and the rest of the city region.”

Issue 10	Strategy Support Measure 6: Strategic Freight Facilities	
Development plan reference:	Section 4: Spatial Development Strategy Spatial Framework 1 Competitiveness	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
E22/2 Network Rail E47 Ayrshire Joint Planning Unit E48 North Ayrshire Council		
Provision of the development plan to which the issue relates:	Strategy Support Measure 6 (page 27)	
Planning authority's summary of the representation(s):		
<p>E22/2 Network Rail Consider the current wording of Strategy Support Measure 6 in respect of the safeguarding allocation is too restrictive and should be altered to a more supportive theme rather than a protective theme. Unless a change is made in terms of rail freight sites, this could impact the provision of other rail related activities in the allocated areas. A wider definition would allow the creation of other rail related activities which often share the same basic infrastructure and would inherently protect the long term use. The current wording would inhibit the creation of passenger stations or rail maintenance facilities within the suggested allocation locations.</p> <p>E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council Consider the freight potential of Hunterston and Prestwick Airport to elicit greater focus in the Proposed Plan on transport connectivity between Ayrshire and the city-region and upon key transport schemes within Ayrshire.</p>		
Modifications sought by those submitting representations:		
<p>E22/2 Network Rail Specific re-wording to Strategy Support Measure 6, namely</p> <ul style="list-style-type: none"> • “Measures are required to promote relevant freight and transport investment in such locations”. • “Ancillary land allocations adjacent to such facilities, where appropriate, should be designated for freight and transport related activities or for correlating infrastructure and development which will support the continued use of the main site for freight.” <p>E47 Ayrshire Joint Planning Unit Need for the Strategic Development Plan to give support for enhanced surface transport links between the city region and ports in Ayrshire, particularly to support the development of Hunterston’s deep water transshipment facilities and Glasgow Prestwick Airport, both recognised as a National Developments in National Planning Framework 2.</p> <p>E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council The role which Glasgow Prestwick Airport can and does play in the City Region’s</p>		

international connectivity merits greater recognition in the Strategic Development Plan as does the need for improvements in the capacity of surface transport links to Glasgow Prestwick Airport.

E48 North Ayrshire Council

Given that distribution and logistics is identified as a key growth sector, there is a need for the Strategic Development Plan to give support for enhanced surface transport links between the city region and ports in Ayrshire, particularly to support the development of Hunterston's deep water transshipment facilities and Glasgow Prestwick Airport.

Summary of responses (including reasons) by planning authority:

E22/2 Network Rail

The Glasgow and the Clyde Valley Strategic Development Planning Authority reject the proposed modification on the grounds that

- Strategy Support Measure 6 is designed to ensure that the strategic role of these key freight hubs (Schedule 3) is protected and promoted and that the hubs and their surrounding land is secured against inappropriate development.
- The focus of Strategy Support Measure 6 is clear - it is the delivery of the strategic role of such locations as freight-hubs, central to the future city-region economy and not a loss or erosion of their strategic importance to general rail-associated development or wider development which may seek to exploit rail infrastructure in non-freight-orientated development.
- The focus is upon creating freight hubs and freight parks/infrastructure which support strategic their role e.g. warehousing, 'break-bulk' transshipment, distribution, storage.

Network Rail's re-wording, whilst its promotional focus is acknowledged, has the potential to weaken that strategic role and pave the way for inappropriate development, exploiting tenuous association with freight activity e.g. retail warehousing, business parks, offices.

E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council

The Glasgow and the Clyde Valley Strategic development Planning Authority reject the proposed modification on the grounds that

- It is not within the mandate of the Glasgow and the Clyde Valley Strategic Development Planning Authority to take on strategic development planning responsibilities for Ayrshire, simply to recognise the functional relationships between the city-region and adjoining areas and incorporate necessary strategies to meet the demands of those functional relationships.
- It is not appropriate for the Glasgow and the Clyde Valley Strategic Development Planning Authority in its Proposed Plan to be allocating strategic significance to specific development proposals and transport infrastructure within Ayrshire that is the responsibility of the respective Ayrshire councils and the Scottish Government through its national planning framework, as appropriate.
- The obligation upon the Glasgow and the Clyde Valley Strategic Development Planning Authority is to recognise the functional relationship with Ayrshire is already met within the provisions of the Proposed Plan; paragraph 4.39 and 4.41.

Reporter's conclusions:
<p>Less restrictive safeguarding</p> <p>1. Representation E22/2 wishes to see less restriction on the use of land adjacent to freight transport hubs. It argues that other rail-related activities, such as passenger stations or rail maintenance facilities, often share the same infrastructure and that their development would protect the long-term use. "Symbiotic" activities, such as industry or warehousing, would help to promote investment in the hubs.</p> <p>2. I consider that the strategic planning authority's wish to retain a focus on the strategic function of rail freight hubs is appropriate. The types of use proposed by the respondent would tend to blur that focus to the possible detriment of the strategic function. Moreover, no evidence has been submitted that broader rail-related activities are necessary to protect the long-term use of the hubs.</p> <p>Transport connectivity with Ayrshire</p> <p>3. Representations E47 and E48 wish to see greater significance placed on transport connections between the city region and Ayrshire, especially in relation to the freight potential of Hunterston deep water transshipment facilities and Prestwick Airport (both recognised as National Developments in National Planning Framework 2).</p> <p>4. I am satisfied that the functional relationships between the city region and Ayrshire are sufficiently recognised in the proposed plan, especially in paragraphs 4.39 and 4.40 and in Diagram 12.</p>
Reporter's recommendations:
No modifications.

Issue 11	Strategy Support Measure 7: Sustainable Transport	
Development plan reference:	Section 4 Spatial Development Strategy Spatial Framework 1 Competitiveness	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E22/2 Network Rail E44 Paisley West & Central Community Council E47 Ayrshire Joint Planning Unit E48 North Ayrshire Council E56 Ravenscraig Ltd. E58/1 Strathclyde Partnership for Transport E62 Scottish Association for Public Transport</p>		
Provision of the development plan to which the issue relates:	Paragraphs 4.37 to 4.42 (page 28) Diagram 12 (page 29) Schedule 4 (pages 30 and 31)	
Planning authority's summary of the representation(s):		
<p>E22/2 Network Rail</p> <ul style="list-style-type: none"> • Strategy Support Measure 7 does not describe what the step-change would look like. Policy needs to confirm a vision of the sustainable transport measures it identifies as being required. • Strategy Support Measure 7 should indicate how the Strategic Development Plan should support such change or where change would be resisted if it had an impact upon those identified priorities. Strategy Support Measure 7 does not indicate how the Strategic Development Plan will contribute to facilitate either the option or the founding objective. • The policy vision could include in Schedule 4 the items which the Strategic Development Planning Authority considers important to the delivery of the step-change i.e. improved frequency, routing, journey times, reduction of carbon emission etc. Objectives should be clarified before the identification of options which have been suggested by other parties. By having options without clearly establishing the objectives, the Strategic Development Plan could risk obstructing suitable alternative transport schemes that may arise over the plan period. Without this clarity in objectives any alternative options that come forward, that are not as currently indicated in Schedule 4 of the Strategic Development Plan, would be contrary to the development plan which can constrain effective delivery. <p>E44 Paisley West & Central Community Council</p> <ul style="list-style-type: none"> • With the cancellation of the Glasgow Airport Rail Link proposals, the Strategic Development Plan should be clearer and more definitive in the promotion and support of alternative infrastructure and access proposals for road and/or rail improvements. <p>E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council</p> <ul style="list-style-type: none"> • Greater recognition of the functional links between the City Region and Ayrshire. In 		

particular, greater emphasis on transport links including improvements to the A737 road corridor between Irvine and Glasgow.

E56 Ravenscraig Ltd.

- A new rail station forms part of the planning permission and masterplan for Ravenscraig and this should be listed within the final column of Schedule 4 (Corridor R5).

E58/1 Strathclyde Partnership for Transport

- through the Regional Transport Strategy, Strathclyde Partnership for Transport has identified a list of strategic roads and suggest that these are referenced in the Strategic Development Plan.
- text should be reviewed regarding Strategic Transport Project Review Project 24 and the West of Scotland Public Transport Conurbation Study. Transport projects are under review by Strathclyde Partnership for Transport.
- reference should also be made in paragraph 4.41 of Strategic Transport Projects Review Project 8: Strategic Park and Ride, Strategic Transport Projects Review Project 27: Enhancement to Rail Freight between Glasgow and the Border via West Coast Main Line.
- there is no proposal for extension of the Subway under the modernisation plans and the reference to this should be removed.

E62 Scottish Association for Public Transport:

- the strategy should recognise explicitly that land use strategy can only be a part of a “step change” response to present problems.
- Transport Scotland are still undertaking studies to identify the interventions needed and the two City Centre rail stations are close to capacity and any step change in sustainable transport must address these issues. The finalised Strategic Development Plan should end the uncertainties on this issue.
- the interventions proposed in Strategic Transport Projects Review Project 24 have not been finalised by the Scottish Government or Strathclyde Partnership for Transport. It is not acceptable for the present roads programme to be taken as given when there is yet more delay in completing a phased strategy for public transport improvement. Before the Strategic Development Plan is finalised, this situation must be resolved in urgent discussions leading to Transport Scotland and Strathclyde Partnership for Transport agreement later this year on a clear start to step-change by 2015 and clarification of strategy to 2025 and beyond by the end of 2012.
- such a programme requires more detail than would be appropriate in the new generation of Strategic Development Plans. The crucial requirement is a revision of the Regional Transport Strategy to give effective backing to the concept of step-change starting now rather than delayed for another five years. Nevertheless, there should be close connections and greater synergy between a revised Regional Transport Strategy and the finalised Strategic Development Plan.
- it is not possible to perceive the links between transport and land use strategy unless the Strategic Development Plan itself contains a Map or Diagram referring to key transport proposals, interchange development and land use priorities in a phased programme to 2025. This should be included in a major modification of Strategy Support Measure 7 and a related review of Schedule 4.

- Schedule 4 is too vague, lacks detail and lacks reference to phasing and funding.
- clarification is sought that the transport corridor R9 is to Silverburn Shopping Centre or to Pollok.
- examination is urged for a corridor from the city centre (via Clyde Arc Bridge and Silverburn) to Newton Mearns or East Kilbride.
- Seek addition of enhanced bus links between Glasgow Airport and city centre and also direct from other centres to Glasgow Airport likely to attract reasonable patronage.
- Within transport corridor C3 of the Circumferential Corridors suggest extension to run from East Kilbride or Newton Mearns through Paisley and Glasgow Airport to Clydebank/Dalmuir.
- the modernisation of the Subway is supported as a priority for completion by 2017, as is an interchange at West Street within the south side local rail services and also Glasgow Crossrail services. The reference to a cross-city tunnel be deleted as this is regarded as costly and offers less benefits than the alternative:
 - greater use of existing east-west tunnels across the city;
 - development of Urban Metro;
 - development of Light Rail services on existing rail routes.
- the Association presents a nine point programme of priorities to achieve a realistic approach to step-change either in the finalised Strategic Development Plan or in a revised Regional Transport Strategy completed in 2012.
- suggest that a prominent feature of the Strategic Development Plan should be for interchange improvements and encouragement for most development to be within 500/700 meters of railway stations or quality bus corridor stops.

Modifications sought by those submitting representations:

E22/2 Network Rail

- Strategy Support Measure 7 should confirm the transport measures required by the Glasgow and the Clyde Valley Strategic Development Planning Authority to support its step-change vision and how the Strategic Development Plan will actually contribute to this.
- Schedule 4 should list the items that the Strategic Development Planning Authority considers of importance to the delivery of change i.e. improved frequency, routing, journey times, reduction of carbon emission etc.
- Strategy Support Measure 7 should indicate how the Strategic Development Plan supports such change or where change would be resisted if it had an impact upon those identified priorities.
- Include objectives in Schedule 4 of the Strategic Development Plan.

E44 Paisley West & Central Community Council

The Strategic Development Plan should be clearer and more definitive in the promotion and support of alternative infrastructure and access proposals for road and/or rail improvements to the Airport.

E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council

Greater emphasis on transport links including improvements to the A737 road corridor between Irvine and Glasgow.

E56 Ravenscraig Ltd.

A new rail station forms part of the planning permission and masterplan for Ravenscraig and this should be listed within the final column of Schedule 4 (Corridor R5).

E58/1 Strathclyde Partnership for Transport

- through the Regional Transport Strategy the Strathclyde Partnership for Transport has identified a list of strategic roads (including trunk road network) which are essential to sustaining cross-city and cross region links on strategic corridors and suggest that this is referenced in the Strategic Development Plan namely: M8, A8, A82, A803, A810, A811, A814, A817, A8, A818, A726, A749, A73, A80, M73, M80, M77, M74, A70, A71, A73, A702, A73, A702, A737, A78, A725.
- the text of paragraph 4.41 (Page 28) be reviewed regarding Strategic Transport Project Review Project 24 and the West of Scotland Public Transport Conurbation Study. Mention should also be made in paragraph 4.41 of:
 - Strategic Transport Projects Review Project 8; Strategic Park and Ride. This identifies strategic park and ride sites at Bargeddie (M8), St James (M8), Glasgow South Orbital (M77), Fullerton (M74) and Robroyston (M80).
 - Strategic Transport Projects Review Project 27; Enhancement to Rail Freight between Glasgow and the Border via West Coast Main Line.
- suggest the updated text of Paragraph 4.41 should read: “The SPT West of Scotland Public Transport Conurbation Study (WSCPTS) provides a template for high quality, efficient and integrated public transport system including heavy rail, LRT, Subway, BRT, Quality Bus Corridors with frequency and quality improvements at the centre of the improvements to the extensive existing public transport network. Transport Scotland’s Strategic Transport Projects Review identifies related projects which focus on specific strategic improvements to the transport network. The key STPR projects for Glasgow and the Clyde Valley area are Project 8 Strategic Park and Ride/Park and Choose sites, Project 24 West of Scotland strategic rail enhancements and Project 27 West Coast main line rail freight improvements. Together the WSCPTS and the STPR projects provide a comprehensive strategic plan for transport in the West of Scotland over the lifetime of the GCVSDP. Currently the detailed interventions of these important transport projects in the City Centre and various transport corridors in the Clyde Valley area remain under development and will inform future iterations of the GCVSDP. SPT is currently taking forward Subway modernisation, bus project and BRT projects such as Fastlink.”
- no proposal for extension of the Subway under the modernisation programme and the reference to this should be removed from the City Centre Transport Corridor (page 31).

E62 Scottish Association for Public Transport

- land use strategy can only be a part of a “step change” response to the present situation. The Strategic Development Plan should recognise this explicitly while developing a complementary relationship between transport, land use and energy policies in future budgets and programmes.
- within paragraph 4.40 it is noted that Transport Scotland are still undertaking studies to identify the interventions needed and that the two City Centre rail stations are close to capacity and any step change in sustainable transport must address this issue. The finalised Strategic Development Plan should end the uncertainties on this issue.
- within paragraph 4.41 it is noted that public transport corridors remain under

discussion as part of Strategic Transport Projects Review Project 24 as they have not been finalised by the Scottish Government or Strathclyde Partnership for Transport. Given the powerful argument for shifts to quality public transport as part of the Strategic Development Plan, it is not acceptable for the present roads programme to be taken as given when there is yet more delay in completing a phased strategy for public transport improvement and active travel. Before the Strategic Development Plan is finalised, this situation must be resolved in urgent discussions leading to Transport Scotland and Strathclyde Partnership for Transport agreement later this year on a clear start to step-change by 2015 and clarification of strategy to 2025 and beyond by the end of 2012.

- close connections and greater synergy between a revised RTS and the finalised Strategic Development Plan. It is not possible to perceive the links between transport and land use strategy unless the Strategic Development Plan itself contains a Map or Diagram referring to key transport proposals, interchange development and land use priorities in a phased programme to 2025. This should be included in a major modification of Strategy Support Measure 7 and a related review of Schedule 4 on page 30.
- Schedule 4 is too vague and lacks reference to phasing and funding. Greater detail is needed to help influence decisions by public and private funders and by individuals.
- the fourteen transport corridors listed in Schedule 4 are acceptable but clarification is required that transport corridor R9 relates to Silverburn Shopping Centre or to Pollok.
- examination is urged for a corridor from the city centre (via Clyde Arc Bridge and Silverburn) to Newton Mearns or East Kilbride. Seek addition of enhanced bus links between Glasgow Airport and city centre and also direct from other centres to Glasgow Airport likely to attract reasonable patronage.
- within transport corridor C3 (page 31) suggest extension to run from East Kilbride or Newton Mearns through Paisley and Glasgow Airport to Clydebank/Dalmuir.
- within Glasgow City Centre and Subway section on page 31 it is recommended that reference to a cross-city tunnel is deleted as this is regarded as costly and offers less benefits than the alternative:
 - greater use of existing east-west tunnels across the city;
 - development of Urban Metro;
 - development of Light Rail services on existing rail routes.
- a nine point programme of priorities to achieve a realistic approach to step-change either in the finalised Strategic Development Plan or in a revised Regional Transport Strategy completed in 2012.
- interchange improvements and encouragement for most development to be within 500/700 meters of railway stations or quality bus corridor stops should be a prominent feature of the Strategic Development Plan.

Summary of responses (including reasons) by planning authority:

E22/2 Network Rail

These proposed modifications are rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority.

- The respondent is seeking that the Glasgow and the Clyde Valley Strategic

Development Planning Authority identify specific objectives per transport corridor and the detailed measures to deliver change i.e. improved frequency, routing, journey times, reduction of carbon emission etc. It is the Scottish Government's responsibility, however, through the Strategic Transport Projects Review to address strategic improvements in transport infrastructure and specifically in all rail and strategic road transport matters. Additionally, all bus operations substantially lie with private operators unless as subsidised operations.

- As is stated in paragraphs 4.40 and 4.41, a range of studies have been commissioned by Transport Scotland and Strathclyde Partnership for Transport to help identify the interventions necessary for a step change in sustainable transport and these have not been finalised as yet by the Scottish Government and therefore cannot be included in the Strategic Development Plan.
- Schedule 4 simply sets out the spatial framework of the public transport corridors and related strategic development locations and highlights a range of potential broad-level options and interventions which could meet the need for step-change. In so doing, the Schedule seeks to create a 'direction of travel' for strategic investment by the Scottish Government, the Regional Transport Authority and other investment partners in new sustainable transport modes to support the distribution of strategic development locations.
- Schedule 4 is indicative and Strategy Support Measure 7 makes it clear that the necessary objectives, measures and interventions will only be finalised through agreement between Transport Scotland, Strathclyde Partnership for Transport and the constituent Councils.

E44 Paisley West & Central Community Council

The proposed modification is rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority.

- Schedule 4 (as articulated above) sets out a range of potential public transport interventions and measures which may be applicable within each transport corridor to support strategic development locational priorities.
- Paisley and Glasgow Airport are covered by transport corridors R10 and R11.
- The intervention and detailed measures have not been finalised by the relevant Government agencies and therefore further details cannot be provided within the Strategic Development Plan.
- It is not possible therefore at this stage within the Strategic Development Plan to be clearer and more definitive in the identification, promotion and support of alternative infrastructure and access proposals for road and/or rail improvements along these transport corridors.
- The Strategic Development Plan Proposed Plan can only seek therefore to create a 'direction of travel' towards the need for a step-change in sustainable transport provision and create a plan which becomes a material consideration in the Scottish Government's and Regional Transport Authority's strategic planning priorities for transport.

E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council

These proposed modifications are rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority for the following reasons –

- it is not within the mandate of the Authority to identify and promote priority transport facilities (improvements to A737) in Ayrshire. This is the responsibility of relevant Councils in that area and/or the Scottish Government.
- the Strategic Development Plan Proposed Plan acknowledges the relevant interrelationships with adjoining council areas and Ayrshire in paragraphs 4.39 and 4.41.
- Diagram 12 and Schedule 4 Ayrshire linkages are integral parts of Strategic Transport Projects Review Projects 22 (Supporting Document 1), 24 (Supporting Document 2) and 26 (Supporting Document 3).

E56 Ravenscraig Ltd.

This modification is noted by the Glasgow and the Clyde Valley Strategic Development Planning Authority.

E58/1 Strathclyde Partnership for Transport:

The proposed modification is rejected by the Glasgow and the Clyde Valley Strategic Development Planning Authority.

- The focus of Schedule 4 and Diagram 12 is on public transport corridors which may or may not relate to the strategic road and trunk road network.
- The Regional Transport Strategy (Supporting Document 4) already lists these twenty-seven roads and these can also be reflected in individual Local Development Plans and Local Transport Strategies.
- The rewording of paragraph 4.41, as proposed, would present in more detail the West of Scotland Public Transport Conurbation Study as being high quality, efficient and integrated and containing a number of interventions and measures. As this is still a study and yet to be finalised by Strathclyde Partnership of Transport, it would be premature to detail the eventual outcomes. Paragraph 4.41 uses the Strategic Transport Projects Review Project 24 (Supporting Document 2) as an example of the type of intervention project that could make a step change provision and was not intended to list all the Strategic Transport Projects Review projects including Project 8 (Supporting Document 5) and Project 27 (Supporting Document 6). Without the details being concluded on the specific programmes, measures and investment it would be premature to state that "Together the WSCPTS and the STPR projects provide a comprehensive strategic plan for transport in the West of Scotland over the lifetime of the GCVSDP".

The Glasgow and the Clyde Valley Strategic Development Planning Authority notes there is no proposal for extension of the Subway under the current modernisation plans.

E62 Scottish Association for Public Transport

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications -

- Strategy Support Measure 7 acknowledges that Transport Scotland, the Strathclyde Partnership for Transport and the constituent local authorities need to agree the specific programme of sustainable transport investments and measures in order to achieve the necessary step change in sustained transport to 2035. The timescales to achieve this agreement are outwith the control of the Glasgow and the Clyde Valley Strategic Development Planning Authority.
- the respondent notes that the investment programme would benefit from detail.

However, this would be inappropriate in the new generation of Strategic Development Plans. Once a new programme agreement has been concluded, it will be through a revision of the Regional Transport Strategy that the detail will be presented and this can then result in a review of Strategy Support Measure 7 and any necessary detail can be presented as appropriate in Schedule 4.

- R9 relates to both locations as Silverburn Shopping Centre is located within Pollok Town Centre.
- the suggestion for a corridor from the city centre (via Clyde Arc Bridge and Silverburn) to Newton Mearns or East Kilbride and also within C3 of the Circumferential Corridors (page 31) to run from East Kilbride or Newton Mearns through Paisley and Glasgow Airport to Clydebank/Dalmuir is simply an alternative view to that adopted by the Glasgow and the Clyde Valley Strategic Development Planning Authority.
- the addition of enhanced bus links between Glasgow International Airport and city centre and also direct from other centres to Glasgow Airport as part of transport corridor R11 is an issue for the Regional Transport Strategy, BAA and individual local authorities to assess and promote. The Glasgow and the Clyde Valley Strategic Development Planning Authority considers, from a strategic perspective, that this matter is covered with reference in R11 to improving core bus frequencies and routing.
- the deletion from the City Centre and Subway section on page 31 of reference to the cross-city tunnel is considered an issue for the Regional Transport Strategy and individual local authorities to assess and conclude. As it stands a cross-city tunnel remains a potential option for future implementation until such time as the Scottish Government and the Regional Transport Authority conclude their deliberations on the specific content of Project 24 (Supporting Document 2) of the Strategic Transport Projects Review.
- the nine point programme presented by the representee as priorities to achieve step-change are acknowledged but as these would be matters more appropriately take forward as part of the upcoming review of Regional Transport Strategy (Supporting Document 4) by Strathclyde Partnership for Transport.

Reporter's conclusions:

Paragraph 4.40

1. The authority is not in a position in the proposed plan to resolve questions about capacity limits at Glasgow's two main rail stations, as urged in representation E62.

Paragraph 4.41

2. The timescales around achieving agreement on sustainable public transport improvement are outwith the control of the strategic planning authority.

3. There is no need to refer to further examples of intervention projects in this paragraph, as requested in representation E58/1. The West of Scotland Public Transport Conurbation Study has not yet been finalised, so it would be premature to detail its outcomes.

Strategy Support Measure 7

4. Strategy Support Measure 7 acknowledges the need for a co-ordinated approach to sustainable transport, including with respect to land use, transport and related programmes. More detail, including of future budgets and programmes, (as requested in representation E62) is not required for this plan.

Schedule 4

5. Representation E22/3 seeks more detail on how the proposed step change in public transport would look, and on the objectives which would lie behind the potential options listed in Schedule 4. In fact, some, but not all, of those objectives are listed in column four of the schedule. The authority are content to leave the detail and the objectives to other bodies, and in this plan to indicate a “direction of travel” for strategic investment. That is their prerogative, and I see no basis for recommending the type of modifications requested.

6. Further detail on phasing and funding of public transport options, as requested in representation 62, is not required for this plan.

7. The establishment of a new rail station at Ravenscraig is a significant public transport change, which forms part of the planning permission and masterplan for that area. It should be added to the potential options in the fourth column of Schedule 4, as advocated in representation E56.

8. Strathclyde Partnership for Transport point out that current modernisation plans do not include extension of the subway. Consequently, the references to extension contained in the fourth column against City Centre should be deleted.

9. With regard to the suggestions in representation E56 for a corridor from the city centre to Newton Mearns or East Kilbride and a corridor from those places to Clydebank, there are no grounds for preferring these to the strategic planning authority’s position. Enhancing bus links to Glasgow Airport is sufficiently covered in the reference under corridor R11 to improving core bus frequencies and routeing. Deletion of the cross-city tunnel is a matter for other bodies. At present it remains an option. The suggested nine point programme of priority projects to achieve a step change is more appropriate for consideration in a review of the Regional Transport Strategy. Other suggestions in this representation are too detailed for the strategic development plan.

Access to Glasgow International Airport

10. The relevant government agencies have not as yet finalised access and infrastructure measures following the cancellation of the Glasgow Airport Rail Link project. The authority therefore considers that it is not possible for the plan to be more definitive on this matter, as representation E44 wishes. I have no basis for recommending otherwise.

Transport links with Ayrshire

11. The plan provides sufficient acknowledgement of the relevant interrelationships with adjoining council areas, including Ayrshire, in paragraphs 4.39 and 4.41, Diagram 12 and Schedule 4. The modifications suggested in representations E47 and E48 are not necessary.

Road network

12. It would not be appropriate to give details of strategic road networks in this part of the plan, which focuses on public transport corridors.

Reporter's recommendations:

1. Add "new rail station at Ravenscraig" to the fourth column of Schedule 4 against radial corridor R5.
2. Remove the reference to extending the subway in the fourth column of Schedule 4 against City Centre.

Issue 12	Green Network	
Development plan reference:	Spatial Framework 2: Environmental Action	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E13/1 sportscotland E28 Bishopton Action Group E47 Ayrshire Joint Planning Unit E48 North Ayrshire Council E58 Strathclyde Partnership for Transport</p>		
Provision of the development plan to which the issue relates:	Introduction and bullet point 3 (page 32, paragraph 4.43)	
Planning authority's summary of the representation(s):		
<p>E13/1 sportscotland Wording on page 32, paragraph 4.43 should be amended to reflect the need to protect as well as provide for access networks and natural leisure facilities.</p> <p>E28 Bishopton Action Group Schedule 1(f) of the Glasgow and Clyde Valley Joint Structure Plan 2006 lists Bishopton as a green network priority. In addition paragraph 8.28 of the same document states "Joint working on the Strategic Green Network Partnership for Glasgow and the Clyde Valley has confirmed that there are potential new greening projects which will support the metropolitan flagship initiatives and planned Community Growth Areas". It specifically listed Bishopton Community Forest Park. These projects were supposed to complement local green space initiatives and the government's action programme for tackling urban dereliction through promotion of Woodlands in and Around Towns programme (WIAT) and the Central Scotland Forest. The omission of these major pieces of environmental infrastructure adds to the case that Bishopton is an unsustainable and unviable Community Growth Area.</p> <p>E47 Ayrshire Joint Planning Unit The prominence given to the Glasgow and Clyde Valley Green Network and woodland planting as part of the Central Scotland Green Network is to be welcomed. However the need for this to coordinate with and be integrated with an Ayrshire Green Network through the development of strategic green corridors linking Ayrshire and the Glasgow City Region as part of Central Scotland Green Network, as recognised in National Planning Framework 2, needs formal strategic recognition in the Strategic Development Plan. Such enhancements to the Central Scotland Green Network should seek to achieve multiple benefits wherever possible (page 32, paragraph. 4.45-47).</p> <p>E48 North Ayrshire Council The prominence given to the Glasgow and Clyde Valley Green Network and woodland planting as part of the Central Scotland Green Network is to be welcomed. However, North Ayrshire Council objects to the lack of recognition in the Strategic Development Plan or its Strategic Environmental Assessment of the scope for integration with an Ayrshire</p>		

Green Network through the development of strategic green corridors linking Ayrshire and the Glasgow City Region as part of the Central Scotland Green Network.

E58 Strathclyde Partnership for Transport

Suggest inserting a reference to linking Green Network walking and cycling routes to public transport hubs, where possible (page 19).

Modifications sought by those submitting representations:

E13/1 sportscotland

Add additional text in bold (paragraph 4.43, bullet point 3):

‘promoting health and recreation by **protecting and** providing sustainable access networks and natural leisure facilities.’

Change the term ‘natural leisure facilities’ in paragraph 4.43, bullet point 3 which is not a term that is considered commonly used to ‘**outdoor sport and recreation**’ is more commonly used and understood.

E28 Bishopton Action Group

Lack of the green network provision set out in the 2006 Structure Plan should influence the decision to identify Bishopton as a Community Growth Area.

E47 Ayrshire Joint Planning Unit

Textual change to ensure integration across Central Scotland Green Network area.

E48 North Ayrshire Council

The Strategic Development Plan should incorporate wording to this effect in paragraph 4.46:

“Such enhancements to the CSGN should seek to achieve multiple benefits wherever possible.”

E58 Strathclyde Partnership for Transport

Insert a reference on page 19 to linking Green Network walking and cycling routes to public transport hubs, where possible.

Summary of responses (including reasons) by planning authority:

E13/1 sportscotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority notes the additional text proposed for bullet point 3.

With regard to use of the term ‘natural leisure facilities’ the Glasgow and the Clyde Valley Strategic Development Planning Authority considers this to be appropriate terminology following discussions with its constituent local authorities and environmental stakeholders.

E28 Bishopton Action Group

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification. The Glasgow and the Clyde Valley Strategic Development Planning Authority strongly supports the continued need for Community Growth Areas as a key part of its Spatial Vision and Spatial Development Strategy. In this context the integration and development of the green network remains an integral part of all Community Growth Areas and the continuation of this approach is implicit within the Proposed Plan (paragraph 4.15). Specific green network opportunities for each Community Growth Area therefore are to be integral to Masterplans (Supporting Document 1) and detailed development proposals as each Community Growth Area moves forward in the planning process.

In terms of the Green Network component of the Bishopton Community Growth Area, the

Contextual Masterplan, Structural Landscape and Development Sub Areas was approved by Renfrewshire Council on 30 September 2011. This masterplan includes numerous references to green network thinking and delivery including paragraphs 2.4 and 2.11 (Supporting Document 2) which states:

“In turn, the movement routes within the development area need to link with existing or proposed foot-paths and cycleways in the wider environment. This includes the Community Woodland Park which is to be created on that part of the former factory which lies to the immediate west of the development area and Core Paths. The network of Core Paths is defined on the Core Paths Plan issued by Renfrewshire Council.”

E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council

Glasgow and the Clyde Valley Strategic Development Planning Authority notes the proposed modification.

E58 Strathclyde Partnership for Transport

Glasgow and the Clyde Valley Strategic Development Planning Authority notes the proposed modification.

Reporter’s conclusions:

Paragraph 4.43

1. I do not agree that sportscotland’s suggested amendments to the text at paragraph 4.43 would add either clarity or precision.

Community Growth Areas

2. The retention of the community growth areas at Bishopton and elsewhere is dealt with at Issue 18, where no modification is recommended. Given the guidance on the planned development of community growth areas set out at paragraph 4.15 of the proposed plan, I am satisfied that the commitment to securing an effective green network in conjunction with these developments is undiminished.

Paragraph 4.45

3. Paragraph 4.45 already recognises the role of Glasgow and the Clyde Valley’s green network as a component of the Central Scotland Green Network, as well as its contribution to realising a complex range of environmental objectives. In these circumstances, I do not consider that the amendments suggested by North Ayrshire Council and the Ayrshire Joint Planning Unit are necessary.

Green network

4. The role of the green network in contributing to the provision of sustainable access networks is recognised at paragraphs 4.43 to 4.45. At paragraph 4.13 on page 19, the green network is recognised as a programme of positive action to address the need for green infrastructure across the city region, linking urban and rural communities. In this context, I do not consider the amendment suggested by Strathclyde Partnership for Transport to be necessary.

Reporter’s recommendations:

No modifications.

Issue 13	Green Belt	
Development plan reference:	Spatial Development Framework 2: Environmental Action	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E6 Quarriers E13/3 sportscotland E23 Scottish Property Federation E42/1 Lynch Homes E45/1 CALA Homes (West) E51/2 Scottish Government (Directorate for the Built Environment) E52/10 Mactaggart and Mickel (Homes) Ltd. E55/3 Homes for Scotland</p>		
Provision of the development plan to which the issue relates:	Glasgow and the Clyde Valley Green Belt (page 34 paragraph 4.48 and Strategy Support Measure 8)	
Planning authority's summary of the representation(s):		
<p>E6 Quarriers The Proposed Plan should provide a strategic policy position that would allow limited incursions into the green belt to meet shortfall for delivery of affordable housing.</p> <p>E13/3 sportscotland Page 34, paragraph 4.48, bullet 4 would be improved by ensuring the wording used corresponds with that outlined in the Scottish Planning Policy. The organisation is keen to avoid any ambiguity over the purpose of the green belt as it relates to outdoor sport and recreation and want to ensure the Strategic Development Plan is clear on the role of the green belt in this respect.</p> <p>E23 Scottish Property Federation Whilst the importance of the Green Network Strategy is recognised, the respondent does not agree with the proposed green belt designation.</p> <p>E42/1 Lynch Homes, E45/1 CALA Homes (West) The Glasgow and the Clyde Valley Strategic Development Planning Authority does not provide any view or opinion on the need for a green belt boundary review as envisaged in Scottish Planning Policy within the region (Scottish Planning Policy on green belts (paragraphs 159 to 164)). The Proposed Plan needs to set the policy direction for green belt boundary review.</p> <p>E51/2 Scottish Government (Directorate for the Built Environment) Paragraph 161 of Scottish Planning Policy requires Strategic Development Plans to establish the need for a green belt, identify its broad area and set the policy for future development within it. This material is missing from the Proposed Plan. The principal concern is over clarifying the spatial extent of the green belt and the extent of the green belt is not clearly displayed in the maps or in text, beyond the statement that the green belt</p>		

should continue to be designated. Some consistency of approach needs to be imposed by the Glasgow and the Clyde Valley Strategic Development Planning Authority to sufficiently ensure that the strategic aims of this designation are achieved.

E52/10 Mactaggart and Mickel (Homes) Ltd.

It is considered that a strategic review of the green belt boundaries should have been undertaken, setting out future key aims and purposes and that a specific Strategy Support Measure then should have required each Local Development Plan on a consistent basis to review their greenbelt boundaries within the findings of the future key aims and purposes of the green belt as a planning policy.

E55/3 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority should recognise the wider land-use planning objectives of green belts and it should clearly direct a review of boundaries through Local Development Plans to ensure that all development requirements can be accommodated.

Modifications sought by those submitting representations:

E6 Quarriers

The green belt should be reviewed within the city region to ensure that sufficient land exists to support the sustainable growth of rural communities.

E13/3 sportscotland

Page 34, paragraph 4, bullet 4 amended to read:

“Protecting and giving access to open space, and providing for a range of opportunities for outdoor recreation compatible with an agricultural or natural setting.”

E23 Scottish Property Federation

If the Glasgow and the Clyde Valley Strategic Development Planning Authority continues with the green belt designation, suggest that both it and the Green Network Strategy are regularly reviewed and non-conforming sites removed.

E42/1 Lynch Homes, E45/1 CALA Homes (West)

Paragraph 4.45 add the following text:

“Although there are extensive areas of brownfield land across the region, there will be many instances where greenfield land release is a legitimate response to meet the requirements of the strategic development strategy.

In particular, it is recognised that the Green Belt’s inner boundary across the region is too tightly drawn against the existing urban edge and follows ill-defined physical features on the ground.

Consequently, the opportunity should be undertaken to review Green Belt boundaries through the local development plan process to meet the requirements set out in SPP as well as to release land for future development to meet both strategic and local development requirements.”

Paragraph 4.48 add the following text after bullet points:

“Accordingly, the inner boundary of the green belt should be reviewed by the Local Development Plans to meet the physical and other requirements set out in Scottish Planning Policy as well as the future development requirements set out in this Proposed Plan.”

Strategic Support Measure 8 add the following text to the last sentence:
 "...are achieved and the urban areas, towns and villages can expand to meet both strategic and local development requirements.'

E51/2 Scottish Government (Directorate for the Built Environment)

We recommend that the reporter invites the Strategic Development Planning Authority to clarify their view as to what the spatial extent of the green belt should be, and/or imports relevant material from the existing Structure Plan into the Strategic Development Plan sufficiently to ensure that the requirements of Scottish Planning Policy are met.

E52/10 Mactaggart and Mickel (Homes) Ltd.

New Strategy Support Measure requiring a strategic review of the future key aims and purposes of the green belt as a planning policy and providing a framework for green belts to be reviewed in this context by each Local Development Plan.

E55/3 Homes for Scotland

Paragraph 4.48, second sentence
 insert after "key" the words "social, economic and".

Paragraph 4.48, add a new second bullet point:
 "being drawn to provide sufficient development land to meet all likely strategic and local development requirements for at least the next 20 years".

Strategic Support Measure 8, third sentence
 Delete "environmental" to make clear that there are multiple objectives to be met, not just environmental.

Summary of responses (including reasons) by planning authority:

The comments relating to green belt can be split into three categories:

- 1) the need to meet Scottish Planning Policy requirements for green belt review;
- 2) the need for a green belt boundary review and the desire to see some consistency in the form of policy direction within the Proposed Plan; and
- 3) Specific wording changes.

1) Scottish Planning Policy requirements for green belt

E42/1 Lynch Homes, E45/1 CALA Homes (West), E51/2 Scottish Government (Directorate for the Built Environment), E52/10 Mactaggart and Mickel (Homes) Ltd., E55/3 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications.

- In response to meeting the requirements of Scottish Planning Policy (paragraphs 159-163, Supporting Document 1) in relation to green belt, the Glasgow and the Clyde Valley Strategic Development Planning Authority has set out in the Proposed Plan the fundamental principles of green belt and its strategic roles within the terms of a compact city-region and sustainable development model (page 12, Diagram 7, Urban Fabric and Environment).
- The importance of directing development to addressing the long-term vacant and derelict land resource is a priority in sustainable development terms. Alongside the guidance offered in the Scottish Planning Policy, the Glasgow and the Clyde Valley

Strategic Development Planning Authority considers that the Proposed Plan provides clear direction and a sufficiently robust framework for the forthcoming green belt reviews to be undertaken by the individual local authorities as part of the Local Development Plans preparation; in particular the framework

- acknowledges and supports the crucial role of a quality environment in aiding economic competitiveness and aims to protect and enhance the quality, character, landscape settings and the identity of the city and its surrounding towns. The green network concept and green belts are complementary in this respect
- directs planned growth to brownfield sites over greenfield, thus supporting regeneration
- in conjunction with the green network concept, seeks to protect and give access to open space within and around towns
- already supports extensive green belt release to meet the demands of long-term community growth in thirteen different communities sustainably linked to the core of the city-region (page 21, Diagram 10)

E51/2 Scottish Government (Directorate for the Built Environment)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification.

- It considers that the Proposed Plan meets the requirements of Scottish Planning Policy as it relates to Strategic Development Plans and the green belt. This is evidenced in paragraph 4.48 (page 34) which outlines the need for a green belt and its important role in achieving key environmental sustainability objectives.
- The underlying principles of the city vision recognise the important role that a high quality urban fabric and a quality environment have to play in aiding economic competitiveness.
- These roles are further strengthened in Strategy Support Measure 8, 'Green infrastructure: an economic necessity' (page 34) which, in strategy terms, attaches importance to the contribution that green belts make to economic competitiveness and quality of life, in conjunction with positive green network action.
- Moreover, Strategy Support Measure 8 clearly states that the review and designation of inner and outer boundaries of the green belt is unnecessarily detailed for Strategic Development Plan founded on Vision and Strategy and this level of locational detail should be priority for local development plans.
- It is considered that together, the Spatial Vision, paragraph 4.48 and Strategy Support Measure 8 meet the requirements of the Scottish Planning Policy in setting a clear and robust strategic framework for detailed green belt boundary reviews in local development plans.
- It is inappropriate for the Strategic Development Plan to dictate detailed locational specification of green belt boundaries to Local Development Plans. It is part of the Scottish Government's culture change agenda and its new Planning legislation that detailed locational planning is devolved to Local Development Plans working within the broader Vision and Strategy of the Strategic Development Plan. The Proposed Plan meets that demand of the Scottish Government.
- With regard to the lack of a clearly defined green belt, either in mapped form or in text, whilst the Glasgow and the Clyde Valley Structure Plan 2006 contains an

indicative diagram of green belt, this diagram was intended merely to illustrate relatively new concepts. It shows notional annotation of green belt concepts such as green wedges and corridors set within a wider concept of the Green Network.

- It does not intentionally relate specifically to identifiable features on the ground.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority considered the inclusion of similar notional diagrams unnecessarily detailed and potentially misleading for the Strategic Development Plan.

2) Consistency in Green Belt boundary review and policy direction within the Proposed Plan

E6 Quarriers, E23 Scottish Property Federation, E42/1 Lynch Homes, E45/1 CALA Homes (West), E51/2 Scottish Government (Directorate for the Built Environment), E52/10 Mactaggart and Mickel (Homes) Ltd., E55/3 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it considers that in seeking to deliver a Strategic Development Plan which is 'concise and visionary' the repetition of the guidance contained with Scottish Planning Policy within the text of the Proposed Plan is unnecessary.

It is considered that paragraph 4.48 and Strategy Support Measure 8 are of an appropriate level of detail for a Strategic Development Plan and this adequately provides for the required level of consistency across the Glasgow and the Clyde Valley Strategic Development Planning Authority area and that the level of detail sought by the respondents is more appropriately dealt with at the Local Development Plan level.

3) Specific wording changes

E13/3 sportscotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification. The Glasgow and the Clyde Valley Strategic Development Planning Authority recognises the desire to avoid ambiguity over the purpose of the green belt as it relates to outdoor sport. However, in the context of the complementary relationship of green belt and green networks, the Glasgow and the Clyde Valley Strategic Development Planning Authority considers that the spirit of the changes sought by Respondent **E13/3** is already contained within the text of the Proposed Plan.

E42/1 Lynch Homes, E45/1 CALA Homes (West)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to Paragraphs 4.45 and 4.48 and Strategic Support Measure 8 as it considers the proposed wording would undermine the principles of the Strategic Development Plan's Spatial Vision and Spatial Development Strategy.

E55/3 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to Paragraphs 4.48 and Strategy Support Measure 8 on the grounds that

- it considers the proposed wording would undermine the principles of the Strategic Development Plan's Spatial Vision and Spatial Development Strategy.
- It considers that appropriate land allocations for the next twenty years are integral to the Spatial Development Strategy and its focus on a 'compact city-region' model addressing sustainable economic growth and development whilst also meeting the demands of the Scottish Government's climate change legislation and its Planning Policy guidance.

Reporter's conclusions:**Scottish Planning Policy's requirements for green belts**

1. Regarding the role of strategic development plans in relation to green belts, Scottish Planning Policy states that: "In city regions, the strategic development plan should establish the need for a green belt, identify its broad area and set the policy for future development within it."

2. However, here the green belt is already long-established and forms an integral part of existing development plans across Glasgow and the Clyde Valley. Scottish Planning Policy itself specifies the purposes of green belt designation and outlines the policies which should apply to new development within it. The green belt is clearly embedded in the overall strategy and vision of the strategic development plan. The objectives of the green belt are set out at paragraph 4.48 and are clearly consistent with the policy framework set by Scottish Planning Policy. In these circumstances I do not consider that it is necessary for the strategic development plan to contain a diagram to indicate the broad extent of the green belt.

3. In confirming the requirement on local development plans to review the inner and outer boundaries of the green belt in each area, this plan is also consistent with Scottish Planning Policy in the role which it envisages for local development plans. It will be for those plans to demonstrate that the newly delineated boundaries are also consistent with the requirements set by Scottish Planning Policy that they: "Should reflect the long term settlement strategy and ensure that settlements are able to accommodate planned growth. Inner boundaries should not be drawn too tightly around the urban edge, but where appropriate should create an area suitable for planned development between the existing settlement edge and green belt boundary."

4. This approach is reflected in the strategic development plan's requirement set out in Strategy Support Measure 8 that the inner and outer boundaries of the green belt should be reviewed in each local development plan. These reviews will be undertaken in the context of the need for local development plans also to allocate sufficient land to meet the confirmed housing requirements for each local authority area. Accordingly, this should ensure that the role of the green belt not only remains consistent with, but also helps to realise, the plan's overall vision and strategy for Glasgow and the Clyde Valley.

5. Given my conclusions above regarding the proposed plan's consistency with Scottish Planning Policy, I consider that it would be both unnecessary and inappropriate to include an additional strategy support measure to require a strategic review of the aims and purposes of the green belt, as suggested by Mactaggart and Mickel (Homes) Ltd. It will be for each local development plan to assess whether it is appropriate to release individual non-conforming sites from the green belt.

Consistency

6. I agree that it is not necessary for guidance set out in Scottish Planning Policy to be repeated in the strategic development plan. Both the text at paragraph 4.48 and the terms of Strategic Support Measure 8 are generally consistent with Scottish Planning Policy and provide an appropriate level of detail for this plan.

Specific wording

7. With regard to the fourth bullet point of paragraph 4.48, the wording in relation to the role of the green belt in protecting open space and sustainable access is both appropriate

and sufficient, and the modification suggested by sportscotland would represent unnecessary elaboration.

8. In view of the modifications proposed to be made to the plan in relation to issues concerning housing land (see the Annex following Issue 27), the additional modifications suggested by Lynch Homes, Cala Homes (West) and Homes for Scotland are unnecessary. The review of the inner and outer boundaries of the green belt is required by Strategy Support Measure 8, and is to be undertaken through local development plans. These reviews will therefore also need to take account of the requirements regarding housing land allocations set out in Schedules 6 to 11A and their associated text, and in Strategy Support Measure 10, as well as ensuring that the key environmental objectives are achieved.

Reporter's recommendations:

No modifications.

Issue 14	Forestry and Woodland Strategy	
Development plan reference:	Spatial Framework 2: Environmental Action	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
E11/1 Ashfield Land E28 Bishopton Action Group E53/3 SRG Estates E60/10 Scottish Natural Heritage		
Provision of the development plan to which the issue relates:	Forestry and Woodland Framework (page 34) Diagram 14 Forestry and Woodland spatial framework (page 35)	
Planning authority's summary of the representation(s):		
<p>E11/1 Ashfield Land The recreated plan shows that almost all land surrounding the settlements in the Strategic Development Plan area to the north of Lesmahagow and west of Lanark are preferred for urban fringe woodland expansion. This level of detail is entirely inappropriate within a strategic document and gives the impression of sterilising all urban fringe locations from future development. This effect is compounded by the supporting text, which implies that woodland creation in line with the accompanying plan is essential. Circular 1/2009: Development Planning confirms (Paragraph 14, Page 4) that "Scottish Ministers expect SDPs to be concise visionary documents".</p> <p>E28 Bishopton Action Group Schedule 1f of the Glasgow and Clyde Valley Joint Structure Plan 2006 lists Bishopton as a green network priority. In addition para 8.28 of the same document states "Joint working on the Strategic Green Network Partnership for Glasgow and the Clyde Valley has confirmed that there are potential new greening projects which will support the metropolitan flagship initiatives and planned Community Growth Areas". It specifically listed Bishopton Community Forest Park. These projects were supposed to complement local green space initiatives and the government's action programme for tackling urban dereliction through promotion of Woodlands in and Around Towns programme (WIAT) and the Central Scotland Forest.</p> <p>Diagram 8 of the same document with Diagram 14 Forestry and Woodland spatial framework of the Proposed Plan and the green network areas around Bishopton are significantly different. The majority of the green network area is now categorised as unsuitable for the management or planting of trees. This is the area where the forest park would have been located. This is a significant departure from the 2006 Structure Plan and requires clarification.</p> <p>E53/3 SRG Estates</p> <ul style="list-style-type: none"> • the recognition of biomass planting/woodfuel as an indicative form of development within areas of forestry and woodland; the Green Belt; Natural Resource Search Areas; and, the identified Green Network is fully supported (Plan Principles, Diagram 3). • with specific regard to biomass woodfuel, it is noted that Diagram 14 is primarily 		

based on an analysis of the vacant, derelict and under-used land resource. However, further opportunities for forestry/biomass woodfuel production should also be identified at Damside (see attached plan) and, in the area surrounding Poniel (including Happendon Wood, Dalquahandy and Broken Cross) (plans also attached) where it will benefit from strong links to the proposed distribution and logistics Strategic Economic Investment Location.

- consistent with the requirements of Scottish Planning Policy, development plans should designate specific sites for biomass and energy from waste schemes. At the strategic level, and within the context of biomass woodfuel opportunities identified by Diagram 14, it is requested that further guidance is provided within the Proposed Plan on potential locations for biomass plants.
- it is considered that all of the SRG sites outlined in this representation have the potential to accommodate this type of alternative renewable energy development.

E60/10 Scottish Natural Heritage

Scottish Natural Heritage welcomes the purpose of the Forestry and Woodland spatial framework (page 34-35 and Diagram 14) in setting out spatial priorities for woodland management and expansion but considers that additional wording is required to clarify the role of the Preferred (Urban Fringe) area.

Modifications sought by those submitting representations:

E11/1 Ashfield Land

With the above statement in mind, it is submitted that Diagram 14 and paragraph 4.52 should be removed from the Proposed Strategic Development Plan and replaced with a new paragraph which states:

“Woodland expansion and creation will be considered and supported in those areas identified as Preferred in the Forestry and Woodland Framework where this would not compromise the realisation of the development strategy or the maintenance of an effective housing land supply.”

E28 Bishopton Action Group

No specific modification is sought in relation to the Forestry and Woodland Strategy.

E53/3 SRG Estates

- Diagram 14 - further opportunities for forestry/biomass woodfuel production should also be identified at Damside and in the area surrounding Poniel (including Happendon Wood, Broken Cross and Dalquahandy).
- within the context of biomass woodfuel opportunities identified by Diagram 14, it is requested that further guidance is provided within the Proposed Plan on potential locations for biomass plants.
- allowance for exceptions to Strategy Support Measure 15 where the development of sustainable renewable energy locations do not offend and ultimately work towards the Plan Vision, contributing to a low carbon economy.

E60/10 Scottish Natural Heritage

Recommends the following text be added to Proposed Plan paragraph 4.52:

“The Preferred (Urban Fringe) area in Diagram 14 is used to highlight the great opportunity for public benefit from any woodland expansion close to settlements but does not infer blanket suitability of this area for woodland.”

Summary of responses (including reasons) by planning authority:**E11/1 Ashfield Land**

Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications.

- The removal of the Forestry and Woodland Strategy diagram and the proposed substitute wording would undermine the sustainable development principles of the Strategic Development Plan's Spatial Vision and Spatial Development Strategy vis-a-vis
- Diagram 14 is central to the integration of green network infrastructure and thinking, including the Forestry and Woodland Strategy, with the wider strategic development priorities – economic, social and environmental - of the Plan.
- Diagram 14 highlights the central role of forestry and woodland in the modern metropolitan strategic planning approach and is a key tool for the Forestry Commission Scotland to meet its wide-ranging objectives set by the Scottish Government's Forestry Strategy.
- Diagram 14, therefore, is an integral component of the Development Strategy and central to its realisation.

E28 Bishopton Action Group

The area surrounding Bishopton and its Community Growth Area in Diagram 14 remains classified as a preferred area for woodland development and is wholly in line with integrated green network infrastructure as part of that long-term expansion of the village. However, the Glasgow and the Clyde Valley Strategic Development Planning Authority notes that the respondent seeks clarification of differences between Diagram 8 of the current Structure Plan (2006) and Diagram 14 of the Proposed Plan.

E53/3 SRG Estates

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this proposed modification.

- The Proposed Plan is a high level strategic plan and all diagrams contained therein are indicative.
- Specifically naming individual sites in relation to forestry/biomass woodfuel production would not be in keeping with the spirit and focus of the Proposed Plan.
- Diagram 4: 'Sustainable location assessment' provides a strategic tool the Development Management authorities to assess development proposals and whether they are in accordance with the Spatial Development Strategy of the Proposed Plan or may be deemed 'exceptions'. The Proposed Plan therefore already contains an appropriate tool in this respect.
- Further consideration of individual planning applications will be addressed on their own particular merits by the relevant local planning authority.

E60/10 SNH

The Glasgow and the Clyde Valley Strategic Development Planning Authority notes the proposed modification.

Reporter's conclusions:**Forestry and woodland: preferred (urban fringe) area**

1. In representation E60/10, Scottish Natural Heritage expressed concern that Diagram 14 identifies a 1 kilometre "urban fringe" around settlements in the city region, implying

blanket suitability for forestry and woodland in those areas. However, they have submitted further information to indicate that they withdraw their representation on the basis of discussions with the strategic development plan team which resulted in an agreement:

(1) to add the following text (or similar) to paragraph 4.52 of the proposed plan:

“The Preferred (Urban Fringe) area in Diagram 14 is used to highlight the great opportunity for public benefit from any woodland expansion close to settlements but does not infer blanket suitability of this area for woodland.”

(2) to amend the Glasgow and Clyde Valley Forestry and Woodland Strategy supporting document to the proposed plan so that it includes separate strategic frameworks for four different types of woodland and that these incorporate additional landscape sensitivities for these woodland types.

2. I propose to recommend the first of those modifications. The second falls outwith my remit.

3. Ashfield Land (representation E11/1) are concerned that the same annotation on Diagram 14, together with related supporting text, would give the impression of sterilising all urban fringe locations from future development.

4. The suggested new text would clarify the role of Preferred (Urban Fringe) areas and protect unsuitable areas from the establishment of new woodlands. The same amendment would also go some way to addressing the concerns of Ashfield Land. Additionally, paragraph 4.49, bullet point 5, draws attention to the role of forestry in brownfield land recycling through planting, with the advantage of not sterilising the land from future development potential. Paragraph 4.55 emphasises that the Preferred Area status of urban fringe woodland creation on Diagram 14 is equivalent to an areas of search model – hence the “preferred” status. The same paragraph suggests that some 3,800 hectares within the urban fringe may feasibly be promoted for biomass woodland, but this is only a small proportion of the total underused, vacant or derelict urban fringe resource. Consequently, as the strategic planning authority confirms, there remains plenty of room for other elements in the urban fringe, including development, subject to local decision-making.

5. The authority also confirms that the Preferred (Urban Fringe) areas are not exclusive in their application. Other provisions of the plan, including Green Network, Community Growth Areas, economic development locations, energy, and drainage, take in urban fringe areas. That should be made clear in the text of the plan.

Bishopton

6. Bishopton Action Group (representation E28) argue that one of the major factors for selecting Bishopton as the site of a Community Growth Area was that “Expansion of the current settlement could ... enable the creation of a green network and recreation opportunities within and adjoining the settlement through the creation of the Bishopton Forest Park”. However, they state that the area to the south of Bishopton which was intended for the forest park is now classified in Diagram 14 as unsuitable for the management or planting of trees.

7. As the strategic planning authority explains, the concept of Bishopton Forest Park, as identified in the 2006 structure plan, has now evolved into Bishopton Community Woodland Park. The latter forms part of the masterplan for the Royal Ordnance Factory site approved by Renfrewshire Council in 2009. The woodland park extends over 682 hectares around the southern side of an area identified for mixed use development. The

masterplan emphasises the overall wooded character of the site. The area indicated on Diagram 14 as unsuitable for forestry was based on the Macaulay land capability for forestry mapping classification of this area as built up, and related to the extent of the Royal Ordnance Factory operations. Detailed planning may indicate potential for woodland expansion within the “unsuitable” area. On this basis, I am satisfied that the aim of creating a green network and recreation opportunities within and adjoining the settlement has not been compromised. This element of support for the Bishopston Community Growth Area is therefore unaffected.

Biomass planting/woodfuel

8. Representation E53/3 contends that in addition to the recognition of biomass planting/woodfuel production as an indicative form of development compatible with various environmental designations in Diagram 3, further opportunities should be identified at Damside and the Poniel area. However, I agree with the authority that the proposed plan should maintain its focus on the strategic level. There would be opportunity for the company to make a case for particular sites in terms of Diagram 4: Sustainable Location Assessment.

9. I consider that further guidance on potential locations for biomass plants, as requested, is more appropriate for a detailed planning document.

Reporter’s recommendations:

Add the following text to paragraph 4.52 of the proposed plan:

“The Preferred (Urban Fringe) area in Diagram 14 is used to highlight the great opportunity for public benefit from any woodland expansion close to settlements but does not infer blanket suitability of this area for woodland, or necessarily exclude other uses.”

Issue 15	Surface Coal Search Areas	
Development plan reference:	Section 4 Spatial Development Strategy Spatial Framework 2 Environmental Action	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E1 CoalPro E4 The Coal Authority E27 Scottish Resources Group E47 Ayrshire Joint Planning Group E48 North Ayrshire Council E63 Hillhead Community Council</p>		
Provision of the development plan to which the issue relates:	Diagram 15 (page 37)	
Planning authority's summary of the representation(s):		
<p>E1 CoalPro, E4 The Coal Authority, E27 Scottish Resources Group, Proposed Plan should more explicit with regard to the status of the area east of Shotts as a Search Area and that Diagram 15 should have the appropriate symbology to reflect that status.</p> <p>E4 The Coal Authority The number of Search Areas within the Proposed Plan should be expanded to include Renfrewshire and East Dunbartonshire.</p> <p>E47 Ayrshire Joint Planning Group, E48 North Ayrshire Council Additional investment in transport infrastructure in Ayrshire, including rail, sea and road, required to cater for the potential flows between source (Glasgow and Clyde Valley area) and point of consumption (Hunterston) in terms of carbon capture and storage and a focus on the potential for a proposed 'clean' coal power station.</p> <p>E63 Hillhead Community Council Opposition to further surface coal extraction in the city-region and/or the need for the Proposed Plan to be stricter in its content on how such extraction is to be controlled.</p>		
Modifications sought by those submitting representations:		
<p>E1 CoalPro, E4 The Coal Authority, E27 Scottish Resources Group The area to the East of Shotts should be identified as a broad area of search for surface coal with appropriate symbology and notation, include the words 'Shotts Area' after 'Slamannan Plateau, added to Diagram 15.</p> <p>E4 The Coal Authority Areas of Search to be identified within East Dunbartonshire and Renfrewshire with appropriate symbology added to Diagram 15.</p>		

E47Ayrshire Joint Planning Group, E48 North Ayrshire Council

Strategy Support Measure 9 should include consideration of the need for additional transport investment (road, rail, port) and the impacts on the environment, communities and existing transport infrastructure likely to be affected by supplies from the proposed areas of search to the point of consumption particularly to Hunterston.

E63 Hillhead Community Council

The Strategic Development Plan gives carte blanche to extraction in the future, against which there would be no appeal the text (paragraphs 4.56 to 4.59) should be amended so that this issue is less permissive.

Summary of responses (including reasons) by planning authority:**E1 CoalPro, E27 Scottish Resources Group**

The Glasgow and the Clyde Valley Strategic Development Planning Authority notes the proposed modifications:

Area East of Shotts as a Search Area on Diagram 15

- Diagram 15 is intended to set a framework of broad and indicative Search Areas.
- It is for the relevant local authority, through the local development process, to refine and define these areas. North Lanarkshire Council, as the relevant authority and as a constituent member of the Glasgow and the Clyde Valley Strategic Development Plan Authority, has confirmed that as part of refinement process, that the area east of Shotts will be encompassed within the broad indicative area illustrated on Diagram 15.

E4 The Coal Authority

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications for the following reasons:

Additional Search Areas in East Dunbartonshire and Renfrewshire

- East Dunbartonshire and Renfrewshire are densely populated parts of the city-region. It is argued that any remaining shallow and surface coal deposits in these areas are unlikely to be economic and to a significant extent, will have been sterilised by development.
- there is therefore a potential for significant impact upon existing communities if any such deposits are sufficiently economic to justify extraction.
- relevant infrastructure for sustainably transporting any remaining deposits, if capable of being extracted, is not in place and would be difficult to provide, placing a heavy reliance upon the existing pressurised road network.
- Search Areas should therefore avoid densely populated areas of the city-region particularly as this may adversely impact on the quality of their environment and living environment.
- Defining Search Areas where there is already a known comprehensive spread of development constraints e.g. East Dunbartonshire and East Renfrewshire would not meet the clarity and transparency values of the Strategic and Local Development Plans nor in any way would assist the promotion of sustainable economic growth or indeed the future of the industry itself.
- Search Areas should therefore be targeted at parts of the city-region where account has already been taken of the

- sensitivity of critical buffer zones around existing communities;
 - access and relevant sustainable transport infrastructure;
 - sensitivity of environmental resources e.g. flood plains, habitats;
 - potential to restore previously despoiled land.
- in consequence the Lanarkshire sub-region, with significant extant resources in less densely populated areas, an established long-term programme of extraction since the 1980s and with already significant investment in necessary infrastructure, remains the strategic priority for the city-region and which can be maintained to support the UK, Scottish and city-region economies with little impact upon existing communities.

E47Ayrshire Joint Planning Group, E48 North Ayrshire Council

The Glasgow and the Clyde Valley Strategic Development Planning Authority reject the proposed modification for the following reasons

Transport and Infrastructure Improvements in Ayrshire associated with a Potential Power Station at Hunterston

- the Strategic Development Plan is a strategic document focused on Spatial Vision and a Spatial Development Strategy to 2035.
- the submission is predicated on the future development of a 'clean' coal-fired power station at Hunterston. That proposal is the subject of an on-going legal challenge and remains uncertain.
- there are existing markets in both Scotland and the UK which draw upon surface coal extracted in the city-region. Such coals are already transported by a mix of infrastructure, including sustainable modes and relevant infrastructure exists throughout the Lanarkshire sub-region to meet the demands of the broad Search Areas illustrated on Diagram 15.
- It is by no means certain that Hunterston, if developed, will source its coal from the city-region. That will be a decision for the market and the private operators within that market.
- the level of detailed planning and the precision sought in respect of transport infrastructure is a matter for the relevant local planning and transport authorities and should not be sought in a strategic level document.
- it is not the mandate of the Glasgow and the Clyde Valley Strategic Development Planning Authority to identify and promote infrastructure investment priorities in Ayrshire. That issue is a matter for the relevant Ayrshire Authority and as applicable, for the Scottish Government.

E63 Hillhead Community Council

The Glasgow and the Clyde Valley Strategic Development Planning Authority reject the proposed modification as considers the Proposed Plan does not accord 'carte blanche' to future surface coal extraction. It establishes broad indicative search areas which will be defined and refined by the relevant local development plan authorities. As part of any future coal extraction within such areas, there are relevant regulatory provisions to control such workings.

Reporter's conclusions:**Area east of Shotts**

1. Three representations from the coal industry (E1, E4 and E27) urge the addition of the area east of Shotts as one of the broad areas of search for surface coal in Diagram 15. This, they argue, would bring the strategic plan into line with a study associated with the North Lanarkshire Local Plan, and with the 2006 structure plan.

2. However, I accept the strategic authority's position that the diagram sets out a broad indicative framework, and the text at the foot of the diagram makes it clear that surface coal is found North Lanarkshire-wide, and does not preclude the east of Shotts area. Moreover, North Lanarkshire Council have indicated their intention to encompass the east of Shotts area within the indicative area in their local development plan process.

Renfrewshire and East Dunbartonshire

3. In representation E4, the Coal Authority complain that there appears to have been no consideration of areas of search outside North and South Lanarkshire, despite the presence of surface coal deposits, some with little overburden, across other parts of the plan area. They consider that the potential for areas of search in Renfrewshire and East Dunbartonshire should be undertaken.

4. However, the strategic authority has pointed out the range of constraints on coal extraction in Renfrewshire and East Dunbartonshire including: sterilisation of deposits by existing development; amenity impact on more densely populated areas; and lack of transport infrastructure for minerals. This contrasts with North and South Lanarkshire, where additionally there are opportunities to restore previously despoiled land. I accept that view and consider that the strategic priorities for the city region are adequately indicated in the proposed plan.

Transport and infrastructure improvements in Ayrshire to support a potential power station at Hunterston

5. Representations E47 and E48 contend that, as the proposed new coal-fired power station at Hunterston (a National Development) may burn coal from Lanarkshire, the plan should give consideration to additional investment in transport infrastructure between those locations.

6. However, since it is by no means certain that a development at Hunterston would source its coal from Lanarkshire, it would be premature to plan for the associated infrastructure.

Less permissive policy on surface coal extraction

7. Hillhead Community Council (representation 63) seek a less permissive policy on surface coal extraction, arguing that developers are already favourably treated by planning policy.

8. In fact, the proposed plan does no more than identify broad areas of search for coal extraction. It is for the local development plan authorities to define and refine those areas, and to set out the nature of the restrictions they would impose.

Reporter's recommendations:

No modifications.

Issue 16	Wind Energy: Broad Areas of Search	
Development plan reference:	Section 4 Spatial Development Strategy Spatial Framework 2 Environmental Action	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E24 Banks Group E25 East Ayrshire Council E47 Ayrshire Joint Planning Unit E48 North Ayrshire E53/5 SRG Estates</p>		
Provision of the development plan to which the issue relates:	Spatial Framework 2 Wind Energy (page 38) Diagram 16 (page 39)	
Planning authority's summary of the representation(s):		
<p>E24 Banks Group Welcome acknowledgement in the Strategic Development Plan of the significant potential for onshore wind energy development in the city region.</p> <p>However, the broad areas of search illustrated on Diagram 16 appear all to be focused in the south of the city region. It is considered that broad areas of search should be identified in the more northern of the city region, in addition to the areas already identified in the more southern and eastern parts.</p> <p>E25 East Ayrshire Council Object to the extent of the broad areas of search for wind energy as shown in Diagram 16.</p> <p>The broad area of search adjoins East Ayrshire at a number of locations. Of key concern, is the section of the Area of Search that is adjacent to the Muirkirk and North Lowther Uplands Special Protection Area, an internationally protected site, designated for the internationally important rare, threatened and vulnerable birds that it supports.</p> <p>Concern also is raised about the potential for conflict between the nature conservation objectives of the Special Protection Area and the development of wind turbines in this Area of Search.</p> <p>Scottish Planning Policy makes clear the need for spatial frameworks for large scale windfarms to take account of areas requiring significant protection, including those areas designated for their international natural heritage value.</p> <p>Recognising that the proposed Area of Search does not include the Special Protection Area, the Council is concerned that the Area of Search adjoins the boundary. The Council would not expect the area around the Special Protection Area to be identified as an area requiring significant protection; however, it does feel that that the boundary of the Area of Search, as it is currently drawn, is inappropriate and should be drawn back to provide some distance between the Special Protection Area and an area in which windfarms will be actively encouraged, in order to limit any impact on the protected birds.</p>		

In addition to the particular concern relating to the Special Protection Area, there are concerns about the scale of the Area of Search, especially the section that borders East Ayrshire around Muirkirk and the A70 corridor. Given the current level of activity within this area in terms of wind farm development, it is considered that it will not be long before the capacity of the landscape to accommodate windfarm developments is reached.

It is considered that this issue of cumulative impact is not adequately addressed within the proposed Strategic Development Plan and that given that these are strategic and cross boundary issues, the Strategic Development Plan is the place for this to be addressed rather than being left to the relevant local development plans.

E47 Ayrshire Joint Planning Unit

The Strategic Development Plan Proposed Plan advocates a continuation of existing search area approach for large scale wind farms which is in line with previous plans. Given the location of these broad Areas of Search (and potential development outwith them), concerns raised previously by the Ayrshire Councils regarding issues of cumulative impact, still remain, particularly in relation to those search areas adjacent to the East Ayrshire boundary such as the Muirkirk Uplands.

Matters of cumulative impact are significant and as such need to be addressed at the strategic level through the SDP. It is unclear whether this matter has been adequately addressed.

E48 North Ayrshire Council

The Strategic Development Plan Proposed Plan advocates a continuation of the existing search area approach for large scale wind farms which are in line with previous plans. Given the location of these broad 'Areas of Search', concerns raised previously by the Ayrshire Councils regarding issues of cumulative impact still remain, particularly in relation to those search areas adjacent to the East Ayrshire boundary such as the Muirkirk Uplands. Matters of cumulative impact are significant and North Ayrshire Council objects to the Strategic Development Plan and its Strategic Environmental Assessment unless it can be demonstrated that cumulative impacts have been examined and addressed at the strategic level through the Strategic Development Plan with reference to our published Wind Farm Landscape Capacity documents and not left to resolution through Local Development Plans and/or Supplementary Guidance.

E53/5 SRG Estates

Diagram 16 of the Proposed Plan identifies broad areas of search for windfarms. These appear to be unchanged from the Main Issues Report stage. While this representation supports the designation of these areas, it is suggested that there are other areas which have been overlooked when determining the potential for windfarm development. In addition to land at Damside which lies immediately adjacent to the area of search to the south of Shotts, SRG land at Broken Cross, Poniel and parcels of the land at Dalquhandy have significant potential for windfarms as there are no specific constraints or issues which could not be easily mitigated.

Modifications sought by those submitting representations:

Amendments to Diagram 16 Wind Energy: Broad Areas of Search. In particular:

E24 Banks Group

Broad Areas of Search should be identified in the more northern parts of the city region in addition to the areas already identified in the more southern and eastern parts.

E25 East Ayrshire Council, E47 Ayrshire Joint Planning Unit, E48 North Ayrshire Council

The Areas of Search for windfarms should be reviewed, taking fully into account the Muirkirk and North Lowther SPA and the cumulative impacts of operational developments and those in the pipeline. Textual change to Strategy Support Measure 9.

E53/5 SRG Estates

The enlargement of the indicative windfarm search area (Diagram 16) to include the areas to the south of Shotts and directly to the west of Lesmahagow and Douglas i.e. to include the SRG land at Damside, Poniel, Broken Cross and Dalquhandy.

Summary of responses (including reasons) by planning authority:**General**

The Areas of Search illustrated in Diagram 16 'Wind Energy: broad areas of search' (page 39, Proposed Plan) provide an indication of where strategically significant wind energy developments of 20MW or more could be most appropriately located. These areas have been derived following the guidance set out in Planning Advice Note 45 Annex 2: Spatial Frameworks and Supplementary Planning Guidance for Wind Farms (Supporting Document 1) and Background Report 11 Wind Search Areas (Supporting Document 2) which outlines the methodology used by Glasgow and the Clyde Valley Strategic Development Planning Authority.

Banks Group (E24)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification. Diagram 16 provides the appropriate strategic spatial framework for wind energy. Other locations for wind energy proposals are more appropriately considered by the relevant local development planning authority, particularly in the context of landscape capacity, cumulative impact and detailed local considerations.

E25 East Ayrshire Council, E 47 Ayrshire Joint Planning Unit, E 48 North Ayrshire Council

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications.

- The Authority recognises the Muirkirk and North Lowther Special Protection Area as adjacent to the boundary of the broad Area of Search set out in Diagram 16. Guidance contained in Planning Advice Note 45 Annex 2: Spatial Frameworks and Supplementary Planning Guidance for Wind Farms (Supporting Document 1) states that there should be no 'buffer zones' around areas designated for their natural heritage importance (paragraph 62).
- The proximity of any international or national natural heritage designation would be given due consideration if and when specific proposals come forward.
- Regarding the cumulative impacts of operational developments and those in the pipeline, The Scottish Government wishes development plans to identify those areas where there are existing wind farm developments and set out, in relation to scale and proximity of further development, the critical factors which are likely to present an eventual limit to development (Scottish Planning Policy, Supporting Document 3).
- Background Report 11 Wind Search Areas (Supporting Document 2) states "*cumulative effects may be perceived when more than one wind energy development is visible from one viewpoint, when several are seen during a journey*"

and when there is a gradual increase in the number or size of wind farms over time. It cannot be assumed that a cumulative impact will necessarily be negative and therefore assessing cumulative landscape and visual impacts is not straightforward.”

- Determining landscape capacity and cumulative impact requires detailed site analysis across the whole Strategic Development Plan area and in the spirit of the new Planning legislation and the culture change agenda, there is agreement between Glasgow and the Clyde Valley Strategic Development Planning Authority and its eight constituent authorities that site specific issues are the mandate of the constituent authorities.
- In this respect, it is not therefore the role of Glasgow and the Clyde Valley Strategic Development Planning Authority to determine the critical factors which are likely to present an eventual limit to development. Instead, Background Report 11(Supporting Document 2) seeks to strike an informed balance which will underpin knowledgeable detailed analyses of cumulative impact and landscape capacity at the local development plan level of the development plan system.
- In the spirit of the Scottish Planning Policy (Supporting Document 3), Planning Advice Note 45 Annex 2: Spatial Frameworks and Supplementary Planning Guidance for Wind Farms (Supporting Document 1) and the approach of the Glasgow and the Clyde Valley Strategic Development Planning Authority and its constituent local authorities, the analyses undertaken for Background Report 11(Supporting Document 2) largely confirms those areas where there are existing wind farms.
- This can be evidenced in Paragraphs 23-28 of Supporting Document 4 Wind Energy Spatial Framework: Proposed Methodology (March 2010). In relation to landscape capacity and cumulative impact, it devolves the analysis of critical factors which are likely to present an eventual limit to development, to individual authorities based on local circumstances.

E53/3 SRG Estates

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications.

Diagram 16 provides the appropriate strategic spatial framework for onshore wind energy development. Individual sites for wind energy proposals are more appropriately considered by the relevant local development planning authority, particularly in the context of landscape capacity, cumulative impact and detailed local considerations.

Reporter’s conclusions:

Northern part of city region

1. In order for the Scottish Government’s renewable energy target to be met, the Banks Group (representation E24) wish to see broad areas of search identified in the northern part of the city region in addition to those identified in the southern and eastern parts.

2. In its Supporting Document 4, the authority set out its proposed methodology and a review of the technical report on wind energy prepared in connection with the 2006 Third Alteration to the Structure Plan. It contains maps (1-4a) delineating areas covered by constraints which it regards as being strategic in nature. Those constraints are: international and national designations; windfarms of 20MW or over which are existing,

consented or at planning application stage; green belt and 2-kilometre-wide buffers around settlements. Map 5 (Remaining Areas of No Significant Constraints) simply plots those parts of the region not covered by those strategic constraints. The final Map (6: Broad Areas of Search) is a version of Map 5 with the more intricate boundaries rounded.

3. Unfortunately, that methodology is inconsistently applied in that certain northern parts of West Dunbartonshire, East Dunbartonshire and North Lanarkshire which are not covered by the constraints shown on Maps 1-4a, are omitted from Map 6 (Broad Areas of Search). Those parts all fall within Regional Scenic Areas (the Kilpatrick Hills, Campsie Fells and Kilsyth Hills).

4. I also note that the methodology does not follow the recommended approach outlined in Scottish Planning Policy, which states that the spatial framework should identify areas requiring significant protection, areas with potential constraints, and areas of search. Map 6 does not distinguish between the first two types of area. It would be appropriate for local development plans to do so, and that would go some way to addressing the Banks Group's concerns.

5. This requires to be clarified in the accompanying text by stating: which constraints were used in drawing up Map 6; and a requirement on the local authorities in their refinement of the strategy to distinguish those areas outwith the search areas which require significant protection from those with potential constraints.

Area adjacent to Muirkirk and North Lowther Uplands Special Protection Area

6. The North Lowther Uplands Special Protection Area is designated for its rare, threatened and vulnerable bird population. East Ayrshire Council is concerned about the potential conflict with wind energy schemes because the broad area of search abuts the Special Protection Area. It considers that the boundary should be pulled back.

7. I disagree. Government advice is that there should be no buffer zones around areas designated for their natural heritage value. Should an application come forward, the proximity of the Special Protection Area would be given due consideration.

8. Representations E25, E47 and E48 express concern about the scale of the search area, notably that bordering East Ayrshire around Muirkirk and the A70 corridor, where the landscape may soon reach its capacity to accommodate wind farm developments. They consider that cumulative development should be addressed in the plan as a strategic and cross-boundary issue.

9. Whilst Scottish Planning Policy expects issues including cumulative impact to be addressed in the development plan, that does not preclude dividing those issues between strategic and local development plans. In this case, the decision has been taken to leave cumulative impact to the local level. I see no basis to disturb that decision.

Additional potential areas

10. SRG Estates (representation E53/5) draw attention to land at Damside, to the south of Shotts, at Broken Cross, Poniel, and at Dalquhandy as having no specific constraints, but potential for windfarm development. Additionally, they consider that Strategy Support Measure 9 should acknowledge the significant potential for windfarm development outwith the areas of search.

11. Examination of the constraints maps submitted in support of the strategic authority's

response indicates that the areas highlighted by SRG Estates fall within the 2-kilometre-wide buffers around settlements (as suggested in Scottish Planning Policy) and are therefore excluded from the broad areas of search. However, as the policy and Background Report 11 point out, that does not imply that other areas may not be considered on their particular merits. I am satisfied that use of the expression “broad areas of search” indicates that they are not exclusive. There is therefore no need to expand on Strategy Support Measure 9.

Reporter’s recommendations:

1. Add the following after the second sentence of paragraph 4.63:

“Diagram 16 has been derived by mapping significant constraints, namely: international and national designations; windfarms of 20MW or over which are existing, consented or at planning application stage; green belt; 2-kilometre-wide buffers around settlements; and Regional Scenic Areas.”

Modify the following sentence to read (in part):

“It illustrates the areas of search ...”

2. Add the following at the end of paragraph 4.63:

“In their refinement of this strategy, local authorities are required, among other things, to distinguish those areas outwith the broad areas of search which require significant protection from those with potential constraints.”

Issue 17	Effectiveness and Additional Housing Land	
Development plan reference:	Section 4 Spatial Development Strategy Sustainable Framework 3 Sustainable communities	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E6 Quarriers E8 Taylor Wimpey UK Ltd E9 Wallace Land E10 CALA Homes/ Taylor Wimpey UK Ltd E12 Cemex UK Ltd. E14/1 Land Synergy E15/1 Bellisle Developments Ltd E18 Wm. Short esq E19 Duchal Estate E20 H. J. Paterson E23 Scottish Property Federation E24 Banks Group E29/2 Ogilvie Homes Ltd E30 NHS Greater Glasgow & Clyde E31 Caledonian Properties E34 James Barr Ltd</p>	<p>E35 Messrs Keith & John Lawrence E42/2 Lynch Homes E42/4 Lynch Homes E45/2 CALA Homes (West) E45/4 CALA Homes (West) E46/1 Susan Barnes (Landowner) E46/2 Susan Barnes (Landowner) E46/4 Susan Barnes (Landowner) E49/5 Jackton & Thorntonhall Community Council E50 Hometown Foundation E51/1 Scottish Government (Directorate for the Built Environment) E52/13 Mactaggart and Mickel (Homes) Ltd. E53/1 SRG Estates E55/4 Homes for Scotland</p>	
Provision of the development plan to which the issue relates:	Schedules 6 (page 43), 7 (page 43), 8 (page 44) and 9 (page 45) Paragraphs 4.65 (page 40) - 4.86 (page 49)	
Planning authority's summary of the representation(s):		
<p>This issue relates to representations which question the effectiveness of the housing land supply and/or request the provision of additional land for housing. The issue is articulated in various ways by different respondents.</p> <p>Relevant individual representations are summarised:</p> <p>E6 Quarriers This representation is concerned that there are no options for the delivery of new land for private housing outside the context of brownfield regeneration opportunities. It raises five main points:</p> <ul style="list-style-type: none"> • no apparent comprehensive assessment of the deliverability of existing supply; • a singular reliance on brownfield development; • theoretical oversupply of market housing; • backlog in affordable housing provision; • need to deliver land for affordable housing and the role that private housing plays enabling that development. <p>E8 Taylor Wimpey UK Ltd. This representation considers that there is an urgent need to address the issue of effectiveness of housing land supply including:</p> <ul style="list-style-type: none"> • questioning the lack of progress on Community Growth Areas to 2025; 		

- non-effective nature of sites within the land supply;
- non-effective nature and market conditions within Clyde Gateway;
- use of last 5 years completion sites as a proxy for the next 15 years; and
- urgent need for affordable and intermediate housing either provided by, or cross-subsidised by, the private sector;
- The representation also objects to the non identification in the conurbation of any additional housing land to 2025.

E9 Wallace Land

This representation is concerned that the Proposed Plan establishes a position that there is no need for any new strategic land releases; that there is continued reliance on the Urban Capacity Study; and that the strategy that flows from this position does not serve to deliver 'a generous supply of land for housing' or 'give the flexibility necessary for the continued delivery of new housing' as required by Scottish Planning Policy.

E10 CALA Homes/Taylor Wimpey UK Ltd

This representation has similar concerns to Wallace Land (E9). It also highlights ongoing delay in delivery of residential units at some Community Growth Areas such as South Wishaw and Larkhall/Ferniegair.

E12 Cemex UK Ltd.

The Proposed Plan's reliance on sites identified in the 2009 Housing Land Audit and 2009 Urban Capacity Study over-estimates the amount of effective housing land and its deliverability. The 2009 Housing Land Audit was based on pre-recession data and whilst account has been taken of the changed economic climate, the 'effectiveness' of a number of sites must be called into question.

Community Growth Areas are included in Housing Land Audits and these large-scale residential led developments have been difficult to deliver. The potential future supply identified in the Urban Capacity Study faces even greater uncertainty – a number of sites carry inherent risks in deliverability and raise issues such as ownership, contamination and physical constraints as identified in Planning Advice Note 2/2010.

The representation also refers to the response by Homes for Scotland to the Main Issues Report consultation, which assessed the effective land supply and concluded that there was a significant shortfall in supply.

The representation raises "serious concerns therefore with the methodology and assumptions upon which the Housing Need and Demand Assessment and Spatial Development Strategy is based. Within the context of continued uncertainty in the housing market and conflicting conclusions about projected housing completions, it is suggested that reference to surplus of housing land to meet private sector demand be removed from the Plan."

E14/1 Land Synergy, E15/1 Bellisle Developments

These representations consider that it is likely that the effectiveness of the housing land supply has been significantly overestimated by the Strategic Development Planning Authority and a great many sites previously considered to be effective are no longer financially viable. The following main points are raised:

- If there is an abundant effective supply then the current backlog of need would not be so great.
- The Urban Capacity Study reconsidered all non- and part-effective sites identified in the Housing Land Audit therefore creating an overlap between the supply set in

each.

- The Urban Capacity Study has not subjected each site to the tests of effectiveness as set out in Planning Advice Note 2/2010.
- While a commitment to bring forward sites already allocated/identified in existing local plans is accepted, these should be supplemented by a range of new sites that have the potential to deliver quickly as and when required, in the event that the committed sites fail to deliver on schedule or in the event that some of the committed sites do deliver and demand has increased following the easing of lending restrictions. This would ensure a flexible and robust housing land supply that can adapt as circumstances change, as required by Scottish Planning Policy.
- While the Strategic Development Plan proposes a degree of flexibility to bring forward additional sites as and when they are required, this may not be sufficient and the identification of additional clean and genuinely effective sites from the outset would far more likely result in the delivery of sufficient housing.

E18 Wm. Short esq., E19 Duchal Estate, E20 H. J. Paterson, E34 James Barr Ltd, E35 Messrs Keith & John Lawrence

These representations consider that the Proposed Plan does not take account of the current difficulties in delivering the established housing land supply and considers that the Strategic Development Plan's housing targets are unlikely to be met unless this issue is addressed at the strategic level. The representations refer to comments in the Chief Planner's letter (October 2010) and consider that these comments have not been reflected in the Proposed Plan. The Plan should:

- include additional housing land release, revisiting Schedules 8 & 9 to reflect this;
- introduce flexibility for future housing land allocations;
- acknowledge the delays facing the deliverability of Community Growth Areas;
- specify the vital role that smaller, more deliverable sites could play in meeting housing needs early in the plan period.

E23 Scottish Property Federation

Broadly supports the aspirations for growth, "however there is concern amongst members that the aspiration for growth is not supported by the housing allocations and some members advise that there is an undersupply of housing to 2025. For example, in the current climate only the sites that are viable with little risk will be developed, leaving many of the strategic sites, which the Glasgow and the Clyde Valley Strategic Development Planning Authority is relying on to come forward, as undevelopable. There is concern that the Community Growth Areas are ineffective and identifying them for development in the short-medium term will artificially inflate housing supply. We would suggest that the Local Development Plans be encouraged to bring forward smaller effective sites to make up for the larger constrained sites. We support Homes for Scotland on their views on this issue."

E24 Banks Group

The following main points are raised:

- The Plan does not reflect the Chief Planner's letter (29th October 2010) which requested that planning authorities review the effectiveness of their current housing land supply and that they should consider bringing forward more effective opportunities.
- Development of brownfield sites has become less feasible in the current financial climate due to remediation costs and funding difficulties often associated with such sites. Many of these sites, including sites in the existing established housing land supply and indeed within the effective supply, are unlikely to be effective in the current financial climate. This potential constraint to the development of such sites

should be recognised in the Strategic Development Plan.

- 6,000 house completions per annum is not regarded as ambitious.
- Circular 2/2010 (Planning Advice Note 2/2010) makes it clear in paragraph 62 that windfall sites cannot be regarded as part of the planned housing requirement and can only be considered effective once planning applications are approved.
- The use of an Urban Capacity Study which continues to contain sites which cannot be revealed to the public in the Background Report is highly unsatisfactory.
- There is no evidence of a more generous housing land supply; much more flexibility should be given to Local Development Plans to deal with this.
- Consideration needs to be given to the release of additional land in more effective locations to accommodate the short term impact of the current economic recession achieved through a combination of medium sized sustainable locations and by a more liberal approach to small scale locations of under 50 houses which are not classed as major development.
- The respondent does not see any reason why substantial progress cannot be made within the next 2 years on the Gartcosh/Glenboig Community Growth Area, where the respondent has an interest.

E29/2 Ogilvie Homes Ltd

The following main points are raised relating to additional land release:

- Serious concerns over the failure to identify any additional strategic land releases for private sector housing in the period up to 2025.
- Shares the concerns raised by Homes for Scotland that the Glasgow and the Clyde Valley Strategic Development Planning Authority takes an overly pessimistic view of Housing Need and Demand and an overly optimistic view of existing effective housing land.
- Approach is contrary to Scottish Planning Policy and National Planning Framework for Scotland 2 and the Government's specific objective to provide a 'generous' supply of effective housing land (giving flexibility) to meet identified housing requirements across all tenures and the need to maintain a 5 year effective supply of housing at all times.
- "We would suggest that there is a need for a proper and realistic reappraisal of the likelihood of resolving constraints on existing strategic allocations, as well as the need to identify additional effective housing land throughout the Glasgow and the Clyde Valley Strategic Development Plan area. The proposal to identify no new strategic housing land allocations in the period to 2025 must be reconsidered. The release of further effective housing land in marketable, accessible, sustainable and viable locations is therefore required and these must be capable of delivery throughout the plan period."

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties

(In response to paragraph 4.71) There are a number of National Health Service properties that will become surplus to requirements during the period of the Proposed Plan, and it is considered that these will contribute to the city-region's economic growth and quality of life. It is also considered that triggers should be identified for the release of future phases of effective sites where a 5 year effective supply is not being maintained. Additional land should be identified for housing above and beyond that identified over the plan period. By identifying additional land then it would maintain flexibility in the land supply.

E31 Caledonian Properties

States that it is inevitable that some larger and more complicated sites such as the

Community Growth Areas are likely to be unviable or difficult to fund during the plan period. It is our opinion that additional sites should be allocated to compensate against this and ensure that flexibility is retained moving forward. It is considered that there is reliance by the Glasgow and the Clyde Valley Glasgow Strategic Development Planning Authority on these sites and there should be a strategy in place to ensure that if these sites are not delivered then a mechanism is in place to allow for other sites to be brought forward.

E42/2 Lynch Homes, E45/2 CALA Homes (West)

These representations consider that the Proposed Plan does not make clear the assumption that all of the sites in the land supply in the Urban Capacity Study (over 100,000 homes) are assumed to be effective over the plan period. No evidence has been provided by the Glasgow and the Clyde Valley Strategic Development Planning Authority to confirm effectiveness and as such, the conclusion reached that no further land supply is needed for private housing is fundamentally flawed as well as contrary to the requirements in Scottish Planning Policy.

These representations also consider that the Proposed Plan should discount the Urban Capacity Assessment as part of the effective land supply to meet the strategic housing requirement and seek its allocation as part of the effective land supply.

E42/4 Lynch Homes, E45/4 CALA Homes (West)

These representations raise the following main points:

- There has been a lack of proper assessment of the future effective housing land supply across the region leading to the conclusion that no further housing land supply should be released over the period to 2025.
- The Spatial Development Strategy is founded on the premise that the sites identified in the Urban Capacity Study can become effective over the plan period, 100,000 units, which they consider not to be tenable because Urban Capacity Study sites have not been tested as being effective and these sites have not been agreed by the private housebuilders as capable of being developed. The Urban Capacity Study needs to prove that its potential land supply can be effective, which is best done by Local Authorities allocating all effective Urban Capacity Study sites in Local Development Plans in accordance with Planning Advice Note 2/2010.
- The Plan does not accord with Scottish Planning Policy Paragraph 72 which sets out the information requirements to be reported in the Proposed Plan. It is considered that Schedules 6 – 9 do not accord with the requirements of Scottish Planning Policy, methodology in Planning Advice Note 2/2010 and the Housing Need and Demand Assessment Guidance. The representations propose a replacement Schedule 6, deletion of Schedules 7 – 9, and a replacement schedule 7. These proposed changes would: remove the tenuring of the land requirements; use a draft 2010 Housing Land Audit as the base; and exclude all capacity identified in the Urban Capacity Study because it has not been assessed against Planning Advice Note 2/2010.
- A replacement Schedule 6 is proposed that does not differentiate land requirements by tenure; is derived from a draft 2010 Housing Land Audit; uses different time periods to those in the Housing Need and Demand Assessment; and presents all tenure annual requirement. It also provides annualised housing requirements which can be used to provide estimates of housing growth over the longer term period to 2033 (20 year) required by Scottish Planning Policy, which is omitted from the Proposed Plan. It provides an estimate of strategic housing requirements for the region and its constituent authorities – this key target is not included in the Plan.

- The replacement Schedule 7 proposed identifies annual shortfalls and scale of housing allocations necessary to Year 7 for all tenures by Local authority, which is omitted from the Proposed Plan.

E46/1 Susan Barnes (Landowner)

Sufficient scope should be provided for local planning authorities to allocate local-scale development to locations outwith the defined core areas. The majority of the Community Growth Areas remain undeveloped since their identification in the 2006 Structure Plan and therefore will form a significant contribution to the housing land requirement over the Strategic Development Plan period. The general location of the core strategic growth areas (Community Growth Areas) is not disputed; however, progress has been and will continue (over the next 5 years) to be slow, therefore the scope for local flexibility and additional sites should be clarified within the Proposed Plan to ensure a clear and transparent framework for the planning system in the West of Scotland. The scope for local-scale housing development proposals to 'support the local centre' is accepted in the Strategic Development Plan ('Diagram 4') but an additional sentence should be added to clarify that local-scale development can provide flexibility and a deliverable supply of land, whether for private or affordable housing, on the basis that it is well located in relation to the centre.

E46/2 Susan Barnes (Landowner)

The importance of the identified Community Growth Areas is not disputed but given the on-going delays and implementation issues associated with these large-scale development areas, clarification should be given to ensure that there remains scope for localised development. The representation considers that the Proposed Plan should acknowledge the role for suitably-scaled development (predominantly housing or mixed-use) in supporting and providing sufficient space to grow for local communities.

E46/4 Susan Barnes (Landowner)

The Proposed Plan makes no additional strategic housing allocations due to the focus on delivery of the Community Growth Areas; however deliverability of these areas will remain a critical issue. Local Authorities should be given clearer guidance to ensure housing land supply is maintained and they have scope to allocate land outwith these areas as necessary.

E49/5 Jackton & Thorntonhall Community Council

Consider that a generous supply of housing land has been identified in the Proposed Plan therefore there can be no benefit to housebuilders or any other party in identifying even more supply. The problems currently facing the house building industry do not stem from a lack of developable land but from a lack of demand. Increasing land supply would be more likely to exacerbate this situation since it would tend to drive down the market value of the existing land bank thereby threatening the financial stability of the sector.

E50 Hometown Foundation

Potential for not satisfying housing land requirements should be recognised, especially Community Growth Areas at Carluke & Larkhall, so that alternatives can be considered. It is considered that a review of the effectiveness of some sites is undertaken. It is not accepted that there is no strategic requirement to 2025 for additional land.

E51/1 Scottish Government (Directorate for the Built Environment)

Note that Table 7 (Schedule 6 our correction as no Table 7 in Proposed Plan) anticipates 108,000 planned private sector completions 2009-25. From earlier discussions we have

gathered that this figure assumes the entirety of the established supply will become available for development within the plan period, but it is not clear from the plan or supporting documents we have seen. We recommend that the reporter clarifies this point and satisfies themselves that this figure is based upon a realistic assessment of the likely deliverability of sites that may be in the established supply, but are not currently effective.

E52/13 Mactaggart and Mickel (Homes) Ltd.

The following main points are raised:

- The private sector requirement remains too cautious and does not follow government guidance in seeking to provide a generous housing land supply.
- A significant number of Community Growth Areas are currently not effective and will remain so for the foreseeable future.
- Shorter term completions are required by smaller settlement extensions that are not dependent upon key infrastructure investment.
- Further effective housing land is required to be planned for in terms of supply to meet short to medium term demand over the initial first seven year period from 2008-15. Local Development Plans should be allowed to select growth options that reflect local circumstances.
- Significant reliance on the Urban Capacity Study as detailed in paragraph 4.75, whilst indicating a significant number of units can come forward, at present many of these sites are constrained and are not effective.

E53/1 SRG Estates

The following main points are raised:

- Additional land (especially outwith Community Growth Areas) must be allocated to encourage development in a depressed market.
- Large scale sites are inherently fraught with deliverability difficulties. The current economic climate, which has resulted in a well-documented downturn in housing completions, has simply exacerbated the problems faced by such sites in the short to medium term.
- Where allocations cannot be deemed effective in the short term, it is vital that supplementary alternative proposals/strategies are identified at a strategic level in order to avoid resultant unmet demand.

E55/4 Homes for Scotland

The following main points are raised:

- Has no objection to the demographic and economic projections which form the basis of the Plan, or to the assessment of demand and need contained in the Housing Need and Demand Assessment.
- Does not seek changes to the numerical basis of the housing policies. It does seek a different presentation of the requirements and supply to ensure that local planning authorities genuinely have the flexibility and discretion, as implied by Part 1 of the Plan, to identify effective housing land to meet needs and demands across all tenures.
- Does not fully agree with paragraph 4.71 – while higher population projections than those provided by GROS (General Register Office for Scotland – now part of National Records of Scotland) are elements of flexibility, backlog need and discounting windfall sites are not.
 - Housing Need and Demand Assessment Guidance is clear that backlog need is part of the core projection of need and therefore cannot be considered flexibility.
 - Planning Advice Note 2/2010 states in paragraph 62 that windfall sites are

not part of the planned housing supply, should not be counted towards meeting the housing requirement, and are only effective once planning consent is granted. The implication is that the Plan expects effective housing land supplies to be augmented in practice by windfall; however, this does not conform to the requirement in Scottish Planning Policy that there is a 'generous' land supply actually allocated in the development plan.

- It would be helpful to know how much additional flexibility the Glasgow and the Clyde Valley Strategic Development Planning Authority actually believes is built into the Housing Need and Demand Assessment projections, as this information is not quantified anywhere. Our position is that the Housing Need and Demand Assessment projections are a starting point, onto which additional flexibility is built by the provision of a generous allocated land supply.
- Disputes the assumption made about available land supply, in particular the Plan's assertion that it already knows where all necessary housing land can be found for the next 20 years.
- Acknowledges that 2009 Housing Land Audits were prepared to reflect the economic circumstances and were audited by Homes for Scotland; and that 2009 Urban Capacity Study is an established methodology that includes all the established but not yet effective sites from the audits, as well as an assessment of potential from other sources. However, rejects the assertion in the Proposed Plan that the Urban Capacity Study is a sound basis for saying there will be sufficient effective land to meet requirements for the next 20 years; it is the role of Local Planning Authorities to validate future effective supply beyond that agreed in Audits as effective for the next seven years.
- Considers that Homes for Scotland had no active part in preparing the Urban Capacity Study; the proportion of the established supply from the 2009 audits which is non-effective has risen from 48-62%; other sources of assumed capacity are not identified in detail and cannot therefore be verified; the Urban Capacity Study is an estimate of supply, it follows that these estimates have to be validated in order for their contribution to meeting needs to be proved; validation must involve applying the tests of Planning Advice Note 2/2010 to land proposed to be allocated in Local Development Plans (10 years effective supply from date of adoption).
- Assumed sufficiency at a Strategic Development Plan level in fact masks considerable variations by Council area.
- Document HFS2, submitted in support of the representation, sets out Local Authority requirements and supply – the close correspondence of figures questions if this represents 'generous' land supply.
- Document HFS3, submitted in support of the representation, makes reference to research by Turley Associates that typically some 25-30% of assumed housing land supplies never come to fruition (Holder, Robin and Pickles, Helen, Turley Associates (2008) "The Effectiveness of Housing Land Audits in Monitoring Housing Land Supply in Scotland". Edinburgh: The Scottish Government Social Research).
- Taking into account figures for affordable need it is difficult to understand why the need for additional land for affordable housing is not an issue on which the Strategic Development Plan gives guidance.
- Excessive emphasis on brownfield land and regeneration without sufficient regard to achieving a range and choice of housing types and residential locations.
- Document HFS1, submitted in support of the representation, sets out an analysis (based on the draft 2009 Housing Land Audits), of requirements and supply using an approach which is in conformity with Scottish Planning Policy.

- Homes for Scotland agrees with paragraph 4.86 that it is for local authorities to determine their respective housing supply targets and associated housing land requirements in their Local Housing Strategies and Local Development Plans.

The following representations indicate that they endorse and support the views of Homes for Scotland: E9 Wallace Land; E10 Cala Homes and Taylor Wimpey; E23 Scottish Property Federation; E29/2 Ogilvie Homes Ltd.

Modifications sought by those submitting representations:

E6 Quarriers

No specific modification sought in relation to effectiveness.
(Related aspects are dealt with in Issue 13 Green Belt).

E8 Taylor Wimpey UK Ltd.

There is an urgent need for this Plan to address the issue of effectiveness. Support is expressed for Paragraphs 4.87 and 4.89, which outline the circumstances for Local Authorities to release additional land. No specific modification sought.

E9 Wallace Land

No specific modification sought.

E10 CALA Homes/ Taylor Wimpey UK Ltd

No specific modification sought.

E12 Cemex UK Ltd.

A more flexible approach should be adopted in the forthcoming Plan, recognising the inherent uncertainties in the current housing market and the impact this has upon local authorities' ability to maintain an effective 5-year housing land supply. In particular we would suggest that reference to a surplus of effective and established land to meet private sector housing demand should be removed from the Plan to reflect the continued uncertainty in the deliverability of the established land supply during the Plan period.

E14/1 Land Synergy, E15/1 Bellisle Developments Ltd

The Strategic Development Plan should provide a generous supply of new effective sites from the outset of the plan period which will assist in the maintenance of a continuous effective supply of housing land and the realisation of the spatial development strategy.
(Related aspects are dealt with in Issue 20 Generous Land Supply).

E18 Wm. Short esq., E19 Duchal Estate, E20 H. J. Paterson

The Proposed Plan should take account of the current difficulties in delivering the established housing land supply. Schedules 8 and 9 in particular should be revised to include additional housing land release. The Plan should also be modified to introduce flexibility for future housing land allocations, acknowledge the delays facing Community Growth Areas as well as specifying the vital role that smaller, more deliverable sites could play in meeting housing needs early in the plan period, while both public and private expenditure remains constrained.

E23 Scottish Property Federation

The Plan's aspiration for growth is not supported by the housing allocations and some members advise that there is an undersupply of housing to 2025. There is concern that the Community Growth Areas are ineffective and identifying them for development in the

short–medium term will artificially inflate housing supply. Local Development Plans should be encouraged to bring forward smaller effective sites to make up for the larger constrained sites.

E24 Banks Group

Many brownfield sites are unlikely to be effective in the current financial climate. This potential constraint to the development of such sites should be recognised in the Strategic Development Plan. Consideration needs to be given to the release of additional land in more effective locations to accommodate the short term impact of the current economic recession. This should be achieved through a combination of medium sized sustainable locations and by a more liberal approach to small scale locations of under 50 houses which are not classified as major development. Local Development Plans should be given more flexibility to provide a generous housing land supply.

(Related aspects are dealt with in Issue 20 Generous Land Supply).

E29/2 Ogilvie Homes Ltd

- We would suggest that there is a need for a proper and realistic reappraisal of the likelihood of resolving constraints on existing strategic allocations, as well as the need to identify additional effective housing land throughout the Strategic Development Plan area.
- The proposal to identify no new strategic housing land allocations in the period to 2025 must be reconsidered. The release of further effective housing land in marketable, accessible, sustainable and viable locations is therefore required and these must be capable of delivery throughout the plan period.

(Related aspects are dealt with in Issue 20 Generous Land Supply and Issue 24 Housing Land Additions: Specific Locations).

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties

The Glasgow and the Clyde Valley Strategic Development Planning Authority should identify additional land for housing above and beyond that identified over the plan period. By identifying additional land it would maintain flexibility in the land supply.

(Related aspects are dealt with in Issue 20 Generous Land Supply and Issue 27 Strategy Support Measure 10 Housing and Local Flexibility).

E34 James Barr Ltd, E35 Messrs Keith & John Lawrence

Include additional housing land release and amend Schedules 8 and 9 and related text accordingly. Further flexibility required in relation to housing land allocations i.e. a requirement for further private sector housing land release is required.

(Related aspects are dealt with in Issue 20 Generous Land Supply).

E42/2 Lynch Homes, E45/2 CALA Homes (West)

- Discount the Urban Capacity Study as part of the effective land supply to meet the strategic housing requirement and seek its allocation as part of the effective land supply.
- Paragraph 4.71 delete existing text and replace with the following:

“The overall strategic housing requirement for all tenures is shown in Schedule 6. Local Development Plans are expected to allocate sufficient land to meet these requirements and to maintain a 5 year land supply at all times. Councils will undertake appropriate assessments to ensure that all sites to be allocated are effective in accord with Scottish Government guidance and to assess the level of completions expected from these allocations and effective land supply to ensure that the 5 year land supply is maintained at all times. Councils have undertaken an Urban Capacity Study. Any sites which are effective should be allocated in the Local Development Plans. This will provide a valuable source of brownfield land in accord with the strategy. These approaches will ensure flexibility in the Strategic Development Strategy.”

(Related aspects are dealt with in Issue 20 Generous Land Supply).

E42/4 Lynch Homes, E45/4 CALA Homes (West)

These representations propose the following modifications:

- 4.70 delete from the first sentence “..the private sector”
- 4.71 (duplicate modification to E42/2 & E45/2 above)
- 4.72 delete from the second sentence “Considerable...” and replace with “However, it needs to recognise that limited...”
- 4.72 add at the end of the paragraph:
 “As required by Scottish Planning Policy, Schedule 7 details the scale of land release to be allocated in the Local Development Plans to Year 7. Local Development Plans are advised to adopt the annualised estimate of the strategic housing requirement to assess the housing shortfalls and allocations needed over the 10 year plan period.
 “Local Development Plans should through the Local Housing Strategy adopt the findings from the Housing Need and Demand Assessment to assess Local Housing Needs and any affordable housing shortfall. If a shortfall is identified then and affordable housing policy is appropriate.
 “Local Development Plans can allocate land for affordable homes to help deliver the Strategic Development Strategy.”
- 4.77 delete paragraph and replace with “Having determined the strategic housing requirement for each local authority area, Schedule 7 (amended) details the scale of housing allocations to be met by site allocations to year 7 as required by Scottish Planning Policy. This is based on the effective land supply in the latest Housing Land Audit (2010). Windfall sites are not included in this land supply assessment. The land identified in the Urban Capacity Study has not been agreed effective and therefore cannot be included in this land supply. Land which is part of the Urban Capacity Study can be allocated in the Local Development Plans it can be demonstrated that these are effective in the relevant plan period.”
- Delete Schedules 7, 8 and 9 and replace with new Schedule 7 before paragraph 4.77.

Schedule 7: Housing Shortfalls to Year 7

Local Authority	Housing Shortfalls to Year 7		
	Annualised Housing Requirement to Year 7 (i)	Effective Housing Supply (ii)	Housing Shortfall
East Dunbartonshire	4,065	1,110	2,955
East Renfrewshire	2,129	1,329	800
Glasgow City	36,700	18,024	18,676
Inverclyde	1,905	2,171	0
North Lanarkshire	9,376	6,515	2,861
Renfrewshire	4,868	4,311	557
South Lanarkshire	12,559	9,728	2,831
West Dunbartonshire	1,739	1,968	0
GCV total	73,340	45,156	28,679

**Source: (i) Strategic Housing Requirement (Schedule 6)
(ii) Assessed from 2010 Housing Land Audits as approved (2009 HLA for East Dunbartonshire)**

Replace Schedule 6 with revised Schedule 6 (this revised Schedule 6 is also referred to in E42/2 above).

Schedule 6 (amended): Housing Requirements

Local Authority	Housing Requirement to Meet Housing Need & Market Demand						
	7 Year 2013-20			12 Year 2013-2025			Annual Requirement
	Market	Affordable	Total	Market	Affordable	Total	
East Dunbartonshire	1,718	3,650	5,368	2,118	4,850	6,968	581
East Renfrewshire	1,400	1,750	3,150	1,700	1,950	3,650	304
Glasgow City	16,164	26,850	43,014	26,164	36,750	62,914	5,243
Inverclyde	891	2,175	3,066	991	2,275	3,266	272
North Lanarkshire	9,673	0	9,673	16,073	0	16,073	1,339
Renfrewshire	5,282	363	5,644	7,982	363	8,344	695
South Lanarkshire	10,055	7,675	17,730	12,555	8,975	21,530	1,794
West Dunbartonshire	1,782	0	1,782	2,982	0	2,982	248
GCV total	46,964	42,463	89,426	70,564	55,163	125,726	10,477

Note: Based on Planning Scenario/High Affordability including lower estimate of Backlog of Need

(Related aspects are dealt with in Issue 22 All Tenure Housing Requirement).

E46/1 Susan Barnes (Landowner)

Page 6, Diagram 4 ‘Supply-side: Sustainable Location Assessment’, ‘Network of Centres’ add sentence: “Providing local-scale development opportunities that are, or can be, sustainably linked with existing local centres.”

E46/2 Susan Barnes (Landowner)

Add sentence at end of paragraph 4.15: “It is recognised that Community Growth Areas will require to be augmented by local-scale development at local centres, proposals for which should be considered by local planning authorities on their planning merits”.

E46/4 Susan Barnes (Landowner)

Add sentence, prior to last sentence of paragraph 4.75, page 42: "...subject to local planning authorities augmenting supply when necessary with suitably scaled allocations at local centres."

E49/5 Jackton & Thorntonhall Community Council

No specific modification sought.

(Related aspects are dealt with in Issue 27 Strategy Support Measure 10 Housing and Local Flexibility).

E50 Hometown Foundation

- The plan should recognise the potential for such development (Owenstown) as part of the development strategy in bringing forward alternatives to the established Community Growth Areas or allocated sites if some of these are not effective or delayed in delivery. In particular, the Community Growth Areas identified at Carluke and Larkhall have been slow to come forward and the potential for not satisfying housing land requirements should be recognised by the plan so that alternatives can be considered. The phased development of a new settlement could deliver this requirement should existing identified locations not be effective.
- In order to maintain choice and encourage new investment and growth the lack of any strategic requirement to 2025 for additional land to be identified is not accepted.

(Related aspects are dealt with in Issue 23 Definitions of Intermediate Housing and Affordable Housing)

E51/1 Scottish Government (Directorate for the Built Environment)

- We suggest that the Reporter invites the Glasgow and the Clyde Valley Strategic Development Planning Authority to revisit its housing requirement to 2025 to take account of all tenures. In doing so the outputs of the Housing Need and Demand Assessment should be the starting point, but other factors including realistic prospects for the housebuilding industry, for growth, and for the availability of public subsidy to support affordable housing may also be taken into account. The Glasgow and the Clyde Valley Strategic Development Planning Authority should then be invited to identify a housing land requirement more than sufficient to accommodate this target (i.e. incorporating a generosity allowance), and taking account of a realistic assessment of the proportion of the established supply likely to become effective by 2025.
- If the Reporter concludes from this exercise that the Proposed Plan does not deliver a generous supply of housing land, then we suggest that Schedule 9 of the Plan is reworked to identify the shortfall in each sub-market area (and including a distribution of mobile demand) and a requirement included in the Plan for the eight planning authorities to allocate land to meet these shortfalls through their Local Development Plans.

(Related aspects are dealt with in Issue 19 Housing Market Areas, Issue 20 Generous Land Supply and Issue 22 All Tenure Housing Requirement)

E52/13 Mactaggart and Mickel (Homes) Ltd.

- Requests a strategic plan that is consistent with government planning policy.
- Provide for allocations throughout each council area to ensure that effective housing opportunities are realised and that a generous housing land supply is maintained at all times throughout the plan area and over the plan period.

(Related aspects are dealt with in Issue 20 Generous Land Supply)

E53/1 SRG Estates

Where allocations such as the defined Community Growth Areas cannot be deemed effective in the short term, supplementary proposals/strategies should be identified at the strategic level. This would allow for sustainable housing development to come forward outwith the Community Growth Areas and placate housing need and demand in the short term.

E55/4 Homes for Scotland

- Paragraph 4.72 second sentence delete “considerable” and replace with “some”. Add a final sentence: “Mixed sustainable communities also depend on a variety of locations and types of land being identified, including a mix of brownfield and greenfield.”
- Paragraph 4.75 delete third sentence and replace with: “These sources of supply represent the locations which Local Authorities should consider first when identifying land through the Local Development Plan. Local Development Plans must allocate a generous supply of land to meet requirements which is effective or capable of becoming effective, and should ensure through monitoring the maintenance of a minimum 5-year effective housing land supply at all times.”
- Paragraph 4.78 delete first sentence and replace with: “The projections of need are higher in the earlier period because the Housing Need and Demand Assessment has identified backlog need.”
- Paragraph 4.84 delete first two sentences and replace with: “The intermediate sector potentially is part of the wider approach to meeting affordable housing needs. Local Authorities will assess the overall scale of housing land required to meet all needs, but should note that some households who can access intermediate housing may be more mobile than those in the social-rented sector. Some flexibility in land allocations may be needed to reflect this.”

(Related aspects are dealt with in Issue 20 Generous Land Supply, and Issue 22 All Tenure Housing Requirement)

Summary of responses (including reasons) by planning authority:**General**

These representations question some aspects of the effectiveness of the housing land supply and consequently seek additional housing land release to meet the economic and household forecasts and projections underpinning the Proposed Plan.

In addressing the issue of effectiveness, the Glasgow and the Clyde Valley Strategic Development Planning Authority is satisfied with the accuracy of its assessment of the effectiveness of the housing land supply, and maintains its view that there is not a need for additional strategic land releases for private sector housing. The Proposed Plan concludes that there is a surplus of housing land already identified through the Housing Land Audit and Urban Capacity Study to 2025.

This is challenged by the representations, based on arguments relating to

- Over-optimistic assessment of ‘effectiveness’
- Over-reliance on Community Growth Areas, although most representations accept the role of the Community Growth Areas in the longer term.

It should be noted that although the effectiveness of the land supply is questioned, most representations accept the assessment of future demand.

Core arguments in the representations

The representations argue that

- Current market circumstances undermine effectiveness and that there is a requirement for additional flexibility
- A more realistic assessment of effectiveness would result in recognition of a requirement for additional strategic housing land release.
- There appears to be an underlying presumption that such additional strategic land release automatically would stimulate additional housing supply and contribute to resolving unmet demand.

Approach to answering the representations

The Authority's response considers these as two sub-issues –

1. Effectiveness
2. Additional Land for Housing.

Effectiveness is examined in relation to three components: Housing Land Audit; Urban Capacity Study and Community Growth Areas.

Finally, the response addresses the specific modifications proposed.

It is important to note that many of the housing issues are inter-related and other aspects of the responses will be dealt with more fully in other Schedule 4's, notably Issues 17 – 27. The relationship between the housing issues is detailed in the paper 'Housing Land - A Strategic Overview'.

At the outset, it is also important to recognise that the Housing Need and Demand Assessment, the method to calculate housing requirements, is a new methodology. In the Glasgow and the Clyde Valley area, its Housing Need and Demand Assessment has been declared 'robust and credible' in a letter from the Scottish Government's Centre for Housing Market Analysis in June 2011 (Supporting Document 1). The Scottish Government's Housing Need and Demand Assessment Guidance (March 2008) (Supporting Document 2, Page 7) explains that where a Housing Need and Demand Assessment is 'robust and credible' its approach will not be considered at examination. Instead the examination will focus on the proposed spatial policies for housing set out in the Proposed Plan and their relationship with the findings of the housing need and demand assessment.

Sub-issue1: Effectiveness

E6 Quarriers; E8 Taylor Wimpey UK Ltd; E12 Cemex UK Ltd.; E14/1 Land Synergy; E15/1 Bellisle Developments Ltd; E18 Wm. Short esq.; E19 Duchal Estate; E20 H. J. Paterson; E23 Scottish Property Federation; E24 Banks Group; E29/2 Ogilvie Homes Ltd; E30 NHS Greater Glasgow & Clyde; E31 Caledonian Properties; E34 James Barr Ltd; E35 Messrs Keith & John Lawrence; E42/2 Lynch Homes; E42/4 Lynch Homes; E45/2 CALA Homes (West); E45/4 CALA Homes (West); E49/5 Jackton & Thorntonhall Community Council; E50 Hometown Foundation; E51/1 Scottish Government (Directorate for the Built Environment); E52/13 Mactaggart and Mickel (Homes) Ltd.; E53/1 SRG Estates; E55/4 Homes for Scotland

The majority of representations challenge the effectiveness of the housing land supply through the Housing Land Audit, Urban Capacity Study and/or the Community Growth Areas.

Effectiveness – Basic Position within the Proposed Plan

- The Authority's position is for a private sector requirement for 97,000 new housing completions by 2025. The Plan has identified land available for 108,000 units,

averaging 6,000 completions annually.

- This figure exceeds the projected demand by a surplus of 11,000 units.
- Therefore, there is more than sufficient land available to fulfil demand in the city-region to 2025. The housing land supply used in the Proposed Plan is based on the 2009 Housing Land Audit and the 2009 Urban Capacity Study, which includes the Community Growth Areas identified in the 2006 Structure Plan.

Effectiveness – Meeting the Definition in the Proposed Plan

- ‘Effective housing land supply’ is defined in Scottish Planning Policy, Glossary (Supporting Document 3), as “The part of the established housing land supply which is free or expected to be free of development constraints in the period under consideration, and will therefore be available for the construction of housing.”
- In the city-region, the Housing Land Audit considers effectiveness for seven years, to allow two years for adoption of the strategic development plan, whilst providing a five year effective land supply for local development plans, consistent with Scottish Planning Policy, Paragraph 72 (Supporting Document 3).
- Furthermore, Planning Advice Note 2/2010, Paragraph 55, clearly states “To assess a site or a portion of a site as being effective, it must be demonstrated that within the five-year period beyond the date of the audit the site can be developed for housing...” (Supporting Document 4). Paragraph 55 identifies seven criteria by which planning authorities can determine the effectiveness of individual sites in the Housing Land Audit. These are:
 - Ownership
 - Physical
 - Contamination
 - Deficit funding
 - Marketability
 - Infrastructure
 - Land use.
- The 2009 Housing Land Audit was undertaken based on these criteria and audited by Homes for Scotland. The resulting agreed position provided the basis for the Private Sector comparison of supply and demand in the Housing Need and Demand Assessment.
- Two of these criteria, Ownership and Marketability, are worthy of further consideration in current economic circumstances, and may relate to the representations questioning the effectiveness of the land supply.
- *Ownership*: “the site is in the ownership or control of a party which can be expected to develop it or release it for development. Where a site is in the ownership of a local authority or other public body, it should be included only where it is part of a programme of land disposal” - there is a strong commercial aspect to this factor which may affect some parts of existing landbanks - even if a site is in a developer’s ownership and has planning consent and has no abnormal physical/infrastructure constraints, it may not in fact be developed if the developer judges that it will not generate a satisfactory return.
- *Marketability*: “the site, or relevant part of it, can be developed in the period under consideration” - even if a site, under normal circumstances, could be developed in the period under consideration, nothing will happen if the developer judges market vitality to be so low and demand so sluggish that the risk of profitable sales is

unacceptable. In this instance alternative sites may not be any more effective than the example given and may not deliver completions any sooner. A key issue here is the level of current actual demand.

- ‘Established housing land supply’ is defined in Planning Advice Note 2/2010, Glossary, (Supporting Document 4) as “The total housing land supply – including both unconstrained and constrained sites. This will include the effective housing land supply, plus the remaining capacity for sites under construction, sites with planning consent, sites in adopted local development plans and where appropriate other buildings and land with agreed potential for housing development.”
- The Established Land Supply at 2009 has mostly been included in the Urban Capacity Study although some sites have been excluded due to the 2009 Urban Capacity study being predominantly based on the draft 2009 Housing Land Audits (ref Issue 21 Urban Capacity Study).

Housing Land Audit – Compliance with Scottish Government Guidance

- The annual Housing Land Audit is fully audited with Homes for Scotland.
- Housing Land Audits are an accepted means of monitoring land supply in Scottish Planning Policy (Supporting Document 3) and Planning Advice Note 2/2010 (Supporting Document 4).
- The 2009 Housing Land Audit provides seven years effective housing land to 2016, with most of the remaining established land supply being identified in the Urban Capacity Study.
- At the time of the preparation of the 2009 Housing Land Audit (base date 31st March 2009), the consolidated Scottish Planning Policy had not been published; therefore, the policy framework was provided by Scottish Planning Policy 3 ‘Planning for Homes’ (Revised 2008) (Supporting Document 5).
- Guidance on undertaking Housing Land Audits was found within Scottish Planning Policy 3 Planning for Homes, Annex A Housing Land Audits (Supporting Document 6), as Planning Advice Note 2/2010 had not been published.
- It should be noted that only limited change has occurred between Annex A of Scottish Planning Policy 3 and the Housing Land Audit section in Planning Advice Note 2/2010. References below will relate to Planning Advice Note 2/2010 and Scottish Planning Policy.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority considers its approach to assessing effectiveness is compliant with Scottish Planning Policy and Planning Advice Note 2/2010.
- The Housing Land Audit in the Glasgow and the Clyde Valley Strategic Development Plan area is undertaken by the constituent authorities using jointly agreed ‘Housing Land Audit Guidance Notes’ (Supporting Document 7) which are consistent with Government guidance and advice.

Housing Land Audit – Consistency and Process

- Liaison meetings throughout the year address problems arising in undertaking the audit and promote consistency in the approach between authorities. This consistency allows annual monitoring of the housing land supply in the city-region to be undertaken within the Housing Market Area framework which operates across local authority administrative boundaries.
- The 2009 Housing Land Audit was undertaken taking into account the changing

market circumstances arising from the economic downturn and the reduced capacity of the house building industry.

Housing Land Audit – Trends in the city-region

- Compared to 2008 figures, the 2009 Housing Land Audits revised effectiveness downwards between 5% and 30% (recognising varying circumstances between local authorities).
- The finalised Housing Land Audits were agreed with Homes for Scotland, with only a minor dispute of 4% (1,500 units) of the overall capacity (relating to three local authorities).
- Only 38% of the total land supply was considered effective in 2009 compared with 52% in 2008 and up to 60% in the preceding 4 years. During these discussions, Homes for Scotland recognised that the reduction in effective land supply would also be reflected in demand and capacity of the house building industry.
- The Urban Capacity Study equally was undertaken in the context of depressed market conditions, and authorities took a measured view of the rate of recovery in the housebuilding industry.

Effectiveness – Urban Capacity Study

- The Scottish Government encourages planning authorities to use Urban Capacity Studies to assess opportunities for further housing development within existing settlements, focusing on previously developed land and conversion of existing buildings, and reviewing land currently allocated for uses other than housing. Scottish Planning Policy, Paragraph 81 (Supporting Document 3).
- An Urban Capacity Study in the city-region is undertaken every five years to support the production of the Strategic Development Plan and a Housing Need and Demand Assessment. Some respondents have suggested that the Urban Capacity Study should be subject to the tests of effectiveness identified in Planning Advice Note 2/2010 for undertaking the Housing Land Audit.
- The criteria of effectiveness apply to the five year effective land supply in accordance with Scottish Planning Policy. Urban capacity sites cover a spectrum of current uses and may be subject to confidentiality in terms of their potential change of use and its timing. It is therefore not appropriate - nor is it the intention of the Scottish Government - to apply the criteria of effectiveness to sites identified in the Urban Capacity Study which focuses on housing development in the longer term, 2016-2033 (2016-25 are considered in the housing calculations in the Proposed Plan).
- The Urban Capacity Study has been undertaken consistently and realistically across the constituent authorities and the methodology was the subject of consultation prior to its commencement (Urban Capacity Study Issues Report 2009) (Supporting Document 8).
- The outcomes are detailed in the Urban Capacity Study 2009, Background Report 13 to the Proposed Plan (Supporting Document 9). The Glasgow and the Clyde Valley Strategic Development Planning Authority therefore rejects the view that the Urban Capacity Study should be subject to the criteria of effectiveness identified in Planning Advice Note 2/2010. Further related discussion may be found in Issue 21 Urban Capacity Study.
- Many representations highlight delivery issues because of market conditions. In this context it is worth noting that if the Housing Need and Demand Assessment

had focussed on the short term, then projected household growth would have been considerably less than the figures now presented in the Housing Need and Demand Assessment, which reflect longer term conditions. Further related discussion may be found in Issue 22 Generous Land Supply.

Effectiveness – Community Growth Areas

Requests to specifically remove Community Growth Areas are dealt with in Issue 18 - Removal of Community Growth Areas.

- Most representations support Community Growth Areas over the longer term, but question their short or medium term effectiveness, anticipating delayed delivery due to the current economic situation, and abnormal infrastructure or other costs.
- The Community Growth Areas set out in the 2006 Joint Structure Plan (approved by Scottish Ministers on 29th April 2008) with an estimated capacity of approximately 19,000 houses, are a fundamental component of the long term sustainable urban expansion of the city region and make a significant **greenfield** contribution to the land supply (approximately 20% of the Established Land Supply (of which 10% are effective).
- Community Growth Areas were selected to meet the development needs set out in the Glasgow and the Clyde Valley 2006 Structure Plan Technical Report TR6/06 Assessment of Potential Areas for Urban Expansion, April 2006 (Issue 5 Supporting Document 3). Their designation was also a response to the House-building Industry's then appeal for large-scale release in order 'to procure' infrastructure investment. Paragraph 28 of the aforementioned Report highlights the preference has been given to corridors with sustainable transport access, to corridors reflecting the sensitivities of Green Belt and their capacity for significant development of a long term approach creating or enhancing communities.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority recognises that, whilst few of the Community Growth Areas are currently under construction due to current economic conditions, they all have either been integrated into Local Plans, or have been the subject of master planning, or have been granted planning permission. They remain, therefore, a fundamental component of the land supply.
- The Proposed Plan therefore anticipates that Community Growth Areas will contribute substantially to supply in the medium and longer-terms. The **Banks Group (E24)** takes the view that Gartcosh/Glenboig Community Growth Area could see substantial progress within the short term. This difference of view regarding delivery of these growth areas reflects differing judgements within the Industry regarding how quickly stability and confidence will return to markets. Current circumstances in the housing market are unusual and give rise to considerable uncertainty. The land supply will continue to be annually monitored through Housing Land Audits.
- In resisting the numerous representations for substantial additional housing land release, based on the Community Growth Areas being considered largely non-effective in the short-term, the Strategic Development Planning Authority acknowledges that any new releases would require greenfield land. With market recovery, these new alternative housing sites, added to the existing Greenfield land supply, would establish a greenfield land-bank which could undermine the basis of regeneration strategies and community renewal through brownfield land recovery, including National Development Priorities and Community Growth Areas, and

diverting from strategy aimed at sustainable development models and low carbon futures.

- The Glasgow and the Clyde Valley Strategic Development Planning Authority is mindful of the need for a balanced judgement: sustainable economic growth includes enabling the provision of a range of housing to meet various requirements, but it also requires a high quality, enhanced environment where every effort is made to regenerate vacant and derelict land (National Planning Framework for Scotland 2, paragraphs 55, 72-77, 87 and 91) (Supporting Document 10). It is considered that bringing forward significant new sites in the short to medium term would be contrary to the Spatial Development Strategy and the overall vision of the Proposed Plan which has identified a surplus in private sector supply to 2025.

Sub-issue 2: Additional Land for Housing

E8 Taylor Wimpey UK Ltd; E9 Wallace Land; E10 CALA Homes/ Taylor Wimpey UK Ltd; E12 Cemex UK Ltd.; E14/1 Land Synergy; E15/1 Bellisle Developments Ltd; E18 Wm. Short esq.; E19 Duchal Estate; E20 H. J. Paterson; E23 Scottish Property Federation; E24 Banks Group; E29/2 Ogilvie Homes Ltd; E30 NHS Greater Glasgow & Clyde; E31 Caledonian Properties; E34 James Barr Ltd; E35 Messrs Keith & John Lawrence; E42/4 Lynch Homes; E45/4 CALA Homes (West); E49/5 Jackton & Thorntonhall Community Council; E50 Hometown Foundation; E53/1 SRG Estates

- In asserting the ineffectiveness of a proportion of the identified housing land supply, many representations go on to propose additional strategic land release for housing. In some cases this is a general request for additional release, in others specific sites are proposed; small scale releases are requested on what developers deem 'clean' sites that could be developed quickly (**E14/1 Land Synergy; E15/1 Bellisle Developments Ltd; E18 Wm. Short esq.; E19 Duchal Estate; E20 H. J. Paterson; and E23 Scottish Property Federation**); and one specifies release of sites under 50 units (**E24 Banks**). For site specific representations see related Issue 24 Housing Land Allocations Specific Locations.
- This position presumes that such additional strategic land release sites would be more effective than the existing sites identified in the housing land supply and would result in additional units being completed and occupied.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority disagrees with this position and considers that a generous supply of effective land for private sector housing has already been provided through the Housing Land Audit, which has been audited by Homes for Scotland, and through the Urban Capacity Study, comprising sites from the Established Land Supply and Community Growth Areas.
- Even using optimistic household projections, taking account of the in-built flexibility in the Plan, including the exclusion of windfall sites, and revising the housing land supply to reflect depressed economic conditions, a surplus of 11,000 units has been identified by 2025 in the private sector. The question of in-built generosity/flexibility in the underlying assumptions of the Proposed Plan is dealt with under Issue 20 Generous Land Supply.
- It is important to bear in mind that the provision of land for housing does not guarantee more housing completions. Scottish Planning Policy, Paragraph 76 (Supporting Document 3) recognises this: "The delivery of housing does not rely solely on the allocation of appropriate land in the development plan. A variety of other factors are important including the planning application and its determination,

negotiation of legal agreements, granting of a building warrant and roads construction consent, water and drainage connection, the capacity of the construction industry and the functioning of the housing market. Most of these factors are outwith the direct control of the planning authority”.

- The Glasgow and the Clyde Valley Strategic Development Planning Authority is satisfied that there is a generous housing land supply as required by Scottish Planning Policy.
- It is accepted that the economic downturn and fiscal restraint may affect deficit funding for more complex regeneration projects and some contributions to affordable provision. But the severity of the change in economic circumstances has been such that construction work on several otherwise attractive and marketable sites in the city-region has simply halted.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority views current market circumstances relating to substantially reduced demand, as a result of various factors including economic uncertainty, insecure labour market, low confidence and lack of mortgage finance, as the key issues. These are not planning issues. This point is supported in East Renfrewshire Council’s Local Plan Examination Report, September 2010, Issue 26, paragraph 28 (Supporting Document 11) where the Reporter concluded that “The main barrier to the uptake of the land supply and consequent delays in programming appear to focus on the capacity of the house-building industry, the current economic climate and the nature of the housing market. These matters are not directly within the control of land use planning.”
- Furthermore, **E49/5 Jackton & Thorntonhall Community Council** also refer to these issues in their representation considering that the problems currently facing the house building industry do not stem from a lack of developable land but from a lack of demand. They consider that increasing land supply would be more likely to exacerbate this situation since it would tend to drive down the market value of the existing land bank thereby threatening the financial stability of the sector.
- It is therefore not clear from the demands for additional strategic land release how a substantial number of different sites will overcome these issues and stimulate demand. This is explicitly recognised by the Chief Planner in his letter to Heads of Planning of 29 October 2010, relating to the provision of an effective supply of land for housing, Paragraph 6 (Supporting Document 12, our emphasis): “Where a planning authority has a 5 year supply of effective housing land but the impediment to developing that site is the general availability of mortgages or low level of demand from purchasers then there will be little if anything to be gained by releasing additional sites.”
- Notwithstanding the above comments, the Glasgow and the Clyde Valley Strategic Development Planning Authority does recognise the current uncertainties in the market, and the difficulties facing the construction sector. In the short term, with constrained development finance, it is recognised that some additional small sites may facilitate developers in re-establishing supply, and this is addressed in the Proposed Plan in Strategic Support Measure 10 (for more detail see Issue 27 Strategy Support Measure 10 Housing and Local flexibility).
- The Glasgow and the Clyde Valley Strategic Development Planning Authority views this approach as a pragmatic response to highly unusual short term circumstances, and would permit local authorities to exercise their detailed knowledge of local

market circumstances.

- In conclusion, it is the view of the Glasgow and the Clyde Valley Strategic Development Planning Authority that there is a generous supply within the effective land supply and the Urban Capacity Study to meet the demand projected in the Proposed Plan and therefore there is no requirement for additional strategic housing land release.
- Without a strategic requirement for additional housing land, it is considered that the Local Development Plan is the appropriate vehicle to consider any requirement for additional housing land. Strategic Support Measure 10 'Housing development and local flexibility' gives Local Authorities, where appropriate, the mechanism to augment their private sector supply to 2020 with the release of additional limited scale sites.

Response to specific modifications sought

E12 Cemex UK Ltd.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to remove reference to a surplus of effective and established land to meet private sector housing demand in Schedule 6 (page 43) and para 4.84 (page 48).

- A surplus of private sector housing land of nearly 11,000 units at 2025 has been identified in the Housing Need and Demand Assessment and the methodology has been deemed to be 'robust and credible' by the Scottish Government. It is the Authority's view, in line with the explanation above, that there is no shortfall in the private sector land supply and no basis for this modification.

E18 Wm. Short esq., E19 Duchal Estate, E20 H. J. Paterson, E34 James Barr Ltd E35 Messrs Keith & John Lawrence

- The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to amend Schedules 8 and 9 to include additional housing land release. As argued above, there is no strategic requirement for additional housing land release and therefore no change is required.

E42/2 Lynch Homes, E45/2 CALA Homes (West)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to replace the text in paragraph 4.71.

- The Proposed Plan has clearly stated why it has not set out a strategic housing requirement for all tenures, in paragraph 4.80. This is dealt with in greater detail in Issue 22 All Tenure Housing Requirement, while Issue 20 deals with Generous Land Supply.
- It is also considered that paragraph 4.70 outlines the role of the Local Development Plan in ensuring a five year effective land supply. It is not considered necessary for the Proposed Plan to reiterate Scottish Planning Policy to Local Development Planning authorities.

E42/4 Lynch Homes, E45/4 CALA Homes (West)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to paragraph 4.70.

- The Proposed Plan has clearly stated why it has not set out a strategic housing requirement for all tenures in paragraph 4.80. This is dealt with in greater detail in Issue 22 All Tenure Housing Requirement.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to paragraph 4.72.

- The Proposed Plan is clear in its Spatial Vision and Strategic Development Strategy to prioritise brownfield development. It is a fundamental plank of strategic and local planning that there is more than 'limited scope' to alter market perceptions and promote mixed sustainable communities in renewal and regeneration areas. All regeneration and sustainable strategies would fail were there to be such a limitation and experience of strategy since the mid-1970s has demonstrated the scale of opportunity available positively to alter market perceptions and bring market housing into the sustainable development and regeneration process.
- The Proposed Plan is consistent with National Planning Framework for Scotland 2, Paragraphs 85, 87, 89 and 91 (Supporting Document 10).
- It is not considered appropriate for the Proposed Plan, with its focus on Vision and Strategy, to instruct Local Development Plans in regard to Affordable Housing policies. It is the role of the Local Housing Strategy to determine Housing Supply Targets. Local Development Plans are required to accord with the strategy of the Strategic Development Proposed Plan.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed deletion and substitution of Schedules 6, 7, 8, and 9 with corresponding text changes to paragraphs 4.72 and 4.77.

- The Strategic Development Planning Authority's position in regard to All Tenure is detailed in Issue 22 and its position with regard to effectiveness of the housing land supply is detailed above.
- There is no requirement for annualised housing requirements to year 7 in a Strategic Development Plan.
- It is also not considered appropriate to use a 2010 Draft Housing Land Audit when it has not been finalised with Homes for Scotland.
- The Housing Need and Demand Assessment is based on a finalised 2009 Housing Land Audit and the Proposed Plan, as per Guidance, is framed by the results of the Housing Need and Demand Assessment.

E46/1 Susan Barnes (Landowner)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Diagram 4.

- The section 'Network of Centres' refers specifically to retail centres and therefore it is considered inappropriate to make a modification relative to strategic housing allocations for an overtly local planning issue.

E46/2 and E46/4 Susan Barnes (Landowner)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to paragraphs 4.15 and 4.75.

- It is considered that any additional local-scale housing land requirement is dealt with sufficiently through Strategic Support Measure 10 and through Local Development Plans.

E55/4 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to paragraph 4.72.

- The Proposed Plan is clear in its Spatial Vision and Strategic Development Strategy to prioritise brownfield development.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to paragraph 4.75.

- It is considered that paragraph 4.70 outlines the role of the Local Development Plan in ensuring a five year effective land supply.
- It is not considered necessary for the Proposed Plan to reiterate Scottish Planning Policy to Local Development Planning authorities.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to paragraph 4.78.

- The Proposed Plan already states clearly in paragraph 4.78 that backlog need has been included, in part, in the private sector projections over the 10 year period (2009-2019) as recommended in the Scottish Government's Housing Need and Demand Assessment Guidance (Supporting Document 13); as a consequence demand is higher in the first planning period (2009-2020).

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to paragraph 4.84.

- The Proposed Plan states, in paragraphs 4.83 and 4.84, that the Intermediate Sector is a potential sector which is a sub-set of the Affordable sector and recognises that some households in this sector may be more mobile than the social-rented sector.
- Details of defining the Affordable sector Housing Market Area can be found in Housing Need and Demand Assessment Technical Appendix TA01 A Housing Market Area Framework, paragraphs 5.1-5.5 (Supporting Document 14)
- Local authorities, through their Local Housing Strategies, will identify Housing Supply Targets for the Affordable sector at the appropriate geography.

It is considered that flexibility has been incorporated in Strategy Support Measure 10.

Reporter's conclusions:

1. It is not the role of the strategic development plan to assess or confirm the deliverability of specific sites, including community growth areas, and this plan does not do so. However it is appropriate that it requires local development plans not only to seek to ensure that a five years' effective housing land supply is maintained at all times throughout their plan periods, but also to demonstrate that the sites which they allocate are likely to be capable of delivering the identified housing requirements for the relevant plan periods.

2. In this case, the plan should make clear that this requirement on local development plans relates not only to land for the period up to 2020, but also for the period from 2020 to 2025, as identified in the plan. By doing so, the local development plans will deliver the necessary effective housing land supply not only for the period up to 2020, but can also ensure that there is still an effective housing land supply at 2020 for the following five years. This is consistent in both respects with Scottish Planning Policy which requires, in areas where there is a strategic development plan, that local development plans should allocate land on a range of sites which is effective or capable of becoming effective to meet the housing land requirement up to year 10 from the predicted year of adoption, ensuring a minimum of 5 years effective land supply at all times.

3. The comparison of private sector supply and demand set out in Schedules 8 and 9 is derived largely from an assessment by the eight individual planning authorities of the sites

which each has identified in an urban capacity study, in addition to those within the effective housing land supply identified in the 2009 housing land audit. Some of the urban capacity study sites remain confidential and the assessment of their deliverability, including physical, social and educational infrastructure constraints, has not been made available for open or public scrutiny. It is appropriate for that to await the preparation of the local development plans, when alternative or additional sites may also be identified and assessed.

4. In the meantime, the plan should clarify that the assessment contained in Schedules 8 and 9 is, at this stage, indicative and that it will require to be addressed in detail and be open to scrutiny through the preparation of each of the local development plans. Clearly, the application to these sites of an affordable housing quota policy could also result in a deficit, rather than a surplus, in the projected private sector housing supply to 2025, but this may vary between local development plan areas.

5. The retention within the plan of the 13 community growth areas is appropriate given the optimistic economic assumptions which underpin the authority's choice of the higher migration population projection as the basis of its vision for Glasgow and the Clyde Valley. There is no evidence to confirm that they will not prove effective and deliver the expected 19,000 houses in the medium to longer term. However, a continuation of the current difficult market conditions may affect the anticipated output of house completions from the community growth areas in the period up to 2020. In that event, the relevant local development plans would require to secure alternative sources of effective housing land for that period, whether or not through greenfield releases, to remedy any emerging shortfall and to ensure that the vision underpinning the plan can still be realised.

6. As set out at Issue 27, the provision of additional flexibility through Strategy Support Measure 10 to ensure the continued maintenance of the five years' effective housing land supply in each local authority area as well as across Glasgow and the Clyde Valley is therefore necessary to the successful delivery of the spatial vision of the plan. It is also appropriate to ensure that its wording enables that objective to be achieved.

7. While some of the representations seek confirmation that the release of additional housing land is required, most do not seek further large scale strategic releases, such as in the form of the community growth areas. However, I agree that local development plans will have to address the need for new sites to be allocated in order to implement the all-tenure housing requirement (see Issue 22). This is likely to include new sites which have been identified through the urban capacity studies, but also others which emerge in the course of the preparation of the local development plans. Each will require to be the subject of the strategic environmental assessment process, but also tested in relation to deliverability so as to confirm that it is likely to become effective during the relevant plan period.

Reporter's recommendations:

The modifications to the plan arising from the conclusions reached on Issues 17, 19 to 23, and 27 are set out in the Annex which follows Issue 27.

Issue 18	Removal of Community Growth Areas	
Development plan reference:	Philosophy and Principles The Spatial Development Strategy Model	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
E28 Bishopton Action Group E49/2, E49/3, E49/4 Jackton & Thorntonhall Community Council		
Provision of the development plan to which the issue relates:	Diagram 3 (page 3) Diagram 9 (page 17) Paragraphs 4.14 and 4.15 (page 19) Schedule 1 and Diagram 10 (page 21) Diagram 20 (page 61) Schedule 14 (pages 62 and 63)	
Planning authority's summary of the representation(s):		
<p>E28 Bishopton Action Group The retention of Bishopton Community Growth Area in the Spatial Development Strategy fails to demonstrate that it has fully taken account of the need for the prioritisation of resources in light of current economic circumstances.</p> <p>The economic and demographic projections underlying the Proposed Plan, in particular, the optimistic household projections (paragraph 4.71) result in an over- generous allocation of housing land (Schedules 8 and 9) and as such do not align with a continuing strategic role for Bishopton as set out in paragraphs 4.14 and 4.15.</p> <p>E49/2, E49/3, E49/4 Jackton & Thorntonhall Community Council Given the delay in delivering the Community Growth Areas, promoted in the 2006 Joint Structure Plan, due to current economic conditions</p> <ul style="list-style-type: none"> • the lower than projected growth in household formation • a significant increase in capacity from 'windfall sites' • the preference for development of 'brownfield' over 'greenfield' sites <p>all the Community Growth Areas and references in related Schedules and Diagrams should be removed from the Strategic Development Plan Proposed Plan.</p>		
Modifications sought by those submitting representations:		
<p>E49/2, E49/3, E49/4 Jackton & Thorntonhall Community Council seek the removal of all Community Growth Areas from the Proposed Plan.</p> <p>E28 Bishopton Action Group seek the removal of the Bishopton Community Growth Area, with consequential amendments to Diagrams 3, 9, 10, 20, Schedules 1, 14 and Paragraphs 4.14 and 4.15 of the Proposed Plan.</p>		
Summary of responses (including reasons) by planning authority:		
It is important to note that many of the housing issues are inter-related and other aspects		

of the representations will be addressed more fully in other Schedule 4's, notably Issues 17 - 27: The relationship between the housing issues is detailed in the Housing Land - A Strategic Overview topic paper.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects both the proposal to delete all the Community Growth Areas and the proposal to delete only the Bishopton Community Growth Area.

Community Growth Areas

The thirteen Community Growth Areas, which were set out in the 2006 Joint Structure Plan (approved by Scottish Ministers on 29th April 2008) with an estimated capacity of approximately 19,000 houses, are a fundamental component of the long-term sustainable urban expansion of the city region (Joint Structure Plan 2006 Technical Report TR6/06 – refer Schedule 4 Issue 5 'Spatial development Strategy Model).

The Glasgow and the Clyde Valley Strategic Development Planning Authority considers the Community Growth Areas to make a significant contribution (approximately 20% of the Established Land Supply) to the provision of a 'generous housing land supply' particularly into the medium and longer term.

In addition, the Glasgow and the Clyde Valley Strategic Development Planning Authority considers the Community Growth Areas to support the economic and demographic framework of the Strategic Development Plan as set out in Section 2 (pages 8 to 10) with its higher migration projection based upon support for the Scottish Government's low carbon economic strategy.

The Authority acknowledges that the economic conditions experienced since 2008 have had an impact upon planned development growth rates inherent in the predecessor strategic plan of 2006, and that the delivery of some Community Growth Areas will be delayed until market conditions recover. That delay factor is integral to the economic and related demographic foundation of the Proposed Plan which seeks to take a longer view to 2035.

The Glasgow and the Clyde Valley Strategic Development Planning Authority recognises that, whilst few of the Community Growth Areas are currently under construction due to current economic conditions, they all either

- have been integrated into Local Plans or
- have been the subject of master planning or
- have been granted planning permission.

In this context, the Bishopton Community Growth Area outline planning consent was granted by Renfrewshire Council on 10th August 2009, subject to a number of pre-start conditions (Supporting Document 1). These conditions are currently in the process of being discharged by the owner, BAE systems, particular in relation to decontamination and transportation matters, whilst road construction consent for the northern access road has been submitted to Renfrewshire Council. In addition, the new site access works are well advanced and detailed discussions are on-going with Transport Scotland in respect of the new motorway junction.

A number of organisations have expressed support for the Community Growth Areas (Supporting Document 2), in particular, (E55/2) Homes for Scotland consider the Community Growth Areas to be a 'cornerstone of the housing land supply', (E8) Taylor Wimpey support the context and concept of the Community Growth Areas and (E24) the Banks Group, welcome the inclusion of Community Growth Areas as a core component of the Spatial Development Strategy.

In conclusion, the Glasgow and the Clyde Valley Strategic Development Planning Authority considers the Community Growth Areas to be a fundamental 'building-block' of its long-term sustainable Spatial Development Strategy and that their delivery will be dictated by the pace with which market conditions return to pre-Recession rates.

Reporter's conclusions:

1. The community growth areas identified through the current structure plan have the potential to deliver a significant proportion of the housing requirements of Glasgow and the Clyde Valley in the period to 2025, and to do so in the form of sustainable new communities despite mainly comprising greenfield land. They can therefore make a significant contribution to delivering the vision and strategy of the plan.

2. The authority has chosen to adopt the higher migration population projection as the basis for its vision for the area in the knowledge of the economic downturn of the last three or four years. The success of its strategy will clearly depend upon economic recovery being secured. In that context, there is no compelling evidence that the community growth areas cannot be delivered in the period to 2025. However it will be important that the relevant local development plans re-assess the deliverability and likely effectiveness of each community growth area prior to confirming the re-allocation of that land. Confirmation of delays in starting to develop community growth areas may require alternative sites, where house completions can be secured in the period to 2020, to be allocated in the relevant local development plans.

Reporter's recommendations:

No modifications.

Issue 19	Housing Market Areas	
Development plan reference:	Spatial Framework 3 Sustainable Communities	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E8 Taylor Wimpey UK Ltd E42/3 Lynch Homes E45/3 Cala Homes (West) E51/1 Scottish Government (Directorate for the Built Environment) E52/12 Mactaggart and Mickel (Homes) Ltd. E55/4 Homes for Scotland</p>		
Provision of the development plan to which the issue relates:	<p>Diagram 17 (page 41) Paragraph 4.76 (page 42) Schedule 9 (page 45)</p>	
Planning authority's summary of the representation(s):		
<p>E8 Taylor Wimpey UK Ltd, E42/3 Lynch Homes, E45/3 Cala Homes (West), E52/12 Mactaggart and Mickel (Homes) Ltd. and E55/4 Homes for Scotland Consider the current system of Housing Market Areas to be contrived and unnecessarily complicated, thus making it difficult for the public to understand and that a simpler single tier housing market area based on local authority areas would be more appropriate. The current system of Housing Market Areas for private sector housing is no longer appropriate and should be replaced by local authority boundaries.</p> <p>E55/4 Homes for Scotland Cross reference required in paragraph 4.76 to the relevant section of a Background Paper which indicates how the Housing Market Area analysis has been translated into the Council area estimates. This is considered particularly important as around 20% of all demand is mobile.</p> <p>E51/1 Scottish Government (Directorate for the Built Environment) If the Reporter considers that the Proposed Plan does not deliver a generous supply of land, then Schedule 9 should be re-worked to identify the shortfall in each sub-market area, including a distribution of mobile demand.</p>		
Modifications sought by those submitting representations:		
<p>E8 Taylor Wimpey UK Ltd, E42/3 Lynch Homes, E45/3 Cala Homes (West), E52/12 Mactaggart and Mickel (Homes) Ltd. and E55/4 Homes for Scotland Amend Diagram 17 'Housing Market Areas' to reflect local authority boundaries.</p> <p>E8 Taylor Wimpey In the context of unitary local authority housing market areas, a limited allowance i.e. 15%, for immediate cross-boundary movement and in migration should be applied.</p>		

E55/4 Homes for Scotland

Amend paragraph 4.76 to include cross reference to the relevant section of a Background Report which indicates how the Housing Market Areas analysis has been translated into the Council area estimates.

E51/1 Scottish Government (Directorate for the Built Environment)

Amend Schedule 9 to identify any identified shortfall in each sub-market area including a distribution of mobile demand.

Summary of responses (including reasons) by planning authority:

It is important to note that many of the housing issues are inter-related and other aspects of the responses will be dealt with more fully in other Schedule 4's, notably Issues 17 - 27: The relationship between the housing issues is detailed in the Housing Land - A Strategic Overview topic paper.

E8 Taylor Wimpey UK Ltd, E42/3 Lynch Homes, E45/3 Cala Homes (West), E52/12 Mactaggart and Mickel (Homes) Ltd. and E55/4 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects these modifications on the basis that

- it considers the system of distinct Housing Market Areas as a basis for assessing private sector supply and demand within the Glasgow and the Clyde Valley area to be a long-standing one which has been confirmed through continuing reviews in terms of its appropriateness. This fact has been accepted by the Scottish Government as the basis of housing analysis in predecessor strategic plans, including most recently the 2000 and 2006 Structure Plans.
- The evidence for developing the Housing Market Area system is provided by Sasines data, in combination with the results from Housing Choice Surveys. This evidence shows that house buyers consider a wider area for the purchase of their home than any one Council area. It is therefore appropriate that this is reflected in the Strategic Development Plan housing demand assessment, which recognises local and mobile demand within a housing market area context.
- The housing market area framework has been subject to on-going review to ensure its continued relevance, including
 - the 2000 and 2006 Structure Plans (Glasgow and the Clyde Valley Joint Structure Plan 2000, Technical Report 5 'A Housing Market Area Framework') (Supporting Document 1)
 - the Glasgow and the Clyde Valley Joint Structure Plan 2006, Technical Report TR1/06 'Review of Supply and Demand for Housing' Appendix One) (Supporting Document 2) and
 - most recently as part of the Housing Need and Demand Assessment (Housing Need and Demand Assessment Final Report, Technical Appendix TA01 'A Housing Market Area Framework') (Supporting Document 3).
- The housing market area framework meets the requirements of the Scottish Government's Scottish Planning Policy (Supporting Document 4 - page 14, section 68) which explicitly acknowledges the fact that local authority boundaries will seldom align with the reality of housing market geographies.
- The Glasgow and the Clyde Valley Housing Need and Demand Assessment, which includes the methodology for defining housing market areas, has been declared

'robust and credible' in a letter from the Scottish Government's Centre for Housing Market Analysis in June 2011 (Supporting Document 5).

- The Scottish Government's Housing Need and Demand Assessment Guidance (March 2008) Page 7 (Supporting Document 6) explains that where a Housing Need and Demand Assessment is 'robust and credible' its approach will not be considered at examination.
- Housing Need and Demand Assessment Final Report, Technical Appendix TA01 'A Housing Market Area Framework' (Supporting Document 3) sets out the outcome of an updated analysis of Sasines data covering the period 2002-08 in order to test the validity of the current Housing Market Area system and to consider whether any changes were required.
- The process involved two stages (i) the identification of areas to form the building blocks of the system, and (ii) the examination of the inter-relationships between the building blocks to identify housing market operating over a wider area. The analysis concluded that the most appropriate framework for the private sector remained the three tier housing market area system consisting of Tier 1 - Conurbation; Tier 2 - Central and Eastern Conurbation and Tier 3 - 11 Housing Sub-Market areas and 2 Discrete market areas.
- It is considered that using the suggested local authority areas would be an essentially expedient approach that a) would distort the reality of the operation of the private housing market and b) would not be evidence-based as required for the Housing Need and Demand Assessment.

E55/4 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects these modifications on the basis that

- Scottish Planning Policy requires planning authorities to assess housing requirements by housing market area recognising in paragraph 68 (Supporting Document 4) that they will rarely coincide with local authority boundaries.
- However, Scottish Planning Policy also requires the Strategic Development Plan to set out housing requirements by local authority area.
- Schedules 8 and 9 of the Proposed Plan set out the private sector housing requirements by Housing Market Area. So as to satisfy the requirements of the Scottish Planning Policy, Schedule 7 of the Proposed Plan sets out housing requirements by local authority area. As the assessment of private sector housing requirements is undertaken at the Housing Market Area level, consequently, the local authority figures presented have to be approximated (as indicated in the Notes at the foot of Schedule 7, page 43). This approximation is calculated by taking the projected new build in the Conurbation and its discrete Housing Market Areas (2009 Housing Land Audit and Urban Capacity Study) and subtracting the surplus identified in the Housing Market Area assessment (Schedules 8 and 9).
- Planned housing figures by Council area therefore reflect both housing demand and available supply. The location of the available housing land supply determines in which Council area(s) the mobile part of the housing demand will be met.

- The Housing Need and Demand Assessment, Technical Appendix TA01 'A Housing Market Area Framework' (Supporting Document 3) and related Technical Appendix TA06 Section 8 paragraph 8.22 (Supporting Document 7) sets out in detail the Housing Market Area framework, explaining mobility within the Conurbation and that it is not possible accurately to translate a housing market area outcome into a local authority figure.

E8 Taylor Wimpey UK Ltd

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects these modifications on the basis that

- Scottish Planning Policy requires planning authorities to assess housing requirements by housing market area recognising in paragraph 68 that they will rarely coincide with local authority boundaries (Supporting Document 4). However, Scottish Planning Policy also requires the Strategic Development Plan to set out housing requirements by local authority area.
- The proposal for a 15% allowance for immediate cross-boundary movement and in migration acknowledges mobility in housing demand between settlement areas beyond existing local authority boundaries as incorporated within the housing market area framework in terms of private sector supply and demand. No evidence has been submitted in support of the figure of 15% which appears to be an arbitrary figure. The Glasgow and the Clyde Valley Strategic Development Planning Authority has reviewed the current Housing Market Area system (Supporting Document 3) and in its view its evidence-led approach reconfirms the appropriateness of the current Housing Market Area system.

E51/1 Scottish Government (Directorate for the Built Environment)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this modification on the basis that

- this representation prejudices the Reporters' consideration of the 'generous land supply' issue (Issue 20 Schedule 4 Generous Land Supply).
- Notwithstanding, it should be noted that it would be inappropriate to include an allocation of mobile demand in a comparison of supply and demand for individual housing sub-market areas.
- By its nature, both local and mobile demand are considered within the three tiers of the Housing Market Area framework. Detail relating to local and mobile demand within the Housing Market Area system is set out in Housing Need and Demand Assessment, Technical Appendix TA06 'Review of Supply and Demand/Need for Housing' Section 8 (Supporting Document 7)

Reporter's conclusions:

1. Scottish Planning Policy confirms that it is appropriate that the housing need and demand assessment should be undertaken at a functional housing market area level, and acknowledges that this will rarely co-incide with local authority boundaries. However it also confirms that, in city regions, the strategic development plan should indicate where land is to be allocated in local development plans for the period up to 12 years following adoption of the plan, and how much of that should be on sites to be allocated in the local development plan which are capable of development by the end of year 7. (See also Issue 17)

2. The identification of housing market areas in the housing need and demand assessment has clearly assisted the authority's understanding of the operations of the private sector housing market across Glasgow and the Clyde Valley. However it has found local authority boundaries to be the appropriate basis for assessing needs and requirements in the affordable sector and, as is reflected in Schedule 7, that is also the necessary basis for identifying how the assessed demand for private sector house completions is to be met through site allocations in local development plans.
3. The schedule enables the local planning authorities, developers, infrastructure and service providers and local communities to know, even in circumstances where a housing market area overlaps separate local authority boundaries, the scale of the private sector housing requirement which should be met through land allocations in each of the relevant local development plans.
4. As set out in Issue 22, combining the information in Schedules 7 and 10, albeit subject to necessary caveats, will enable an all-tenure housing requirement to be identified for each local development plan area, consistent with Scottish Planning Policy.
5. Issue 20 deals separately with the question of how 'generous' the housing land supply should be in order to meet the identified housing requirements, and thus be reflected in site allocations. This includes accommodating, if relevant, cross-boundary movement or differential demand between local authority areas, although I agree that there is no evidence before me to justify applying a 15% allowance for this purpose in each area, and any such flexibility should be subject to prior agreement between the two local authorities. (See also Issue 22.)
6. In these circumstances, it is not necessary to amend Schedules 8 or 9, except to clarify that they illustrate how the authority has identified that the preliminary assessment of the land which may be available from the housing land audits and the urban capacity study could meet the projected demand for private sector housing across Glasgow and the Clyde Valley.
7. The figures currently set out in schedules 7 and 10 should be amalgamated in a new schedule to confirm the all-tenure housing land requirement for each local authority and local development plan area for the periods to 2020 and 2025. These should be subject to the caveats identified at Issue 22 and also, as referred to in Issue 20, to a level of 'generosity' in land allocations to ensure that the scale of housing development can be delivered which is necessary to achieve the authority's vision for Glasgow and the Clyde Valley.
8. The allocation of land for new house building will inevitably influence the way the housing market operates in a particular area, but there is no evidence before me that identifying housing land requirements by local development plan area would lead to an undesirable distortion of any housing market.

Reporter's recommendations:

The modifications to the plan arising from the conclusions reached on Issues 17, 19 to 23, and 27 are set out in the Annex which follows Issue 27.

Issue 20	Generous Land Supply	
Development plan reference:	Section 4 Spatial Development Strategy Sustainable Framework 3 Sustainable communities	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E8 Taylor Wimpey UK Ltd E9 Wallace Land E10 CALA Homes/Taylor Wimpey UK Ltd E14/1 Land Synergy E15/1 Bellisle Developments Ltd E18 Wm. Short esq. E19 Duchal Estate E20 H. J. Paterson E24 Banks Group E29/2 Ogilvie Homes Ltd E30 NHS Greater Glasgow and Clyde E31 Caledonian Properties E34 James Barr Ltd E35 Messrs Keith & John Lawrence E42/2 Lynch Homes E42/6 Lynch Homes E45/2 Cala Homes (West) E45/6 Cala Homes (West) E51/1 Scottish Government (Directorate for the Built Environment) E52/13 Mactaggart and Mickel (Homes) Ltd. E53/1 SRG Estates E55/4 Homes for Scotland</p>		
Provision of the development plan to which the issue relates:	Sustainable Framework 3 Sustainable communities (pages 40 to 49)	
Planning authority's summary of the representation(s):		
<p>The main issue relates to respondents questioning the generosity and flexibility of the housing land supply to meet identified housing requirements in the Proposed Plan. The issue is articulated in various ways by different respondents.</p> <p>Relevant individual representations are summarised below:</p> <p>E8 Taylor Wimpey UK Ltd Considers that there is a complete lack of real flexibility in the housing calculations and in remitting any additional releases of unquantifiable scale to the discretion of each Local Authority. This encourages differing attitudes of Councils in reacting to local demand issues; this is not helpful without some kind of strategic context.</p>		

E9 Wallace Land, E10 CALA Homes/Taylor Wimpey UK Ltd

Concerned that the Proposed Plan establishes a position that there is no need for any new strategic land releases and that there is continued reliance on the Urban Capacity Study; the strategy flowing from that does not serve to deliver 'a generous supply of land for housing' or 'give the flexibility necessary for the continued delivery of new housing' as required by Scottish Planning Policy.

E14/1 Land Synergy, E15/1 Bellisle Developments Ltd

Consider that it is likely that the effectiveness of the housing land supply has been significantly overestimated by the Strategic Development Planning Authority; consequently, to accord with Scottish Planning Policy, the Proposed Plan should provide the means of provision of a 'generous' supply of new effective sites from the outset of the plan period.

E18 Wm. Short esq., E19 Duchal Estate, E20 H. J. Paterson, E34 James Barr Ltd, E35 Messrs Keith & John Lawrence

These representations consider that the Proposed Plan does not take account of the current difficulties in delivering the established housing land supply, and consider that the Strategic Development Plan's housing targets are unlikely to be met unless this issue is addressed at the strategic level. The representations refer to comments in the Chief Planner's letter (October 2010, 'Providing an Effective Supply of Land for Housing') and consider that these comments have not been reflected in the Proposed Plan and that as a result the Plan should:

- include additional housing land release, revisiting Schedules 8 and 9 to reflect this;
- introduce flexibility for future housing land allocations;
- acknowledge the delays facing the deliverability of Community Growth Areas;
- specify the vital role that smaller, more deliverable sites could play in meeting housing needs early in the plan period.

E24 Banks Group

The following main points are raised:

- Considers that the Plan does not reflect the Chief Planner's letter of 29th October 2010 ('Providing an Effective Supply of Land for Housing') which requested that planning authorities review the effectiveness of their current housing land supply and that they should consider bringing forward more effective opportunities.
- Does not regard 6,000 house completions per annum as ambitious.
- Considers, in line with Planning Advice Note 2/2010, paragraph 62 that windfall sites cannot be regarded as part of the planned housing requirement and can only be considered effective once planning applications are approved.
- There is no evidence of a more generous housing land supply; much more flexibility should be given to Local Development Plans to deal with this.

E29/2 Ogilvie Homes Ltd

The Proposed Plan should aspire to much greater growth in the region and fails to allocate new housing land which conflicts with the policy requirements of Scottish Planning Policy and the Government's specific objective to provide a 'generous' supply of housing land, and the need to maintain a 5 year effective supply of housing land at all times. Both National Planning Framework for Scotland 2 and Scottish Planning Policy set out that the planning system should allocate a generous supply of land to meet identified housing requirements across all tenures.

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties

The Strategic Development Planning Authority should identify additional land for housing above and beyond that identified over the plan period. By identifying additional land then it would maintain flexibility in the land supply.

E31 Caledonian Properties

It is inevitable that some larger and more complicated sites such as the Community Growth Areas are likely to be unviable or difficult to fund during the plan period. Considers that additional sites should be allocated to compensate against sites becoming non-effective and ensure that flexibility is retained moving forward. It is considered that there is reliance by the Strategic Development Planning Authority on these sites and there should be a strategy in place to ensure that if these sites are not delivered then a mechanism is in place to allow for other sites to be brought forward.

E42/2 Lynch Homes, E45/2 CALA Homes (West)

The following main points are raised:

- Dismiss the asserted elements of flexibility in the Plan and seek to incorporate 'real' measures of flexibility.
- Scottish Planning Policy requires a 'generous' supply of appropriate and effective sites.
- The Plan claims that flexibility has been introduced through the following three ways, these claims are considered invalid for the following reasons:

i. Selection of demographic scenario (paragraph 4.65)

The assessment of the strategic housing requirement from the Housing Need and Demand Assessment is a matter of judgement for the Strategic Development Planning Authority. However, once this is selected then Scottish Planning Policy is clear on the implications for the Proposed Plan - this housing requirement should be met in full supported by a development strategy which can deliver the effective land supply to meet this level of sustainable growth. The Proposed Plan provides no element of flexibility other than the choice of the growth estimate.

ii. Overlap between assessed needs and household projections

Meeting the assessed backlog of housing need is one of the outcomes from the Housing Need and Demand Assessment process. This critical component of housing need and demand was not taken into account in previous Structure Plan methodologies to assess strategic housing requirements. Backlog of need is part of the new methodology to assess the strategic housing requirements. It is not an element of flexibility. The key concern for the strategic development strategy is the approach to be adopted to meet this backlog. This is not flexibility but a key element of the development strategy.

iii. Discounting windfall sites from supply

Scottish Government only wishes to include future sources of land supply which are identified such as allocated land and sites with planning permission. This helps ensure that an effective housing land supply is evident. Excluding this source of land supply does not increase flexibility.

- Considers further flexibility can be provided by ensuring that appropriate policy mechanisms are in place in the Local Development Plans to ensure that a 5 year effective land supply is available at all times.

E42/6 Lynch Homes, E45/6 CALA Homes (West)

Consider that there is a lack of flexibility in the Plan, resulting in no new land for private housing. Scottish Planning Policy obliges development plans to maintain a 5 year effective

housing land supply at all times. This provides a generous land supply. This flexibility is needed in the Proposed Plan and this has not been addressed.

E51/1 Scottish Government (Directorate for the Built Environment)

Raises the following main points:

- the Proposed Plan does not demonstrate that there is sufficient evidence in the proposed plan or its supporting papers to demonstrate that the plan identifies a generous supply of land to meet identified housing needs across all tenures, as sought by Scottish Planning Policy.
- Paragraph 4.67 of the Proposed Plan explains the different affordability assumptions that have been used for calculating housing needs in the market and affordable sectors. Nevertheless it is considered evidence exists in the Housing Need and Demand Assessment on which to base an overall housing requirement figure across all tenures, and that this should have been the starting point for the consideration of housing land supply issues in the plan.

E52/13 Mactaggart and Mickel (Homes) Ltd.

- the private sector requirement remains too cautious and does not follow government guidance in seeking to provide a generous housing land supply.
- acknowledges 10% surplus forecast, however, proposes a generous surplus would be 25-33% at the outset.

E53/1 SRG Estates

The following main points are raised:

- disputes that flexibility is built into the Proposed Plan in paragraph 4.71. Considers that additional land must be allocated to encourage development in a depressed market.
- the reference to 'generous allocations of land for future housing' is challenged given the wider economic context i.e. it is considered that Community Growth Areas are unlikely to be effective in the short term so supplementary alternative proposals/strategies should be identified at a strategic level in order to avoid resultant unmet demand.

E55/4 Homes for Scotland

The following main points are raised:

- does not agree fully with paragraph 4.71, while higher population projections than General Register Office for Scotland (now National Records of Scotland) are elements of flexibility, backlog need and discounting of windfall sites are not.
 - Housing Need and Demand Assessment Guidance is clear that backlog need is part of the core projection of need and therefore cannot be considered flexibility.
 - Planning Advice Note 2/2010 states in paragraph 62 that windfall sites are not part of the planned housing supply, should not be counted towards meeting the housing requirement, and are only effective once planning consent is granted. The implication is that the Plan expects effective housing land supplies to be augmented in practice by windfall; however, this does not conform to the requirement in Scottish Planning Policy that there is a 'generous' land supply actually allocated in the development plan.

- It would be helpful to know how much additional flexibility the Strategic Development Planning Authority actually believes is built into the Housing Need and Demand Assessment projections, as this information is not quantified anywhere. Our position is that the Housing Need and Demand Assessment projections are a starting point, onto which additional flexibility is built by the provision of a generous allocated land supply.
- Document HFS2, supplied as a supporting document to their representation, sets out Local Authority requirements and supply – the close correspondence of figures questions if this represents ‘generous’ land supply. Reference is made to research by Turley Associates, provided as a Supporting Document to the representation HFS3, suggesting that 25-30% of assumed housing land supplies never come to fruition. (Holder, Robin and Pickles, Helen, Turley Associates (2008) “The Effectiveness of Housing Land Audits in Monitoring Housing Land Supply in Scotland”. Edinburgh: The Scottish Government Social Research, Page 15.)

Modifications sought by those submitting representations:

E8 Taylor Wimpey UK Ltd

No specific modifications sought.

E9 Wallace Land, E10 CALA Homes/Taylor Wimpey UK Ltd

No specific modifications sought.

E14/1 Land Synergy, E15/1 Bellisle Developments Ltd

The Strategic Development Plan should provide a generous supply of new effective sites from the outset of the plan period which will assist in the maintenance of a continuous effective supply of housing land and the realisation of the spatial development strategy. (Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land).

E18 Wm. Short esq., E19 Duchal Estate, E20 H. J. Paterson, E34 James Barr Ltd, E35 Messrs Keith & John Lawrence

Taking account of difficulties in delivering the established housing land supply, revise Schedules 8 and 9 to include additional housing land releases. The plan should also be modified to introduce flexibility for future housing land allocations. (Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land).

E24 Banks Group

Consideration needs to be given to the release of additional land in more effective locations to accommodate the short term impact of the current economic recession. This should be achieved through a combination of medium sized sustainable locations and by a more liberal approach to small scale locations of under 50 houses which are not classified as major development within the new hierarchy of development within the Planning etc. (Scotland) Act 2006, to allow the provision of a wider range of opportunities. Local Development Plans should be given more flexibility to provide a generous housing land supply.

Windfall sites cannot be regarded as part of the planned housing requirement and can only be considered effective once planning applications are approved. (Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land).

E29/2 Ogilvie Homes Ltd

Failure to allocate new housing land conflicts with the policy requirements of Scottish

Planning Policy, and the Government's specific objective to provide a 'generous' supply of housing land, and the need to maintain a 5 year effective supply of housing at all times. Both National Planning Framework for Scotland 2 and Scottish Planning Policy set out that the planning system should allocate a generous supply of land to meet identified housing requirements across all tenures.

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land).

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties

The Glasgow and the Clyde Valley Strategic Development Planning Authority should identify additional land for housing above and beyond that identified over the plan period. By identifying additional land then it would maintain flexibility in the land supply.

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land and Issue 27 Strategy Support Measure 10 Housing and Local Flexibility).

E31 Caledonian Properties

Additional sites should be identified to compensate for sites becoming non-effective such as Community Growth Areas, and there should be a strategy in place to ensure that if these sites are not delivered then a mechanism is in place to allow for other sites to be brought forward.

(Related aspects are dealt with in Issue 27 Strategy Support Measure 10 Housing and Local Flexibility).

E42/2 Lynch Homes, E45/2 CALA Homes (West)

Seek the following modifications because it is misleading to suggest that these elements add flexibility to the Proposed Plan:

- delete last sentence in paragraph 4.65 "The demographic scenario is the first of several elements of flexibility built into the Housing Need and Demand Assessment."
- delete last two sentences in paragraph 4.69 "There is also evidence to suggest an overlap between assessed needs and household projections. This represents another element of flexibility in the Housing Need and Demand Assessment."
- paragraph 4.71 delete existing text and replace with the following:
 "The overall strategic housing requirement for all tenures is shown in Schedule 6. Local Development Plans are expected to allocate sufficient land to meet these requirements and to maintain a 5 year land supply at all times. Councils will undertake appropriate assessments to ensure that all sites to be allocated are effective in accord with Scottish Government guidance and to assess the level of completions expected from these allocations and effective land supply to ensure that the 5 year land supply is maintained at all times. Councils have undertaken an Urban Capacity Study. Any sites which are effective should be allocated in the Local Development Plans. This will provide a valuable source of brownfield land in accord with the strategy. These approaches will ensure flexibility in the Strategic Development Strategy."

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land).

E42/6 Lynch Homes, E45/6 CALA Homes (West)

Specific modifications sought relate to Issue 27 Strategy Support Measure 10 Housing and Local Flexibility.

E51/1 Scottish Government (Directorate for the Built Environment)

Suggest that the Reporter invites the Glasgow and the Clyde Valley Strategic Development Planning Authority to revisit its housing requirement to 2025 to take account

of all tenures. In doing so the outputs of the Housing Need and Demand Assessment should be the starting point, but other factors including realistic prospects for the housebuilding industry, for growth, and for the availability of public subsidy to support affordable housing may also be taken into account. The Glasgow and the Clyde Valley Strategic Development Planning Authority should then be invited to identify a housing land requirement more than sufficient to accommodate this target (i.e. incorporating a generosity allowance), and taking account of a realistic assessment of the proportion of the established supply likely to become effective by 2025.

If the Reporter concludes from this exercise that the Proposed Plan does not deliver a generous supply of housing land, then we suggest that Schedule 9 of the Plan is reworked to identify the shortfall in each sub-market area (and including a distribution of mobile demand) and a requirement included in the Plan for the eight planning authorities to allocate land to meet these shortfalls through their Local Development Plans.

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land, Issue 22 All Tenure Housing Requirement and Issue 27 Strategy Support Measure 10 Housing and Local Flexibility).

E52/13 Mactaggart and Mickel (Homes) Ltd.

Seek the following modifications:

- A strategic plan that is consistent with government planning policy.
- Provide for allocations throughout each council area to ensure that effective housing opportunities are realised and that a generous housing land supply is maintained at all times throughout the plan area and over the plan period.

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land and Issue 27 Strategy Support Measure 10 Housing and Local Flexibility).

E53/1 SRG Estates

Specific modifications sought relate to Issue 17 Effectiveness and Additional Housing Land.

E55/4 Homes for Scotland

Seeks the following modifications:

- delete paragraph 4.71 entirely. Renumber remaining paragraphs accordingly.
- paragraph 4.75 delete third sentence and replace with: "These sources of supply represent the locations which Local Authorities should consider first when identifying land through the Local Development Plan. Local Development Plans must allocate a generous supply of land to meet requirements which is effective or capable of becoming effective, and should ensure through monitoring the maintenance of a minimum 5-year effective housing land supply at all times."
- paragraph 4.87 third sentence, delete all after 'local authorities' and replace with "...should identify generous supplies of housing land and should evaluate carefully the options for maximising the delivery of affordable housing as part of mixed and sustainable communities."

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land and Issue 22 All Tenure Housing Requirement).

Summary of responses (including reasons) by planning authority:

General

- This Issue addresses the question of whether the Glasgow and the Clyde Valley Strategic Development Planning Authority has interpreted satisfactorily the

requirement in Scottish Planning Policy (Supporting Document 1) for generosity in the land supply.

- Many of the housing issues are inter-related and other aspects of the response will be dealt with more fully in other Schedule 4's, notably Issues 17 - 27: The relationship between the various housing issues is detailed in the paper 'Housing Land - A Strategic Overview'.
- The Housing Need and Demand Assessment, the tool used to calculate housing requirements, is a new methodology.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority and Housing Market Partnership have produced a Housing Need and Demand Assessment that has been declared 'robust and credible' in a letter from the Scottish Government's Centre for Housing Market Analysis dated June 2011 (Supporting Document 2).
- The Scottish Government's Housing Need and Demand Assessment Guidance, Page 7 (Supporting Document 3) explains that where a Housing Need and Demand Assessment is 'robust and credible' its approach will not be considered at examination. Instead the examination will focus on the proposed spatial policies for housing set out in the Proposed Plan and their relationship with the findings of the housing need and demand assessment.
- However, a number of methodological issues and gaps were identified in the guidance (detailed in the Housing Need and Demand Assessment, 2011, Paragraph 1.47, Page 17 and Technical Appendix 6, Section 2 (Supporting Document 4)). Methodological solutions were agreed and developed by the eight Glasgow and Clyde Valley local authorities through their Housing Market Partnership to fill these gaps.
- The Housing Need and Demand Assessment, although looking to 2025, will be reviewed in five years (2016) alongside the Proposed Plan.
- To aid clarity, the process for establishing projected future housing requirements and housing land supply (summarised in Box 1 in Planning Advice Note 2/2010) (Supporting Document 5) needs to be transparent. Broadly, it comprises:
 - The Housing Need and Demand Assessment provides important underlying evidence for the Strategic Development Plan, Local Housing Strategies and Local Development Plans.
 - The Housing Need and Demand Assessment results, and issues arising, are to be assessed by Local Authorities in policy terms, and translated by them into Housing Supply Targets for all tenures, taking into account a range of factors.
- The spatial pattern of housing land supply requirement is then derived from the Housing Supply Targets in the form of a 'generous' land supply. This generosity offers flexibility in the system; for instance,
 - to resolve difficulties which may arise from sites not coming forward for development as anticipated or developments being delayed
 - to ensure a degree of choice in site availability and location
 - to cope with variability in demand and development so that the land supply should not constrain delivery of new homes...in particular so that it should not hinder the aspiration to raise the rate of new house building.

- Local Authorities must ensure at least a five year effective housing land supply at all times.
- Outcomes should be monitored, and the Housing Need and Demand Assessment, Local Housing Strategies and development plans should be reviewed and revised every 5 years.

The Authority's response considers two sub-issues, before addressing the specific modifications proposed:

- 1. Flexibility in the Housing Need and Demand Assessment Approach; and**
- 2. Generosity, before addressing the specific modifications proposed.**

Sub-issues

1. Flexibility in the Housing Need and Demand Assessment Approach (Paragraph 4.71)

The approach adopted by the Glasgow and the Clyde Valley Strategic Development Planning Authority, in preparing the Housing Need and Demand Assessment, favoured generosity in the assumptions used in three particular elements:

- *Population and household projections:* the Glasgow and the Clyde Valley Strategic Development Planning Authority prepared its own population and household projections using a 'tried-and-tested' approach (Issue 3 Economic and Demographic Framework). It was faced with the choice of either using the National Records of Scotland 2006-base projections, or preparing its own set of projections using the latest information (Housing Need and Demand Assessment Technical Appendix 6, Paragraph 5.1) (Supporting Document 6).
- An exercise has been undertaken which indicates that the projection adopted in the Proposed Plan is considerably more optimistic than the National Records of Scotland principal household projection (Housing Need and Demand Assessment, Chapter 3) (Supporting Document 7).
- The projection plans for 21,600 more households in the private sector to 2025 than that of the National Records of Scotland principal projection. This projection, in combination with three elements of flexibility (Proposed Plan, page 42, paragraph 4.71)
 - Optimistic household projections
 - Backlog need, over and above household projections
 - Discounting windfall locations

addresses the question by **E55/4 Homes for Scotland** which asked how much additional flexibility is built into the Housing Need and Demand Assessment Projections.

- The adoption of optimistic household projections is seen as reasonable in the context of an aspirational long-term plan to 2025 and 2035. The Proposed Plan, in line with legislation, takes a long term view. Short term market fluctuations are frequently integral to such a long term outlook.
- Similarly, the Housing Need and Demand Assessment recognised that in the short term, household growth would be less (Housing Need and Demand Assessment, Chapter 4, Page 91, paragraph 4.52) (Supporting Document 8). At the same time the Housing Need and Demand Assessment used assumptions on household

growth, which reflected longer term conditions. If we had focussed on the short term outlook, then the household projections would have been considerably lower.

- *Backlog Need:* the Scottish Government's Housing Need and Demand Assessment Guidance (Supporting Document 9) introduced the requirement to consider backlog need in the private sector for the first time in the context of strategic planning for housing.
- It is a complex concept, with potential for significant variation between authorities depending on local policy and interpretation. The Housing Need and Demand Assessment records concern at the potential for double counting between the household projections and backlog need (Chapter 5, Pages. 105-106, paragraphs 5.17 5.18) (Supporting Document 10). This methodological problem of potential double counting is highlighted also in a recent paper reviewing the experience of preparing Housing Need and Demand Assessments in Scotland: "Wagging the Dog: Assessing Housing Need" by Newhaven Research for the Chartered Institute of Housing in Scotland, 2011; Pages 36-37 (Supporting Document 11).
- Notwithstanding, in accordance with Housing Need and Demand Assessment Guidance, the full backlog need figures were used in projections. The Proposed Plan recognises that the adoption of the full backlog figure provides significant flexibility, although it could not be accurately quantified due to the inconsistencies between the different methodologies required for the private and affordable tenures.
- *Windfall:* the Strategic Development Planning Authority recognises that windfall sites cannot be counted towards meeting the housing land requirement until planning permission for housing has been granted or they are under development (Planning Advice Note 2/2010, Paragraph 62) (Supporting Document 5); for that reason windfall sites are not included in the Housing Land Audit or the Urban Capacity Study.
- However, it seems reasonable for the Proposed Plan to recognise that some additional housing sites are likely to come forward in this manner during the life of the Plan, offering some additional flexibility. The recognition of windfall sites as flexibility is particularly important in the Glasgow and Clyde Valley Conurbation where there is an established brownfield regeneration strategy. There is a constant supply of new sites emerging from regeneration processes, planned and unplanned, within the urban fabric and it is important to be mindful of this emerging supply.
- Research by Turley Associates for the Scottish Government, 'The Effectiveness of Housing Land Audits in Monitoring Housing Land Supply in Scotland', 2008, Page 15 (Supporting Document 12), suggested that new windfall sites more than made up for the "lack of delivery" from the existing supply within the five-year period studied, and even more so for the seven years over which the city-region authorities programme their supply. Due to their very nature windfall sites are unknown and it is not appropriate to attempt to quantify this sort of additional supply.

2. **Generosity**

- Scottish Planning Policy (Supporting Document 1) states that "The delivery of housing through the development plan to support the creation of sustainable mixed communities depends on a generous supply of appropriate and effective sites being made available to meet need and demand, and on the timely release of allocated sites" (Paragraph 70). In turn "Allocating a generous supply of land for housing in

the development plan will give the flexibility necessary for the continued delivery of new housing even if unpredictable changes to the effective land supply occur during the life of the plan” (Paragraph 71). “A supply of effective land for at least 5 years should be maintained at all times to ensure a continuing generous supply of land for house building (Paragraph 75).

- For the Proposed Plan period of 2009-25, for the private sector, there is considered to be a net requirement for 97,000 new housing completions. The land supply is estimated to offer 108,000 completions, leaving a surplus of 11,000 (Schedule 6 on page 43). This surplus is equivalent to around 11% on top of the requirement.
- Scottish Planning Policy does not provide a definition of ‘generosity’; it is left to the Strategic Development Planning Authority to take a balanced judgement on the matter. That judgement clearly must be taken in the context of wider policy considerations and other factors impinging on housing market circumstances.
- Given the aforementioned three factors of flexibility, the Strategic Development Planning Authority takes the view that it has provided a generous supply. The Authority does not accept that simply allocating more land will increase delivery of new homes (ref Issue 17 Effectiveness and Additional Land), in the absence of other fiscal measures to make debt financing more readily available and mortgages more affordable. The Authority has taken the view that a generosity allowance of 25% - 33% at the outset, as suggested by Mactaggart and Mickel (Homes) Limited (Representation E52-13), is unnecessary and has potentially significant negative consequences for the Spatial Vision and Spatial Development Strategy.
- Large additional land releases, as implied by many of the representations, would be also contrary to the Scottish Government’s National Planning Framework for Scotland 2, paragraphs 81 and 91) (Supporting Document 13) and its ‘direction of travel’ towards a low-carbon sustainable future.
- However, the Strategic Development Planning Authority is aware of economic circumstances which currently prevail with market volatility and uncertainty, and in recognition of these, the Proposed Plan has included Strategy Support Measure 10 to provide Local Authorities with the flexibility to respond to local circumstances.

Response to specific modifications sought

E8 Taylor Wimpey UK Ltd, E9 Wallace Land, E10 CALA Homes/ Taylor Wimpey UK Ltd; E14/1 Land Synergy, E15/1 Bellisle Developments Ltd, E18 Wm. Short esq., E19 Duchal Estate, E20 H. J. Paterson, E34 James Barr Ltd, E35 Messrs Keith & John Lawrence, E29/2 Ogilvie Homes Ltd, E30 NHS Greater Glasgow and Clyde, E53/1 SRG Estates

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications. These representations are non-specific in their request for allocation of additional land to ensure a generous housing land supply. Based on the foregoing arguments, the Strategic Development Planning Authority is satisfied that it has provided a generous supply, at around 11% of land supply, underpinned by significant flexibility in arriving at this figure. In reality, it would anticipate a ‘generosity’ level significantly in excess of the 11% figure.

E24 Banks Group, E31 Caledonian Properties

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications on the grounds that it has already allocated a generous land supply.

E42/2 Lynch Homes, E45/2 CALA Homes (West)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.65 on the grounds that the demographic scenario adopted does in fact comprise real flexibility, as detailed in Sub-issue 1 above.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.69 on the grounds that the methodology for calculating backlog need includes some element of overlap/double counting with the household projections, and the decision to use the full backlog figure errs on the side of flexibility, as detailed in Sub-issue 1 above.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to Paragraph 4.71 on the grounds that the three elements of flexibility specified offer significant flexibility, as discussed in Sub-issue 1 above. Furthermore the Proposed Plan already incorporates a generous land supply, as discussed in Sub-issue 2 above. There is therefore no requirement to re-calculate figures and provide an alternative Schedule 6.

E42/6 Lynch Homes, E45/6 CALA Homes (West)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications on the grounds that it has already allocated a generous land supply.

E51/1 Scottish Government (Directorate for the Built Environment)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications on the grounds that it has already allocated a generous land supply.

E52/13 Mactaggart and Mickel (Homes) Ltd.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects these proposed modifications on the grounds that it has already allocated a generous land supply, consistent with Scottish Planning Policy, as discussed in Sub-issue 2 above.

E55/4 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.71 on the grounds that the three elements of flexibility specified do offer flexibility, as discussed in Sub-issue 1 above.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.75 on the grounds that it has already allocated a generous land supply, as detailed in Sub-issue 2 above.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.87 on the grounds that it has already allocated a generous supply of housing land, as detailed in Sub-issue 2 above.

Reporter's conclusions:

1. Scottish Planning Policy confirms the Scottish Government's commitment to increasing the supply of new homes. It states that the planning system should contribute to raising the rate of new housebuilding by identifying a generous supply of land for the provision of a range of housing in the right places. The planning system should also allocate a generous supply of land to meet identified housing requirements across all tenures.

2. Although Scottish Planning Policy does not define or quantify what constitutes a generous supply of housing land, it does clarify its purpose. It states that the delivery of

housing through the development plan to support the creation of sustainable mixed communities depends on a generous supply of appropriate and effective sites being made available to meet need and demand, and on the timely release of allocated sites. It also advises that allocating a generous supply of land for housing in the development plan will give the flexibility necessary for the continued delivery of new housing even if unpredictable changes to the effective land supply occur during the life of the plan.

3. However, it is local development plans which allocate the sites for housing development. Scottish Planning Policy does not indicate that it is the role of the strategic development plan to specify or quantify the level of 'generosity' which should be sought in the total capacity of the allocated housing land supply over and above the housing requirement which is to be specified in the strategic development plan.

4. Instead, where there is a strategic development plan, Scottish Planning Policy states that the local development plans should allocate land on a range of sites which is effective or capable of becoming effective to meet the housing land requirement up to year 10 from the predicted year of adoption, ensuring a minimum of 5 years effective land supply at all times. It then confirms that a supply of effective land for at least 5 years should be maintained at all times to ensure a continuing generous supply of land for house building.

5. In these circumstances I consider that the role of the strategic development plan should focus on the housing requirements which are to be met by each local development plan. It should confirm that those plans should allocate sufficient sites to ensure that a five years' effective housing land supply is maintained at all times. By demonstrating that this can be delivered, those plans will confirm that the allocated housing land supply is sufficiently generous.

6. However, it will be for each local development plan to assess the additional capacity of housing land which it needs to provide over and above the housing requirements specified in the strategic development plan. Circumstances will vary depending on the presence of development constraints, progress in implementing community growth areas, the size and nature of the sites which are already allocated, and other local factors.

7. Schedules 8 and 9 of the strategic development plan do not in themselves allocate any sites, but simply indicate the potential contribution from sites in the 2009 housing land audits and the urban capacity study to meeting private sector housing demand in each housing market area. It is appropriate that the status of these schedules should be clarified through a modification to them and the associated text.

8. It is also appropriate that the text of this plan, including Strategic Support Measure 10, confirms that it is the role of local development plans to secure a five year effective housing land supply at all times, including at the year 2020 for the period to 2025. The text should also confirm that to do so it will be necessary for local development plans to demonstrate that the capacity of the sites allocated is sufficiently generous to secure the delivery of the housing requirements specified in the strategic development plan.

9. The scale of the housing land supply to be allocated in local development plans needs to be sufficient to ensure that the housing requirements specified in the strategic development plan can be delivered. The housing requirements in turn derive from the vision for Glasgow and the Clyde Valley articulated in the strategic development plan and which itself derived from the choice exercised by the authority to pursue both a growing economy and residential population based on higher migration population projections.

10. In that context, neither the authority's adoption of that growth scenario, nor its rejection of less optimistic population projections produced nationally, in themselves constitute elements of flexibility or generosity in terms of the scale of the housing land supply which the local development plans require to allocate. Deletion of the final sentence of paragraph 4.65 of the plan would clarify this.

11. With regard to elements of flexibility, as set out in my conclusions in relation to Issue 22, the all-tenure housing requirements which it is recommended should be included in this plan will be subject to certain caveats. These include the potential for them to be varied for the purposes of the local development plan where it can be demonstrated that there is restricted scope to meet backlog needs within the plan periods, or where double counting is shown to have occurred in calculating the all-tenure housing requirements.

12. However it is not recommended practice to reduce the housing land allocations to be made through local development plans by assuming that a certain level of house completions will be secured on windfall sites. Planning Advice Note 2/2010 confirms that these sites should count towards meeting the housing land requirement only once planning permission has been granted for residential development and they are considered to be effective or are being developed.

13. While this does not dilute the obligation to allocate sufficient housing land in local development plans, the output from windfall sites can contribute to fulfilling the planning authorities' duty to maintain a five years' effective housing land supply at all times. In addition, windfall sites that have emerged in recent years can be allocated for housing development in the new local development plans, and thus contribute to meeting the housing requirements specified in the strategic development plan.

14. The calculation of a 'surplus' of 11,000 houses for the private sector referred to in Schedule 6 reflects the indicative comparison carried out in Schedules 8 and 9. However little weight attaches to that calculation at this stage, as it will be for each local authority to demonstrate the effectiveness, or likely effectiveness, of the sites which it intends to allocate for housing development across all tenures in each local development plan. Account will also have to be taken of the effects of applying policies to secure a proportion of affordable housing on these sites. Doing so could reduce significantly their contribution to meeting private sector demand, while at the same time securing the delivery of affordable houses of a range of types.

15. I conclude that there is not a sufficiently robust basis for confirming in the strategic development plan that there is already a surplus in the housing land supply, either for the private sector or for all tenures. In these circumstances, the appropriate approach is for the strategic development plan to confirm that it will be for each local development plan to demonstrate that sufficient housing land has been allocated to meet both the housing requirement specified in the strategic development plan and the obligation to maintain a five years' effective housing land supply at all times.

16. This may require a range of additional sites to be allocated, particularly for the period to 2020 if difficulties persist in starting the development of the community growth areas. However I agree that there is no basis for sanctioning through this plan any further strategic land releases in the form of more such large scale sites even though these, as the authority has confirmed in the case of the existing proposed community growth areas, may enable the development of sustainable communities which contribute to the overall strategy.

Reporter's recommendations:

The modifications to the plan arising from the conclusions reached on Issues 17, 19 to 23, and 27 are set out in the Annex which follows Issue 27.

Issue 21	Urban Capacity Study	
Development plan reference:	Spatial Framework 3 Sustainable Communities	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E9 Wallace Land E10 CALA Homes/Taylor Wimpey UK Ltd E12 CEMEX UK Ltd. E14/1 Land Synergy E15/2 Bellisle Developments Ltd E24 Banks Group E49/4 Jackton & Thorntonhall Community Council E52/13 Mactaggart and Mickel (Homes) Ltd. E55/4 Homes for Scotland</p>		
Provision of the development plan to which the issue relates:	<p>Paragraph 4.75 (page 42) Schedule 1 on Diagram 10 (page 21) Schedules 6 (page 43), 8 (page 44), and 9 (page 45)</p>	
Planning authority's summary of the representation(s):		
<p>E9 Wallace Land/E10 CALA Homes/Taylor Wimpey UK Ltd/ E12 CEMEX UK Ltd/E14/1 Land Synergy/E15/2 Bellisle Developments Ltd/E52/13 Mactaggart and Mickel (Homes) Ltd/E55/4 Homes for Scotland There is an over/significant reliance on sites in the Urban Capacity Study for the Proposed Plan's demand and supply calculations, particularly as this is just an estimate of supply which has not been validated in terms of Circular 2/2010 (<i>this should be Planning Advice Note 2/2010</i>) and therefore is not a sound basis for meeting the land requirements for the next twenty years.</p> <p>E24 Banks Group Considers the use of an Urban Capacity Study, which contains confidential sites, to be unsatisfactory.</p> <p>E49/4 Jackton & Thorntonhall Community Council Understatement of planned completions of over 16,000 units has arisen because the Urban Capacity Study was based on an early version of the Housing Land Audit, whereas the Housing Land Audit data is based on a final or later version.</p> <p>It appears that capacity that was removed from the effective supply between the Housing Land Audit version on which the Urban Capacity Study was based and the final version was not then added to the Urban Capacity Study and has simply been disregarded.</p> <p>As a consequence of this understatement of potential private sector housing supply, the surpluses identified in all three stages of Schedules 8 and 9 on pages 44 and 45 respectively are also understated.</p>		

This understatement has the effect of masking the fact that Community Growth Areas are no longer required to meet a potential shortfall in demand since removing the capacity represented by these (19,500 units) would still leave a generous surplus of 7,500 units at 2025.

Modifications sought by those submitting representations:

E9 Wallace Land/E10 CALA Homes/Taylor Wimpey UK Ltd/E12 CEMEX UK Ltd/E14/1 Land Synergy/E15/2 Bellisle Developments Ltd/E52/13 Mactaggart and Mickel (Homes) Ltd/E55/4 Homes for Scotland

Reliance on Urban Capacity Study does not serve to deliver a 'generous supply for a range of housing'.

E49/4 Jackton & Thorntonhall Community Council

Amend the Urban Capacity Study to include all non-effective and part-effective sites from the final version of the Housing Land Audit except Community Growth Area capacity which should be removed in its entirety and make consequential changes to Schedule 6 on page 43 and Schedules 8 and 9 on pages 44 and 45.

Remove the reference to Community Growth Areas in subsection 4.75 on page 42.

Summary of responses (including reasons) by planning authority:

General

It is important to note that many of the housing issues are inter-related and other aspects of the responses will be dealt with more fully in other Schedule 4's, notably Issues 17 - 27: The relationship between the housing issues is detailed in 'Housing Land A Strategic Overview'.

E9 Wallace Land/E10 CALA Homes/Taylor Wimpey UK Ltd/E12 CEMEX UK Ltd/E14/1 Land Synergy/E15/2 Bellisle Developments Ltd/E52/13 Mactaggart and Mickel (Homes) Ltd/E55/4 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications on the grounds that it

- considers the Urban Capacity Study to be an appropriate approach, encouraged by Scottish Planning Policy paragraph 81 (Supporting Document 1), as part of the development of its Spatial Vision and Spatial Development Strategy which seeks to deliver development towards the re-use of sites, particularly brownfield sites, within existing settlements.
- The methodology for the Urban Capacity Study 2009 was the subject of consultation upon prior to commencement of the study (Glasgow and the Clyde Valley Strategic Development Planning Authority, 'Urban Capacity Study Issues Report 2009') (Supporting Document 2) and the outcomes detailed in Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, June 2011, Background Report 13 'Urban Capacity Study 2009' (Supporting Document 3).
- In terms of Planning Advice Note 2/2010, it relates only to determining the 'effectiveness' of sites i.e. sites capable of being built within a 7 year period. The test of 'effectiveness' is not intended to be applied beyond that timescale, whereas the Urban Capacity Study looks at potential programming up to 2033, based upon the local authorities adopting a consistent approach, itself based upon agreed guidance (Supporting Document 3, Annex 1).

- Equally the Urban Capacity Study was undertaken in the context of depressed market conditions, and local authorities took a measured view of the rate of recovery in the housebuilding industry.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority therefore considers the application of the 'effectiveness' test to be inappropriate in the context of an Urban Capacity Study.

E24 Banks Group

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this modification.

- When planning authorities are looking at the potential of urban areas for new housing sites, in this case up to year 2033, there will inevitably be featured sites whose long-term future, at this juncture, is deemed to be confidential in nature e.g. operational schools, industrial and commercial premises.
- However, the level of capacity from confidential sites for the 2009 Urban Capacity Study (Supporting Document 3) is considered to be relatively small - some 12.9% compared to 29.1% in the 2004 Urban Capacity Study undertaken for the Glasgow and the Clyde Valley Joint Structure Plan 2006 (Technical Report TR 5/06 'Urban Capacity Study 2004') (Supporting Document 4).

E49/4 Jackton & Thorntonhall Community Council

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this modification.

- The 16,000 units claimed omission is based upon the Community Council's assessment of figures using the finalised 2009 Housing Land Audit position. The Urban Capacity Study 2009 (Supporting Document 3) is based upon the draft 2009 Housing Land Audit position; therefore the figures are not capable of direct comparison.
- This situation is due to the time taken to finalise the Housing Land Audit 2009 position with Homes for Scotland. As a result, the Glasgow and the Clyde Valley Strategic Development Planning Authority considers the figure of 16,000 units to be misleading as the finalised Housing Land Audit figures were the basis for the figures contained in the Clyde Valley Strategic Development Planning Authority Background Report 13, Urban Capacity Study 2009 (Supporting Document 3).
- Notwithstanding, the Glasgow and the Clyde Valley Strategic Development Planning Authority has undertaken a similar exercise to that undertaken by the Community Council and estimate that the resultant figure to be significantly lower, in the region of 3,400 units (amounting to 3.2% of the total urban capacity figure), but again would seek to stress that the figures used in the Urban Capacity Study are based on the draft 2009 Housing Land Audit position.

Reporter's conclusions:

1. The use of urban capacity studies is supported by Scottish Planning Policy as a means of informing settlement strategies in development plans. Here, each of the eight local authorities has undertaken a search to identify potential housing sites, in addition to those confirmed in the housing land audits, which could contribute to meeting private sector housing requirements for the periods to 2020 and from 2020 to 2025. The resulting aggregate information and analysis is reflected in Schedules 8 and 9, by housing market area.

2. The assessment shown in these schedules does provide a significant degree of re-assurance regarding the scale of the land supply which is potentially available. However, the detailed information and assessments for each site upon which the urban capacity study is based have not been published for public scrutiny regarding location, size, possible tenure mix, potential constraints or programming. Homes for Scotland had no active part in preparing the study, the results have not been validated, and over 12% of the sites are still to be treated as confidential.

3. In these circumstances, the strategic development plan should clarify that the comparison of private sector supply and demand set out in Schedules 8 and 9 is preliminary and indicative. It should also confirm that it will be the responsibility of the local development plans to demonstrate that any sites proposed to be allocated will be effective, or are capable of becoming effective, within the relevant plan period. That process will include the community growth areas, and will enable the existence and scale of any surplus in the housing land supply to be confirmed and addressed through the local development plans, having regard to likely market conditions over the longer term and to the need to provide land for house building for the affordable sector too.

Reporter's recommendations:

The modifications to the plan arising from the conclusions reached on Issues 17, 19 to 23, and 27 are set out in the Annex which follows Issue 27.

Issue 22	All Tenure Housing Requirement	
Development plan reference:	Spatial Development Strategy Spatial Framework 3 Sustainable Communities Housing	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E6 Quarriers E8 Taylor Wimpey Ltd. E9 Wallace Land E10 CALA Homes/ Taylor Wimpey UK Ltd E12 CEMEX UK Ltd. E24 Banks Group E31 Caledonian Properties E42/3 Lynch Homes E42/4 Lynch Homes E42/5 Lynch Homes E45/3 CALA Homes (West) E45/4 CALA Homes (West) E45/5 CALA Homes (West) E51/1 Scottish Government (Directorate for the Built Environment) E52/14 Mactaggart and Mickel (Homes) Ltd. E55/4 Homes for Scotland</p>		
Provision of the development plan to which the issue relates:	Paragraphs 4.64 to 4.89 (pages 40 to 49) Schedules 6 to 11 (pages 43 to 48)	
Planning authority's summary of the representation(s):		
<p>The main issue is that the Proposed Plan has not dealt satisfactorily with an all tenure housing requirement and specifically that the identified need for affordable housing (which it is argued should be more closely integrated with demand for private housing) has not been translated into allocations for additional housing land.</p> <p>E6 Quarriers This representation is concerned that there are not options for the delivery of new land for private housing outside the context of brownfield regeneration opportunities. It raises five main points:</p> <ul style="list-style-type: none"> • no apparent comprehensive assessment of the deliverability of existing supply; • a singular reliance on brownfield development; • theoretical oversupply of market housing; • backlog in affordable housing provision; • need to deliver land for affordable housing and the role that private housing plays enabling that development. <p>E8 Taylor Wimpey Ltd. Urgent need for affordable and intermediate housing requiring private housebuilding to either provide or cross-subsidise provision. A shortfall of 85,000 affordable units is identified in the Plan with no vision as to how it will be delivered.</p>		

E8 Taylor Wimpey Ltd., E9 Wallace Land, E10 CALA Homes/Taylor Wimpey UK Ltd

The Strategic Development Plan strategy does not appear to provide a framework for addressing affordable housing needs, and this is particularly pertinent in areas such as East Renfrewshire where there is a recognised shortfall of land for affordable housing.

E12 CEMEX UK

The private and affordable sector housing should be considered together; it is inappropriate to divorce consideration of affordable housing from the private sector. This approach ignores both the valuable contribution that the private sector can make to the delivery of affordable housing and the importance of mixed tenure development in creating and maintaining successful communities. The two sectors are inherently interdependent with reliance on private sector delivery of affordable housing likely to increase during the life of the Strategic Development Plan due to the anticipated reduction in public sector subsidy.

E24 Banks Group

There is no evidence of generous housing land supply in the Proposed Plan. As appears to be the case for affordable housing requirements there should be much more flexibility given to Local Development Plans to deal with this issue. There should be a consistent approach between these two elements in order that it can be dealt with in an integrated manner.

E31 Caledonian Properties

Considers that the Glasgow and the Clyde Valley Strategic Development Planning Authority should combine the two affordability assumptions and release additional land for housing (paragraph 4.67).

E42/3 Lynch Homes, E45/3 CALA Homes (West)

There is no requirement in Scottish Planning Policy to plan specifically for the tenure based approach adopted in the Proposed Plan which adds complexity without any benefits for the public or stakeholders. The Proposed Plan should have addressed the future requirement for private demand and affordable housing needs, and simply aggregated these components to assess an overall strategic housing requirement as supported by the guidance set out in the Housing Need and Demand Assessment methodology by Scottish Government. The methodology adopted in the Proposed Plan is flawed and does not provide a sound basis to assess the overall level of the strategic housing requirement over the plan period.

E42/4 Lynch Homes, E45/4 CALA Homes (West)

Rather than subdividing the Housing Need and Demand Assessment demographic scenario into ill defined housing tenures for planning purposes, a replacement Schedule 6 is required showing its components and the assessment of the total housing requirement.

E42/5 Lynch Homes, E45/5 CALA Homes (West)

The Proposed Plan's consideration of affordable housing is not considered to be in accord with the policy requirements set in paragraphs 86 to 88 of Scottish Planning Policy. There is no requirement to separately identify the scale of affordable housing to be met in each local authority area. This should be part of the overall strategic housing target to be assessed from the Housing Need and Demand Assessment. The commentary set out in the text about the affordable housing sector is confusing and as there is no strategic direction in the Spatial Development Strategy it therefore does not provide any clear direction to the Local Development Plans.

E51/1 Scottish Government (Directorate for the Built Environment)

Scottish Planning Policy paragraphs 66, 70, 72, and 86 require the planning system to allocate a generous supply of land to meet identified housing requirements across all tenures. The Scottish Government (Directorate for the Built Environment) considers that evidence exists in the Housing Need and Demand Assessment on which to base an overall housing requirement figure across all tenures, and that this should have been the starting point for the consideration of housing land supply issues in the plan and therefore do not agree with the conclusion at Paragraph 4.85 of the Proposed Plan that the Strategic Development Plan should not identify a land supply for the affordable sector. The analysis of affordable housing needs that is included in the Strategic Development Plan demonstrates that this sector could produce significant demands for land use change.

E52/14 Mactaggart and Mickel (Homes) Ltd.

To identify an affordable housing shortfall of 85,000 units but fail to provide any strategic direction on the manner in which this need is to be met represents an abdication of responsibility by the Strategic Development Plan. To indicate that it is up to each Local Development Plan to detail the manner in which this known need is to be met fails to address the strategic requirement identified. Indeed the Glasgow and Clyde Valley approach runs contrary to the National Planning Framework for Scotland 2 Paragraph 75.

It is considered that for the Council areas where there is an affordable housing shortfall that a Strategy Support Measure is required, compelling each local authority to meet their identified requirement. It is considered that by allocating sufficient effective housing land that the private sector could assist in addressing the affordable housing shortfall both geographically and over the Glasgow and the Clyde Valley Strategic Development Plan period. This is particularly important where available funding for registered social landlords has been dramatically reduced. Other mechanisms including enabling private development/shared equity etc. also needs to be considered. These comments are equally applicable to the 22,000 intermediate houses required over the Plan period.

E55/4 Homes for Scotland

Scottish Planning Policy and the Government's guidance on Housing Need and Demand Assessments are both clear that housing in development plans is to be considered across all tenures, and land allocated to reflect the totality of needs and demands. The fact that affordable housing needs are assessed by Council area makes it entirely reasonable to combine consideration with the assessment of private demand by Council area.

Schedule 10 contains an assessment of affordable needs by Council area. The Proposed Plan notes correctly in paragraph 4.80 that these figures cannot be taken directly as requirements for new build housing, as other approaches will play a part too. Paragraph 4.84 then seeks to avoid any further consideration of land requirements by arguing that the flexibility built into the Plan will cover any land requirements. However, this flexibility is based on at least two false assumptions, and is never quantified to allow verification that it is sufficient to meet needs as well as provide a generous land supply. In addition, there are variations by Council area in the assumed land supply to meet affordable housing needs.

Paragraph 4.86 then states that it is the role of Local Authorities to "determine their respective housing supply targets and associated housing land requirements through their respective Local Housing Strategies and Local Development Plans." While this is correct in terms of Scottish Planning Policy, it does conflict with the Strategic Plan, which is quite clear that:

- it has identified private housing requirements
- there is enough housing land to meet these requirements

- there is enough flexibility built into the projections and land supply to cover any affordable housing land issues
- Local Development Plans should therefore not identify further land.

Which is the correct position for local authorities to adopt? Do they accept the Strategic Plan’s clear instruction not to allocate further housing land? Do they use their Local Housing Strategy and Local Development Plan to assess their own requirement? If the latter, do they then rely on Diagram 4 to justify setting their own housing targets and land requirements?

Modifications sought by those submitting representations:

E6 Quarriers; E8 Taylor Wimpey; E9 Wallace Land; E10 CALA Homes/Taylor Wimpey UK Ltd; E12 CEMEX Ltd.; E24 Banks Group; E31 Caledonian Properties

No specific modifications sought.

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land and Issue 20 Generous Land Supply.

E42/3 Lynch Homes; E45/3 CALA Homes (West)

- Modify the wording in para 4.66
- Delete reference to para 4.68
- Delete reference to paras 4.73, 4.74, 4.75 and 4.76 to exclude all references in the Proposed Plan to Private Sector Housing
- Substitute map showing local authority areas as the Housing Market Areas in Diagram 17
- Replace Schedule 6 into para 4.66

Schedule 6 (amended): Housing Requirements

Local Authority	Housing Requirement to Meet Housing Need & Market Demand						
	7 Year 2013-20			12 Year 2013-2025			Annual Requirement
	Market	Affordable	Total	Market	Affordable	Total	
East Dunbartonshire	1,718	3,650	5,368	2,118	4,850	6,968	581
East Renfrewshire	1,400	1,750	3,150	1,700	1,950	3,650	304
Glasgow City	16,164	26,850	43,014	26,164	36,750	62,914	5,243
Inverclyde	891	2,175	3,066	991	2,275	3,266	272
North Lanarkshire	9,673	0	9,673	16,073	0	16,073	1,339
Renfrewshire	5,282	363	5,644	7,982	363	8,344	695
South Lanarkshire	10,055	7,675	17,730	12,555	8,975	21,530	1,794
West Dunbartonshire	1,782	0	1,782	2,982	0	2,982	248
GCV total	46,964	42,463	89,426	70,564	55,163	125,726	10,477
Note: Based on Planning Scenario/High Affordability including lower estimate of Backlog of Need							

E42/4 Lynch Homes, E45/4 CALA Homes (West)

These representations propose the following modifications:

- 4.70 delete from the first sentence “..the private sector”
- 4.71 (duplicate modification to E47/2 & E45/2 above)
- 4.72 delete from the second sentence “Considerable...” and replace with “However,

- 4.72 add at the end of the paragraph:
 “As required by Scottish Planning Policy, Schedule 7 details the scale of land release to be allocated in the Local Development Plans to Year 7. Local Development Plans are advised to adopt the annualised estimate of the strategic housing requirement to assess the housing shortfalls and allocations needed over the 10 year plan period.
 “Local Development Plans should through the Local Housing Strategy adopt the findings from the Housing Need and Demand Assessment to assess Local Housing Needs and any affordable housing shortfall. If a shortfall is identified then an affordable housing policy is appropriate.
 “Local Development Plans can allocate land for affordable homes to help deliver the Strategic Development Strategy.”
- 4.77 delete paragraph and replace with
 “Having determined the strategic housing requirement for each local authority area, Schedule 7 (amended) details the scale of housing allocations to be met by site allocations to year 7 as required by Scottish Planning Policy. This is based on the effective land supply in the latest Housing Land Audit (2010). Windfall sites are not included in this land supply assessment. The land identified in the Urban Capacity Study has not been agreed effective and therefore cannot be included in this land supply. Land which is part of the Urban Capacity Study can be allocated in the Local Development Plans if it can be demonstrated that these are effective in the relevant plan period.”
- Delete Schedules 7, 8 and 9 and replace with new Schedule 7 before paragraph 4.77.

Schedule 7: Housing Shortfalls to Year 7

Local Authority	Housing Shortfalls to Year 7		
	Annualised Housing Requirement to Year 7 (i)	Effective Housing Supply (ii)	Housing Shortfall
East Dunbartonshire	4,065	1,110	2,955
East Renfrewshire	2,129	1,329	800
Glasgow City	36,700	18,024	18,676
Inverclyde	1,905	2,171	0
North Lanarkshire	9,376	6,515	2,861
Renfrewshire	4,868	4,311	557
South Lanarkshire	12,559	9,728	2,831
West Dunbartonshire	1,739	1,968	0
GCV total	73,340	45,156	28,679

**Source: (i) Strategic Housing Requirement (Schedule 6)
(ii) Assessed from 2010 Housing Land Audits as approved (2009 HLA for East Dunbartonshire)**

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land).

E42/5 Lynch Homes, E45/5 CALA Homes (West)

Delete Paras 4.79 to 4.86 along with Schedules 10 and 11

The target for affordable housing is still retained in the Proposal Plan. This is now part of an amended Schedule 6 (see **E42/3 Lynch Homes**) which brings together the assessment of market demand and affordable housing needs in a consolidated table as required by SDP.

E51/1 Scottish Government (Directorate for the Built Environment)

We suggest that the Reporter invites the Glasgow and the Clyde Valley Strategic Development Planning Authority to revisit its housing requirement to 2025 to take account of all tenures. In doing so the outputs of the Housing Need and Demand Assessment should be the starting point, but other factors including realistic prospects for the housebuilding industry, for growth, and for the availability of public subsidy to support affordable housing may also be taken into account. The Glasgow and the Clyde Valley Strategic Development Planning Authority should then be invited to identify a housing land requirement more than sufficient to accommodate this target (i.e. incorporating a generosity allowance), and taking account of a realistic assessment of the proportion of the established supply likely to become effective by 2025.

If the Reporter concludes from this exercise that the Proposed Plan does not deliver a generous supply of housing land, then we suggest that Schedule 9 of the Plan is reworked to identify the shortfall in each sub-market area (and including a distribution of mobile demand) and a requirement included in the Plan for the eight planning authorities to allocate land to meet these shortfalls through their Local Development Plans.

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land and Issue 20 Generous Land Supply).

E52/14 Mactaggart and Mickel (Homes) Ltd.

A Strategy Support Measure to meet the affordable and intermediate housing requirement in full, both geographically and over the Glasgow and Clyde Valley Strategic Development Plan period.

E55/4 Homes for Scotland

- Paragraph 4.84 delete first two sentences and replace with: “The intermediate sector potentially is part of the wider approach to meeting affordable housing needs. Local authorities will assess the overall scale of housing land required to meet all needs, but should note that some households who can access intermediate housing may be more mobile than those in the social-rented sector. Some flexibility in land allocations may be needed to reflect this.”
- Paragraph 4.86, add a new second sentence: “Local Authorities will consider the total housing land required for all tenures.”

(Related aspects are dealt with in Issue 17 Effectiveness and Additional Housing Land and Issue 20 Generous Land Supply).

Summary of responses (including reasons) by planning authority:**General**

- The main issue raised by the representations is that the Proposed Plan has not dealt satisfactorily with an all tenure housing requirement and specifically that the identified need for affordable housing has not been translated into allocations for additional housing land.
- Many of the housing issues are inter-related and other aspects of the responses will be dealt with more fully in other Schedule 4's, notably Issues 17 - 27 and in a more integrated fashion in the paper 'Housing Land - A Strategic Overview'.
- Housing Need and Demand Assessment, the method to calculate housing requirements, is a new methodology.
- The Glasgow and the Clyde Valley Housing Need and Demand Assessment has been declared 'robust and credible' in a letter from the Scottish Government's

Centre for Housing Market Analysis dated June 2011 (Supporting Document 1). The Scottish Government's Housing Need and Demand Assessment Guidance Page 7 (Supporting Document 2) explains that where a Housing Need and Demand Assessment is 'robust and credible' its approach will not be considered at examination. Instead the examination will focus on the proposed spatial policies for housing set out in the Proposed Plan and their relationship with the findings of the Housing Need and Demand Assessment.

- However, a number of methodological issues and gaps were identified in the guidance (detailed in the Housing Need and Demand Assessment, 2011, Paragraph 1.47, Page 17 and Technical Appendix 6, Section 2 (Supporting Document 3) and its Technical Appendix 6, Section 2 (Supporting Document 4). Methodological solutions were agreed and developed by the eight Glasgow and Clyde Valley local authorities through their Housing Market Partnership to fill these gaps.
- The Housing Need and Demand Assessment, although looking to 2025, will be reviewed in five years (2016) alongside the Proposed Plan.
- Responses are structured into the four sub-issues which recur in the various representations, before addressing the specific modifications proposed.
 1. the Proposed Plan should identify an all-tenure overall strategic housing requirement
 2. 85,000 has been identified as the estimated shortfall of affordable housing units 2008-2025
 3. the Delivery Framework
 4. recognition of the contribution which the private sector can make to meeting affordable housing

Sub-issues

1) The Proposed Plan should identify an all-tenure overall strategic housing requirement

E31 Caledonian Properties; E42/3, E42/4, E42/5 Lynch Homes, E45/3, E45/4, E45/5 CALA Homes (West), E51/1 Scottish Government (Directorate for the Built Environment)

Consider that Scottish Planning Policy 2010 requires the Proposed Plan to identify an all-tenure housing requirement.

E42/3, E42/4, E42/5 Lynch Homes, E45/3, E45/4, E45/5 CALA Homes (West)

Consider that the figures for the private and affordable sectors should therefore be aggregated for land supply purposes. These two respondents have re-calculated figures and offered alternative Schedules to conclude that there is a requirement for substantial additional land release.

- As has been mentioned in the introduction, there are a number of methodological issues and gaps in the Housing Need and Demand Assessment Guidance which have meant that the Housing Market Partnership has had to develop a methodology to overcome these gaps and produce a 'robust and credible' assessment of housing need and demand.
- This includes developing a robust methodology for both the affordable and market sectors, outlined in summary in the Proposed Plan paragraphs 4.66 - 4.69 and in more detail in the Housing Need and Demand Assessment, 2011, Page 17, paragraph 1.47 (Supporting Document 3) and Technical Appendix 6, Section 2 (Supporting Document 4).

- Two of the most critical gaps relate to the contention that the Proposed Plan has not identified an all-tenure housing requirement.
- Firstly:
 - The Guidance focuses on a housing needs assessment approach as undertaken traditionally for the affordable social rented sector in preparation of Local Housing Strategies.
 - That housing needs assessment approach cannot be applied to the private sector, as the private sector operates in a different way to the social rented sector.
 - In addition, private and affordable sectors operate within different housing market areas (see Housing Need and Demand Assessment, 2011, Pages 26-29, paragraphs 2.21-2.31 (Supporting Document 5) and its Technical Appendix TA01 'A Housing Market Area Framework') (Supporting Document 6).
- Therefore, it has been necessary to apply different methodologies to assess affordable housing needs and private sector requirements. The two methodologies are not exclusive resulting in demand requirements being identified for the private sector and the assessment of need being presented for the affordable sector which will then be considered through the Local Housing Strategy process.
- Section 10 of Housing Need and Demand Assessment Technical Appendix 6 'Review of Supply and Demand/Need for Housing' sets out the issues arising from the use of different methodologies; specifically paragraphs 10.6 and 10.7 which state:
 - *"10.6 .. the methodologies for both sectors are not consistent ..*
 - *"Private sector is based on the planning scenario (C2) High affordability Private Rented Sector*
 - *Affordable sector is based on the planning scenario (C2) Low affordability Private Rented Sector*
 - *When totalled by tenure ..demand .. and ..need exceeds the overall number of households from the household projections by 26,000. This is because there is an overlap of households in high and low affordability scenarios.*
 - *Backlog Need, on advice from the Centre of Housing Market Analysis, has been added in addition to the household projections i.e. there are 72,000 households accounted for in addition to the .. household projections. Of these 6,000 are estimated to be able to meet their needs in the private market and have been added to the private sector supply/demand comparison.*
 - *It is possible that there is the potential for double counting between elements of backlog need and the household projections; however, it is unlikely that the level of double counting can be quantified (ref 4.4).*
 - *10.7 The consequence .. is that the all tenure summary has to be approached with caution and cannot be considered without understanding the inconsistencies in the models used for the private and affordable sectors. Furthermore, it would be inappropriate to directly translate affordable housing requirements into new build housing requirements. Local authorities, through their Local Housing Strategies, will derive housing supply targets for the affordable sector taking into account new*

housing supply, replacement housing, empty properties to be brought back into use and conversions.”

- The **Scottish Government (Directorate for the Built Environment) (E51/1)** has stated that it believes the evidence, albeit that it does not present that evidence, exists in the Housing Need and Demand Assessment to present an all tenure housing requirement. However, the Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this position for the reasons stated above. A **consistent** all-tenure view is, at this stage, not possible.
- Secondly:
- Scottish Government Guidance has failed to align the process of setting out Housing Supply Targets in a Strategic Development Plan area (see sub-issue 3 for more detail).
- In a unitary authority, a Housing Need and Demand Assessment would be prepared followed by a Local Housing Strategy setting out Housing Supply Targets which would translate into housing land requirements in the Local Development Plan.
- In a Strategic Development Plan area, the housing requirements for the Private sector are set out in the Strategic Development Plan Proposed Plan. However, for the Affordable sector, the outputs of the Housing Need and Demand Assessment require to be assessed through an additional stage in the Local Housing Strategy. The assessment of housing requirements for this sector is not a simple supply-demand land allocation issue but requires more detailed and concerted understanding of a range of factors, including management and letting policies for the existing stock, stock conditions and renewal policies, e.g. void and vacancy levels, and the use of empty properties and conversion/sub-division of dwellings (see sub-issue 2 for more detail).
- The Local Housing Strategy, after this assessment, will then set out the Housing Supply Targets to be translated into land requirements in the Local Development Plan. Therefore, the Glasgow and the Clyde Valley Strategic Development Planning Authority considers it is inappropriate for the Proposed Plan to set out housing requirements for the affordable sector and as such setting the Housing Supply Targets has been deferred to Local Housing Strategies which translate into housing land requirements in a Local Development Plan.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority acknowledges the expectation in Scottish Planning Policy that the Strategic Development Plan should include an all-tenure housing requirement. However, as set out above, policy is also clear that such a housing requirement should be based on Housing Supply Targets, derived by local authorities in their Local Housing Strategies. While the Housing Need and Demand Assessment provides a key piece of evidence in deriving Housing Supply Targets, a number of other factors should also be taken into account for the affordable sector, as recognised by Scottish Government.
- The Strategic Development Planning Authority is satisfied that the approach taken is appropriate and pragmatic, and therefore rejects the representations.

2) 85,000 has been identified as the estimated shortfall of affordable housing units 2008-2025

E8 Taylor Wimpey Ltd, E52/14 Mactaggart and Mickel (Homes) Ltd.

These representations point to the shortfall of affordable housing units, estimated at 85,000 over the period 2008-25 (Schedule 10, Page 47 of the Proposed Plan), and presume that this figure should be taken as the affordable housing supply target, and that consideration should be given to allocation of housing land to meet this figure in full.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this argument on the following grounds:

- As the Proposed Plan makes clear (paragraph 4.80, page 46) “this housing need does not directly translate into a new house building requirement for affordable housing”. Need may be met by other means, including conversion, subdivision and the use of empty properties, or by use of other policy interventions such as adaptations or the management of lettings. New affordable housing will depend also significantly upon available resources, particularly public subsidy funding sources, which are likely to be severely constrained, at least in the initial phase of the Strategic Development Plan.
- The problem which may arise in a number of local authorities, is also highlighted, where the figures shown for the whole local authority mask variations (shortfall or surplus) at sub-area level.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority’s stance is drawn directly from caveats noted in the Housing Need and Demand Assessment in Chapter 5, paragraphs 5.29 and 5.46 (Supporting Document 7). This reflects a caveat in the Scottish Government’s own Housing Need and Demand Assessment Guidance (2008, Page 7, paragraph 1) (Supporting Document 2). It is also implicit in the Scottish Government’s Local Housing Strategy Guidance 2008, Page 16, paragraphs 43 to 45 (Supporting Document 8) that the Housing Need and Demand Assessment is an important part of the evidence base, but that other evidence may also be considered in deciding how best to meet need and demand, and defining Housing Supply Targets.
- Scottish Planning Policy, 2010, paragraph 70 (Supporting Document 9) acknowledges that “wider strategic economic, social and environmental policy objectives should also be taken into account when determining the scale and distribution of the housing requirement and the housing supply target for an area”.
- The Scottish Government’s Centre for Housing Market Analysis is undertaking a stock-taking and review of the Housing Need and Demand Assessment process, based on the recent experience of authorities, with a view to refreshing the Guidance. One of the key issues identified by stakeholders relates to anomalous high or low figures compared to historical levels. It is considered legitimate for Housing Supply Targets to be lower (or higher) than Housing Need and Demand Assessment results, based on sound evidence (Presentation extracted from CHMA website, October 2011, slides 2 and 4) (Supporting Document 10).
- The representation by **Mactaggart and Mickel (Homes) Ltd. (E52/14)** proposes that the 22,000 figure identified for intermediate housing in Schedule 11, Page 48 of the Proposed Plan, should similarly be provided for in full.
- The Strategic Development Planning Authority considers this approach to be incorrect and would result in double counting.

- As the Schedule and accompanying text in Paragraphs 4.83 and 4.84 make clear, the figure of 22,000 for intermediate housing has been calculated for the purposes of the Proposed Plan as a 'potential' sector.
- The actual requirement would be dependent on factors such as availability of public subsidy and prospective households' access to affordable finance, as well as the continuing uncertainty over likely levels of demand for intermediate products and a range of constraints affecting future supply. Intermediate housing is expressed as a subset of Affordable Housing, i.e. the total Affordable Sector figure of 85,000 comprises both social rented housing and intermediate housing; a maximum potential intermediate housing component of 22,000 implies a correspondingly reduced social rented component of 63,000.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this modification and considers it would be unrealistic and potentially detrimental to its Spatial Vision and Spatial Development Strategy to make allocation for 85,000 affordable homes – a figure which is highly sensitive to methodological changes and which requires more substantive local analysis through the Local Housing Strategy process.
- A sustainable approach requires maximum return from the existing affordable housing resource before adoption of new-build as a solution.

3) Delivery Framework

E6 Quarriers; E8 Taylor Wimpey Ltd.; E9 Wallace Land; CALA Homes/ Taylor Wimpey UK Ltd; E42/5 Lynch Homes; E45/5 CALA Homes (West); E51/1 Scottish Government (Directorate for the Built Environment); E52/14 Mactaggart and Mickel (Homes) Ltd.; E55/4 Homes for Scotland.

These representations consider that the Proposed Plan does not provide a satisfactory strategic framework to address affordable housing needs, and should identify resulting land allocations. The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this argument on the following grounds:

- the approach adopted in the Proposed Plan is consistent with Housing and Planning policy and guidance. The Proposed Plan, together with the Housing Need and Demand Assessment, provides evidence relating to likely future requirements for social rented housing, and the potential for intermediate housing to contribute to this need.
- The Proposed Plan and associated publications also recognise significant limitations which can only be resolved at local level. The Proposed Plan therefore provides an appropriate strategic context and framework for delivery of affordable housing through Local Housing Strategies and Local Development Plans.
- Local housing authorities have the responsibility for identifying Housing Supply Targets for all tenures (although it is important to note that private sector housing requirements are set out in the Proposed Plan as they are calculated within a Housing Market Area system outwith local authority boundaries) within their Local Housing Strategies, as laid down in the following,:
 - Housing (Scotland) Act 2001: Part 5 'Strategic Housing Functions', Section 89 Local Housing Strategies (Supporting Document 11).
 - Scottish Planning Policy (2010): Paragraphs 69 and 86 (Supporting Document 9).
 - Planning Advice Note 2/2010: Paragraphs 5, 6, 12, and Box 1 Step 5 (Supporting Document 12).

- Local Housing Strategy Guidance (2008): Paragraphs 1, 11, 17, 18, 19, 21, 43, 44, 55 (Supporting Document 8).
- Housing Need and Demand Assessment Guidance (2008): Chapter 1 'Housing Need and Demand Assessments', Introduction, paragraph 4, page 4 (Supporting Document 13).
- Housing Supply Targets are then to be used to allocate land for housing, in all tenures, in local development plans. There is a clear expectation in Scottish Planning Policy 2010 Paragraph 69, Planning Advice Note 2/2010, paragraphs 6, 12 and 13 and Box 1, and Local Housing Strategy Guidance, paragraphs 19, 21 and 33, that 'alignment' should occur between the processes of preparation of the Housing Need and Demand Assessment, the Local Housing Strategy and both Strategic and Local Development Plans.
- This is a challenging demand in a multi-authority strategic development planning area such as the Glasgow and Clyde Valley city-region where strategic housing requirements are to be set out in the Strategic Development Plan. Problems with alignment of strategies/plans were identified as another key issue by the Scottish Government in its Housing Need and Demand Assessment stock-taking exercise (Supporting Document 10).
- In preparing the Housing Need and Demand Assessment, a re-confirmed housing market framework was used in relation to private sector demand. Resultant private sector housing supply requirements therefore directly inform each Local Development Plan, in conjunction with the Housing Supply Targets in the corresponding Local Housing Strategy.
- A different methodology necessarily had to be adopted for the affordable housing sector, as specified in the Scottish Government's Housing Need and Demand Assessment Guidance, using a housing needs assessment approach. However, limitations have been identified in the affordable housing figures, and it was therefore considered inappropriate for these to be used in the Proposed Plan as affordable housing supply targets.
- The Proposed Plan therefore stipulates in paragraph 4.86, page 49 that local authorities, in conjunction with the Housing Market Partnership, should determine their respective Housing Supply Targets and associated housing land requirements. This is considered the most appropriate approach for the affordable sector in particular, as it will allow important additional factors to be taken into account in forming judgements about future local housing need and supply issues, including: knowledge of differences between local authority sub-areas, policy and investment priorities, understanding of local economic and social considerations, and evidence from local stakeholders.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority is satisfied that there is no inconsistency in this approach which has been ruled 'robust and credible' by the Scottish Government's own Centre for Housing Market Analysis. The Proposed Plan has assessed private sector requirements by housing market areas and concluded that there is a generous land supply to meet requirements.
- Paragraph 4.84, page 48, relates to the intermediate component, which, as noted above, is uncertain and assessed as a 'potential' sector only.
- Research into the Low Cost Initiative for First Time Buyers scheme, conducted for the Scottish Government and referred to in the Housing Need and Demand

Assessment (Chapter 5, paragraphs 5.37-5.41) (Supporting Document 7), suggested that the scheme, roughly equivalent to the Proposed Plan's intermediate housing, delivered only 2,095 properties across the city-region between 2005-06 and 2009-10.

- The Glasgow and the Clyde Valley Strategic Development Planning Authority acknowledges that elements of this sector could be delivered by the private sector. It is therefore reasonable for the Proposed Plan to provide the flexibility supported through Strategy Support Measure 10 if required by local authorities so as to ensure that an effective 5 year supply is maintained at all times.
- Paragraph 4.86, page 49, is clear that it devolves to each constituent local authority the responsibility, within the principles of the Proposed Plan, to identify their Housing Supply Target for affordable housing within their Local Housing Strategy, and to translate this into any additional land requirement for affordable housing in the Local Development Plan.

4) Recognition of the contribution the private sector can make to meeting affordable housing

E8 Taylor Wimpey Ltd., E12 CEMEX UK, E24 Banks Group, E52/14 Mactaggart and Mickel (Homes) Ltd.

These representations argue that the Proposed Plan does not pay sufficient attention to the contribution that private housing developers make to addressing affordable housing requirements, and that this may become more significant in future as public funding is severely constrained.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this modification and is satisfied that it has already recognised in an appropriate manner in the Strategic Development Plan Proposed Plan the role which the private housing sector plays in contributing to affordable housing particularly through the following:

- Proposed Plan Paragraph 4.88, page 49, specifically recognises the role of the private sector in meeting affordable housing requirements, especially low cost home ownership, through mechanisms such as quota-style policies, Supplementary Planning Guidance, or other more innovative public-private delivery mechanisms. This recognises Scottish Government initiatives such as the Scottish Housing Trust and the Homes Fit for the 21st Century: Strategy and Action Plan (2011).
- Proposed Plan paragraph 4.85, page 49 also notes the importance of availability of subsidy, which is uncertain, as well as development of financial products which are realistic and attainable by those in housing need.
- Scottish Planning Policy 2010, Paragraph 87 (Supporting Document 9) and Planning Advice Note 2/2010, Paragraph 17 (Supporting Document 12) are clear that provision of affordable housing may vary between local authority areas and that policies relating to developer contributions to such provision should take account of development viability, the vibrancy of the local housing market, and the availability of funding.

Response to specific modifications sought

E42/3, E42/4, E42/5 Lynch Homes, E45/3, E45/4, E45/5 CALA Homes (West),

The Glasgow and the Clyde Valley Strategic Development Planning Authority considers that its reasoning for devolving affordable sector figures to local authorities, through their Local Housing Strategies and Local Development Plans, to have been clearly set out.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications, including the alternative figures and revised Schedules.

- The Glasgow and the Clyde Valley Housing Need and Demand Assessment was declared 'robust and credible' in a letter from the Scottish Government's Centre for Housing Market Analysis in June 2011 (Supporting Document 1).
- An explanation to the approach adopted by the Glasgow and the Clyde Valley Strategic Development Planning Authority has been set out above.

E51/1 Scottish Government (Directorate for the Built Environment)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification.

- It is not clear how this modification would result in more satisfactory and robust housing delivery.
- The Housing Need and Demand Assessment, following the Scottish Government's Guidance, provided figures for private sector housing requirements and affordable sector requirements, using two different housing market frameworks and different methodologies. Agreement among the eight local authorities was achieved for the private sector supply and demand comparisons, and these figures are used in the Proposed Plan.
- However, the Proposed Plan recognises significant uncertainties relating to the figures for the affordable sector, and for that reason devolved to local authorities responsibility for setting affordable Housing Supply Targets and identifying any resulting additional land requirements through the Local Housing Strategy and Local Development Plan processes.
- Local authorities are in a better position to assess local factors which might influence affordable housing requirements, including the impact of various investment priorities and policies, likely availability of public subsidy for provision of social rented or intermediate housing, alternatives to new build, and differences between local authority sub areas.

E52/14 Mactaggart and Mickel (Homes) Ltd.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the need for an additional Strategic Support Measure relating to affordable and intermediate housing.

The Proposed Plan is already clear in its requirement for each of the eight Glasgow and Clyde Valley local authorities to identify their affordable housing supply target, including social rented and other intermediate products, along with their private housing supply target, in their Local Housing Strategy, and to meet the necessary housing land requirements through their Local Development Plans (Proposed Plan, paragraph 4.86, page 49). Scottish Planning Policy requires that there should be at least a five year effective and generous land supply.

E55/4 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.84 as it is considered unnecessary as the points mentioned are already covered by the Proposed Plan.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification to Paragraph 4.86 as it is considered the meaning is implicit in the first sentence, reflecting Local Housing Strategy Guidance and Scottish Planning Policy.

Reporter's conclusions:

1. Scottish Planning Policy states at paragraph 67 that: "Where the housing need and demand assessment is considered robust and credible by the Scottish Government, the approach used will not normally be considered at a development plan examination." However, a footnote to that statement also confirms that: "This policy does not override the provisions of Part 4 of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008."
2. Part 4 of these regulations sets out the statutory requirements to be followed in the examination of development plans, and regulation 21 defines the scope of the examination. It confirms that the examination of a strategic development plan is to assess issues raised in unresolved representations. It does not exclude the approach used in the housing need and demand assessment.
3. The regulations define 'unresolved representations' in respect of a proposed strategic development plan as being 'representations mentioned in section 12(1)(a) of the Act'. That part of the Act refers simply to timeously made representations to the strategic development plan which have not been taken account of in modifications and have not been withdrawn.
4. In these circumstances, for the purposes of the examination I consider that is not open to the reporter conducting it to fail to address an issue which is raised in unresolved representations and relates to the proposed plan, even in circumstances where the issue derives from the approach contained in a housing need and demand assessment which has been certified by the Scottish Government as robust and credible.

The omission of an all-tenure housing requirement

5. Scottish Planning Policy conveys a clear expectation that the strategic development plan will address the overall requirement for new housing land across the whole of its area, and not just for private sector house-building. In Glasgow and the Clyde Valley, where the strategic development plan explicitly adopts a higher migration population projection for the period to 2035, it is essential that the plan identifies the scale of additional land required to accommodate the extra houses that will be needed to accommodate that population, and not only those who will live in owner-occupied or private sector houses.
6. The scale and distribution of the population growth being pursued through the strategic development plan is important information not only for the providers of essential physical and social infrastructure, but also for the builders and developers who will be expected to deliver the houses and associated facilities, the communities which can expect to experience growing pressures and to accommodate new developments, and the businesses who will be expected to benefit from that growth and to provide the expanding population with goods, services and a range of appropriate employment opportunities.
7. I accept that difficulties have been encountered in assessing future housing needs and demands, and that there are inconsistencies between the methodologies used for deriving future housing land requirements for the private and affordable housing sectors. However, while acknowledging the potential areas of uncertainty, I consider that the strategic development plan should set out for each of the eight local authority areas, the best indication available of that requirement for the periods up to 2020, and from 2020 to 2025. That would be consistent with the role of strategic development plans across Scotland, as set out in Scottish Planning Policy.

8. The private sector housing requirements, both in total and for each local authority area in the relevant time periods, are already clearly set out in the plan in Schedules 6 and 7. They are not fundamentally disputed in themselves, and I accept that they indicate the scale of new private sector house-building which is likely to be required if the authority's choice of the high migration population projection is to be realised and its vision for growth in Glasgow and the Clyde Valley is to be achieved.

9. However, a larger land supply is always necessary to deliver a particular number of house completions, as has been confirmed in the recent Scottish Government research study referred to at Issue 17. Also, some of the sites will not be developed for private sector houses only, particularly where local authorities apply quota policies to ensure that a proportion, often 25%, of the houses built on those sites are in the affordable sector. The calculated surplus of 11,000 houses in the existing land supply for the period to 2025, as indicated in Schedules 6 and 9, may not be based on sound assumptions regarding the sites' likely effectiveness or accurate estimates of their likely capacity to deliver private sector houses. In these circumstances, confirmation of the ability of these sites to deliver the required housing completions will have to await the preparation of the relevant local development plans. (See also Issues 17 and 21.)

10. In Schedule 10, the plan already indicates the scale of the need for additional houses in the affordable sector in each local authority area, and for the same time periods as the private sector, albeit with a base date of 2008 rather than 2009. The authority has indicated a number of caveats regarding over- or under-estimates in the schedule's figures, and potential inconsistencies, including between authorities. However, in view of the plan's adoption of the higher migration population projection, and the scale of both the backlog and continuing needs for a range of affordable housing, I am satisfied that the inclusion in the plan of an amalgamated all-tenure housing requirement derived from the existing schedules is the appropriate and pragmatic response, albeit that a number of caveats would require to be attached in light of the acknowledged inconsistencies and uncertainties.

11. These caveats would enable individual planning authorities to vary the all-tenure requirement where, beyond the figures for required private sector housing completions, it can be shown that this is justified on the basis of further analysis. Much of this work will already have been undertaken for each authority's local housing strategy. However each local development plan requires to be consistent with the strategic development plan, and in these circumstances the basis for any variation should be foreshadowed in the strategic development plan and not be likely to undermine its overall strategy. Such variations could be demonstrated from further evidence and/or analysis in relation to:

- The scale of backlog need and the rate at which it can be met;
- The scale of identified need for affordable housing;
- The availability of public subsidy;
- The capacity of private developers to deliver various forms of affordable housing;
- Double-counting or under-counting arising from the use of inconsistent methodologies, including the use of different base dates (2008 and 2009);
- The extent to which housing needs can be met without building new houses;
- The application of quota policies to secure affordable housing on a proportion of a private sector site;
- The identification of insurmountable infrastructure constraints; or
- Agreement of an adjoining authority to meet some of the identified housing needs or demands.

12. While analysis of the Register of Sasines and housing choice surveys has enabled housing market areas to be identified which extend across local authority boundaries, this should not over-ride the need for clarity regarding the housing land requirements to be identified through the local development plans in each local authority's area. Without this, and with the exception of Inverclyde, West Dunbartonshire and the three housing sub market areas in North Lanarkshire, it would remain unclear as to how much land for housing requires to be allocated either in each local authority area or in each housing sub market area, and therefore in each local development plan. The identification of two higher tier housing market areas, while demonstrating mobility, has the effect of increasing that uncertainty.

13. In these circumstances, the failure to identify an all-tenure housing requirement for each local authority area and for both periods 2008 to 2020, and 2020 to 2025, would risk the successful delivery of the plan's strategy for Glasgow and the Clyde Valley to pursue the higher migration population projection upon which its vision is based.

The estimated shortfall of 85,000 affordable houses

14. In Schedule 10, the plan already identifies 85,000 as the estimated shortfall in affordable sector housing over the period up to 2025. It would have been desirable if further work had been undertaken to confirm the appropriate figures for each local authority area with greater confidence. However, subject to applying the caveats outlined above at paragraph 11, I consider that it is appropriate for the information in this schedule to be used in the strategic development plan to provide the indicative figures on which the combined housing land requirements, including the affordable sector, should be identified in each local development plan. That will ensure that any subsequent adjustments are demonstrated to be properly justified by further evidence and/or analysis.

15. There may be circumstances where specific sites should be allocated to a particular housing sector. However, with the application of quota policies for affordable housing contributions on private sites and the potential contribution by the private sector of a range of types of affordable housing, this is generally inappropriate. Seeking to do so for land for 22,000 'intermediate' houses may be counter-productive.

Delivery framework

16. Recognising the need for further analysis and judgements which cannot realistically be undertaken or reached through this examination, the amended approach outlined above will provide as practical a delivery framework as is possible for the strategic development plan. It will indicate the all-tenure housing requirement in total and in each local authority area for the key time periods up to 2020 and then to 2025, and which is to be identified through site allocations in the relevant local development plan. Any adjustments flowing from the identified caveats will require to be justified, but it will provide a more robust basis on which the strategic development plan can secure the delivery of the authority's long term vision for Glasgow and the Clyde Valley.

Private sector contribution to meeting affordable housing needs

17. The separate and inconsistent assessments made of private sector housing demand and affordable housing needs have resulted in the plan giving the impression of a false separation. The identification, albeit with caveats, of an all-tenure housing requirement should help to rectify that impression. It will also be important to recognise the potential role of the private sector in providing a range of affordable housing types, not just through the application of quota policies to otherwise wholly private developments.

18. It is important that the plan should also confirm, not only the contribution which can be made by the private sector to meeting affordable housing needs, but also that doing so may reduce the surplus of private housing completions estimated in Schedules 6 to 9, or even lead to a deficit. That will form part of the assessment of the deliverability of the housing land supply which will be necessary in preparing each of the local development plans.

Reporter's recommendations:

The modifications to the plan arising from the conclusions reached on Issues 17, 19 to 23, and 27 are set out in the Annex which follows Issue 27.

Issue 23	Definitions of Intermediate Housing and Affordable Housing	
Development plan reference:	Section 4 Spatial Development Strategy Spatial Framework 3 Sustainable Communities	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
E5/2 Mr Michael and Mr Roger Jones E42/3 Lynch Homes E45/3 CALA Homes (West) E46/3 Susan Barnes (Landowner) E50 Hometown Foundation		
Provision of the development plan to which the issue relates:	Paragraph 4.68 (page 40) Paragraphs 4.79 and 4.81 (page 46) Paragraph 4.83 (page 48) Paragraphs 4.87 and 4.88 (page 49)	
Planning authority’s summary of the representation(s):		
<p>These representations seek to extend the definitions of intermediate housing and/or of affordable housing used in the Proposed Plan. It is considered that wider definitions would offer more flexibility in terms of the varying models coming forward.</p> <p>E5/2 Mr Michael and Mr Roger Jones, E46/3 Susan Barnes (Landowner), E50 Hometown Foundation Specific additional wording is proposed in respect of the issue of affordable sector to reflect other alternative housing models.</p> <p>E42/3 Lynch Homes, E45/3 CALA Homes (West) These representations are similar, pointing out the differences between the definition of the Affordable Sector as used for the purposes of the Proposed Plan and as provided in Scottish Planning Policy.</p>		
Modifications sought by those submitting representations:		
<p>E5/2 Mr Michael and Mr Roger Jones</p> <ul style="list-style-type: none"> • seek the addition of the following wording to the end of paragraph 4.68 “..mid-market rental or alternative housing models within the affordability range between social and market rates.” • seek the addition of the following wording at the end of the first sentence in paragraph 4.79, after ‘low cost home ownership’: “...mid-market rental or alternative housing models within the affordability range between social and market rates.” <p>E46/3 Susan Barnes (Landowner)</p> <ul style="list-style-type: none"> • seeks the addition of the following words at the end of paragraph 4.68 “..or rental models based on private or cooperative approaches which may or may not require subsidy.” • seeks the insertion of the word “potential” in paragraph 4.83 second sentence, line 4, prior to ‘...dependence upon public subsidy..’ 		

E50 Hometown Foundation

- seeks an additional reference in paragraph 4.81 to recognise that any shortfall in the provision of affordable housing could be tackled by community owned and cooperative initiatives.
- seeks an additional reference in paragraph 4.87 to recognise that funding and delivery of housing could include cooperative and community owned initiatives.
- proposes additional wording at the end of paragraph 4.88 to include specific reference to examples of innovative mechanisms of funding and delivery: "...such as community owned development proposals and cooperative based initiatives for new housing and infrastructure projects of varying scales."

Summary of responses (including reasons) by planning authority:

It is important to note that many of the housing issues are inter-related and other aspects of the responses will be dealt with more fully in other Schedule 4's, notably Issues 17 - 27: The relationship between the housing issues is detailed in the Housing Land - A Strategic Overview paper.

E5/2 Mr Michael and Mr Roger Jones

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this modification as it considers paragraphs 4.68 and 4.79 to be appropriate in setting out the analytical approach used in the Housing Need and Demand Assessment and the Proposed Plan. It would therefore be incorrect and misleading to make either of the modifications sought.

E46/3 Susan Barnes (Landowner)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this modification as it considers paragraph 4.68 to be appropriate in setting out the analytical approach used in the Housing Need and Demand Assessment and the Proposed Plan. It would be incorrect and misleading to make the modification sought.

E46/3 Susan Barnes (Landowner)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this modification as it considers paragraph 4.83 to be appropriate in setting out the analytical approach used in the Housing Need and Demand Assessment and the Proposed Plan. The assessment of the potential intermediate sector is based on shared equity housing which requires an element of subsidy, normally public subsidy.

E50 Hometown Foundation

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this modification as it considers paragraphs 4.81 and 4.87 to be appropriate in setting out the analytical approach used in the Housing Need and Demand Assessment and the Proposed Plan. It would therefore be incorrect and misleading to make either of the modifications sought.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this modification as it considers paragraph 4.87 relates primarily to the interpretation of results from the Housing Need and Demand Assessment and to uncertainty in the current housing market; to introduce the modification would be inappropriate and could be misleading.

The Glasgow and the Clyde Valley Strategic Development Planning Authority acknowledges that community-owned or cooperative initiatives may be one of a range of innovative delivery mechanisms. It is considered that the current wording of paragraph 4.88 permits of a wide range of possible new delivery mechanisms potentially including community-owned or cooperative initiatives.

E42/3 Lynch Homes, E45/3 CALA Homes (West)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects this modification as it considers its approach to modelling the scale of the affordable sector, by defining it to include social rented and intermediate housing, to be appropriate.

- The Glasgow and the Clyde Valley Strategic Development Planning Authority acknowledges the broad definition of affordable housing in paragraph 86 of Scottish Planning Policy (Supporting Document 1) and as set out in more detail in paragraph 5 of Planning Advice Note 2/1010 'Affordable Housing and Housing Land Audits (Supporting Document 2).
- The Proposed Plan is based on the specific definition of housing tenures adopted for modelling purposes in the Housing Need and Demand Assessment, namely:
 - Private sector (owner occupied and private rented housing) and
 - Affordable sector (social rented and intermediate housing).
- Affordable housing, as set out in Scottish Planning Policy paragraph 86, is stated to include social rented accommodation, mid-market rented housing, shared ownership, shared equity, discounted low cost housing for sale and low cost housing without subsidy. Nothing in the Proposed Plan is intended to challenge this statutory definition.
- However, in seeking better to understand this aspect of the housing system, the Glasgow and Clyde Valley Housing Need and Demand Assessment attempted to quantify the newer, emerging 'intermediate' component of the affordable sector.
- Given limited data availability for most of the specified types of affordable housing except social rented, a narrower definition was adopted for modelling purposes based on the characteristics of shared equity housing (set out in the Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, June 2011, Background Report 12 'Housing Need and Demand Assessment', page 113, paragraphs 5.31 and 5.32) (Supporting Document 3).
- This approach taken through the Housing Need and Demand Assessment has been declared 'robust and credible' in a letter from the Scottish Government's Centre for Housing Market Analysis in June 2011 (Supporting Document 4).
- The Scottish Government's Housing Need and Demand Assessment Guidance 2008 explains on Page 7 (Supporting Document 5) that where a Housing Need and Demand Assessment is 'robust and credible' its approach will not be considered at examination. Instead the examination will focus on the proposed spatial policies for housing set out in the Proposed Plan and their relationship with the findings of the Housing Need and Demand Assessment.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority therefore considers its approach to modelling the scale of the affordable sector, by defining it to include social rented and intermediate housing, to be appropriate.

Reporter's conclusions:
<p>1. It is not inappropriate that the plan should refer to analyses undertaken in its housing need and demand assessment, or to the definitions of the private, affordable and intermediate sectors which were used for that purpose. The text of the plan does not require to be modified for that reason.</p> <p>2. As set out at Issue 22, however, it is appropriate that the strategic development plan sets out an all-tenure housing requirement for each local authority, albeit subject to certain caveats. By doing so, it will recognise that new housing provided in any sector can contribute to meeting that requirement, and that no unnecessary or artificial restrictions are imposed simply because of the definitions adopted for the purposes of the housing need and demand assessment. Modifications to the text of the plan should be made to clarify this.</p>
Reporter's recommendations:
<p>The modifications to the plan arising from the conclusions reached on Issues 17, 19 to 23, and 27 are set out in the Annex which follows Issue 27.</p>

Issue 24	Housing Land Additions: Specific Locations	
Development plan reference:	Spatial Framework 3 Sustainable Communities	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E5/1, E5/2, E5/3, E5/4 Mr Michael and Mr Roger Jones E12 CEMEX UK Ltd. E18 Wm Short esq. E19 Duchal Estate E20 H.J. Paterson E29/2 Ogilvie Homes Ltd E30 NHS Greater Glasgow and Clyde E31 Caledonian Properties E34 James Barr Ltd E35 Messrs Keith & John Lawrence E36 Mr Derek McConechy E37 Forge Properties LLP E50 Hometown Foundation E53/1 SRG Estates</p>		
Provision of the development plan to which the issue relates:	Schedules 8 and 9 (pages 44 and 45)	
Planning authority's summary of the representation(s):		
<p>E5/1, E5/2, E5/3, E5/4 Mr Michael and Roger Jones</p> <ul style="list-style-type: none"> there is a requirement to regenerate and reconnect disadvantaged communities within peripheral housing estates and the allocation of additional land for housing will support localised growth. The site east of <u>Faifley, Clydebank</u>, would support this, if included in the land supply. <p>E12 CEMEX UK Ltd.</p> <ul style="list-style-type: none"> a site at <u>Kilbarchan</u> is suggested for inclusion within the land supply. the effectiveness of the land supply, and its delivery, is over-estimated. affordable and private sector housing should be considered together. The important role of greenfield sites, in sustainable locations, in the contribution to the housing supply, should be reflected in the Proposed Plan. <p>E18 Wm Short esq.</p> <ul style="list-style-type: none"> the Proposed Plan has not considered the deliverability of Community Growth Areas, which may suffer more than smaller sites during the current economic period, and not deliver the required land supply. Schedules 8 and 9 should be revised to include additional land releases. there are location-specific benefits to releasing the land at <u>Lennoxtown</u>, in addition to its effectiveness, such as the resolving of anti-social behaviour, the creation of a Green Belt boundary, choice and quality of housing and provision of a suitable entrance to an area of development. 		

E19 Duchal Estate

- the Proposed Plan has not considered the deliverability of Community Growth Areas, which may suffer more than smaller sites during the current economic period, and not deliver the required land supply.
- Schedules 8 and 9 should be revised to include additional land releases.
- there are location-specific benefits to releasing the land at Kilmacolm, in addition to its effectiveness, such as: community benefits including parking, and traffic and pedestrian safety; limited impact upon the Green Belt; choice and quality of housing including affordable housing; provision of new educational facilities.

E20 H.J. Paterson

- the Proposed Plan has not considered the deliverability of Community Growth Areas, which may suffer more than smaller sites during the current economic period, and not deliver the required land supply.
- Schedules 8 and 9 should be revised to include additional land releases.
- there are location-specific benefits to releasing the land at Bridge of Weir, in addition to its effectiveness, such as: the need for new (affordable) housing; associated local retailing; a creation of a suitable Green Belt boundary; resolving of anti-social behavioural problems on the site.

E29/2 Ogilvie Homes Ltd

- the Proposed Plan has failed to identify any additional strategic land releases for private sector housing to 2025. A new strategic housing allocation should be considered at Knownoblehill, Cleland. This effective and deliverable site is sustainable because of accessibility by road and rail and will allow planning for the long-term growth of the settlement plus the opportunity to create a sustainable balanced community.

E30 NHS Greater Glasgow and Clyde

- NHS Greater Glasgow and Clyde has a variety of portfolio interests which can contribute to the SDP's objectives of recycling urban land by using brownfield land in preference to greenfield land.

E31 Caledonian Properties

- affordability assumptions should be combined and additional land released for housing.
- a mechanism for the release of additional greenfield land should be considered in the Proposed Plan to meet any land supply deficiencies which arise.
- a strategy is needed in case of the non-delivery of larger and more complicated sites such as the Community Growth Areas.
- additional land should be identified for housing beyond and above that identified in the Plan period.
- Caledonian Properties control land which is considered to be suitable and appropriate to accommodate further housing.

E34 James Barr Ltd

- the reliance upon Community Growth Areas to deliver housing is unlikely to be successful, exemplified by the prolonged planning process for a current application.
- the Proposed Plan does not take account of current difficulties in delivering the established housing land supply.

- Schedules 8 and 9 should include additional land releases.
- the Strategic Development Plan should allow flexibility for future housing land allocations and specify the role that smaller and more deliverable sites can make in meeting housing needs early in the Plan period.
- a proposed site at Shields Road, East Kilbride, has been recommended for release through Public Local Inquiry although rejected by the Council.

E35 Messrs Keith & John Lawrence

- the Proposed Plan has not considered the deliverability of Community Growth Areas, which may suffer more than smaller sites during the current economic period, and not deliver the required land supply.
- Schedules 8 and 9 should be revised to include additional land releases.
- the site at Craigton Woods has been promoted through the East Dunbartonshire Local Plan, and sits within an urban context although designated Green Belt.
- there are location-specific benefits to releasing the land at Craigton Woods, in addition to its effectiveness, such as: removal of dangerous trees; resolving of anti-social behavioural problems on the site; making the site safe and secure to the benefit of local people and satisfaction of Council Estates.

E36 Mr Derek McConechy

- allocation of land for housing at 12 Rowan Street, Paisley, currently identified as vacant and derelict land.

E37 Forge Properties LLP

- Glasgow North should be included as a 'Sustainable Development Location' in Diagram 3.
- this includes the site at Cowlairs which has the following features:
 - demand at local level for the development and facilities;
 - neglect of Glasgow North in regeneration activities;
 - massive economic impact
 - unique regeneration opportunity
 - major infrastructure investment
 - addressing deprivation, job creation and homelessness
 - offering growth potential for the city;
 - substantial planning gain and investment
 - positive environmental impacts
 - political support
 - largest zero energy development in Glasgow

E50 Hometown Foundation

- The Proposed Plan should recognise the potential for developments such as the large-scale Owenstown settlement as alternatives to Community Growth Areas or other allocated sites if these are not effective or delayed in delivery.
- The Proposed Plan needs to identify a strategic requirement for additional land to 2025 in order to maintain choice and encourage new investment and growth.
- Diagram 4 of the Proposed Plan should include reference to the potential for community development and ownership initiatives that recognise the wider social benefits of cooperative based proposals to contribute to the wider objectives of the spatial strategy.

- Additional reference (in paragraph 4.81) should be made to the potential role of community owned and co-operatives initiatives in tackling any shortfall in the provision of affordable housing, and also with reference to the funding and delivery of housing (paragraph 4.87), plus specific reference (paragraph 4.88) in terms of innovative mechanisms of funding and delivery.

E53/1 SRG Estates

- additional land must be allocated in the Proposed Plan to encourage development in a depressed market by encouraging investment and stimulating economic growth consistent with the broader objectives of National Planning Framework 2.
- the delivery of Community Growth Areas will be impacted by public expenditure restraint and trading conditions, particularly as large-scale sites are fraught with delivery difficulties and there are estimated delays in delivery of up to 5 years as it stands.
- where allocations such as the defined Community Growth Areas cannot be deemed effective in the short term, supplementary alternative proposals/strategies should be identified at the strategic level. This would allow for sustainable housing development to come forward outwith the Community Growth Areas and placate housing need and demand in the short term.
- land to the south of Shotts owned by SRG Estates would represent a sustainable and appropriate urban extension with regard to the allocation of additional land.
-

Modifications sought by those submitting representations:

Inclusion, in the land supply, of land at the following specific locations:

- East of Faifley, Clydebank (E5/1, E5/2, E5/3, E5/4)
- Land at Barhill Crescent, Kilbarchan (E12)
- South Lodge, Lennoxton (E18)
- Land at Kilmacolm (E19)
- Moss Road, Bridge of Weir (E20)
- Land at Knownoblehill, Cleland (E29)
- Various former NHS sites (E30)
- Land at Summerston/Balmore (E31)
- Land at Westerhill (E31)
- Land at Crofthead (E31)
- Land at Shields Road, East Kilbride (E34)
- Land at Craigton Woods, Milngavie (E35)
- Land at Rowan Street, Paisley (E36)
- Land at Carlisle Street, Cowlares (E37)
- New settlement ("Owenstown"), Douglas Valley, South Lanarkshire
- Land at Stane, North Lanarkshire (E53)

Summary of responses (including reasons) by planning authority:

It is important to note that many of the housing issues are inter-related and other aspects of the responses will be dealt with more fully in other Schedule 4's, notably Issues 17 - 27: The relationship between the housing issues is detailed in the Housing Land - A Strategic Overview paper.

The Glasgow and The Clyde Valley Strategic Development Planning Authority rejects the proposed modifications as the need for additional locations to be added to the housing

land supply is not accepted for the following reasons:

- the Proposed Plan concludes that there is a surplus of housing land already identified through the Housing Land Audit and Urban Capacity Study to 2025.
- the fundamental principles of the Strategic Development Plan require development proposals to reflect the Spatial Development Strategy and support the Spatial Vision. This includes supporting the Sustainable Development Locations as part of the Spatial Strategy, in particular Clyde Waterfront, Clyde Gateway, Ravenscraig, Glasgow City Centre (comprising the Development Corridor) and the Community Growth Areas, all of which have housing as an indicative form of compatible development. Additional housing land release could potentially undermine the delivery of these strategic priorities along with other sites in the existing housing land supply.
- the majority of locations being mooted by representees are greenfield locations, and a key component of the Spatial Vision is the recycling of brownfield land and the vacant and derelict land resource as a development priority. Those brownfield locations which are put forward through representations in principle may support the Spatial Vision and Spatial Development Strategy. Their suitability for future housing would be a matter for Local Development Plans to determine.
- the Spatial Vision is integrated with the Spatial Development Strategy in terms of the Development Corridor, the Core Development Areas and the Spatial Framework including the Green Belt. Locations which encroach into the Green Belt are not to be considered appropriate at this stage, as Local Development Plans will review and designate the Green Belt boundary.

Reporter's conclusions:

1. As identified at Issues 17, 20 and 22, it will be for local development plans to identify sufficient appropriate sites to meet the identified housing requirements across all tenures in their area. At this stage, the surplus of housing land identified in Schedules 8 and 9 is the result of an initial comparison of private sector housing demand against the potential availability of land identified, but not yet, verified through the urban capacity study, and takes no account of the need for land for other sectors.

2. The scope to allocate additional sites will be confirmed through the preparation of the local development plans, and these will be expected to have regard to the vision of the strategic development plan which is based on higher migration population projections, the pursuit of sustainable development and, as identified above by the authority, a review of green belt boundaries. (See also Issue 13.)

3. In these circumstances, it would not be appropriate for the strategic development plan to specify or sanction the release of further individual housing sites, although it will be appropriate for local development plans to assess their merits and decide whether they should be allocated to help meet the confirmed housing requirements.

Reporter's recommendations:

No modifications.

Issue 25	Miscellaneous: Housing	
Development plan reference:	Spatial Development Strategy Spatial Framework 3 Sustainable Communities Glossary	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
E24 Banks Group E28 Bishopton Action Group E29/1 Ogilvie Homes Ltd E55/4 Homes for Scotland		
Provision of the development plan to which the issue relates:	Schedule 6 (page 43) Schedule 7 (page 43) Schedule 8 (page 44) Schedule 9 (page 45) Schedule 10 (page 47) Schedule 11 (page 4) Glossary (page 65)	
Planning authority's summary of the representation(s):		
<p>E24 Banks Group Addition of the terms 'effective land supply' and 'established land supply' to the Glossary.</p> <p>E28 Bishopton Action Group Arithmetic error in Schedule 11 figures for 2016-20 Glasgow and the Clyde Valley total, 2008-25 Max Renfrewshire total, 2008-25 Max Glasgow and the Clyde Valley total are incorrect.</p> <p>E29/1 Ogilvie Homes Ltd The examination process into the North Lanarkshire Local Plan is currently ongoing and the Reporter has requested further information in relation to the Cumbernauld housing sub market figures and its existing and proposed housing land supply. The outcome of this request has potential implications for the Strategic Development Plan.</p> <p>E55/4 Homes for Scotland Arithmetic error in Schedule 10, figures for Estimated Shortfall 2020-25 Glasgow and the Clyde Valley total and Estimated Shortfall 2008-25 Glasgow and the Clyde Valley total are incorrect.</p>		
Modifications sought by those submitting representations:		
<p>E24 Banks Group Seek definitions for 'effective land supply' and 'established land supply' to be added to the Glossary.</p> <p>E28 Bishopton Action Group Schedule 11 figures for 2016-20 Glasgow and the Clyde Valley total should be 6,300; 2008-25 Max Renfrewshire total should be 500; and 2008-25 Max Glasgow and the Clyde Valley total should be 22,300.</p>		

E29/1 Ogilvie Homes Ltd

The finalised land supply figures for North Lanarkshire, incorporated in Schedules 6, 7, 8 and 9, should not be finalised until the Local Plan Reporters recommendations have been published.

E55/4 Homes for Scotland

Schedule 10 figures for Estimated Shortfall 2020-25 Glasgow and the Clyde Valley total should be 12,700 and Estimated Shortfall 2008-25 Glasgow and the Clyde Valley total should be 85,700.

Summary of responses (including reasons) by planning authority:

It is important to note that many of the housing issues are inter-related and other aspects of the responses will be dealt with more fully in other Schedule 4's, notably Issues 17 - 27: The relationship between the housing issues is detailed in the Housing Land - A Strategic Overview topic paper.

E24 Banks Group

The Glasgow and the Clyde Valley Strategic Development Planning Authority notes the proposed suggestion for additions to the Glossary.

E28 Bishopton Action Group

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications as it considers that the 'Notes' relating to Schedule 11 explain the figures used. The figures are rounded to the nearest 500 or 1,000. Further information related to the Renfrewshire position is set out in Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, June 2011, Background Report 12 'Housing Need and Demand Assessment', Technical Appendix TA06 'Review of Supply and Demand/Need for Housing', Table 9.14A (Supporting Document 1).

E29/1 Ogilvie Homes Ltd

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications as it considers that the issues relating to the North Lanarkshire Local Plan Inquiry are a matter for the Local Plan Reporter and any related implications for the Strategic Development Plan and its Examination will be a matter for the Strategic Development Plan Examination Reporter to consider.

E55/4 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification on the grounds that, as appropriate to a Strategic Development Plan, it has rounded the Glasgow and the Clyde Valley Total figures in Schedule 10 to the nearest 1,000.

However, in order to reconcile the Schedule to the figure of 85,000 for the Affordable Sector, as set out in the Housing Need and Demand Assessment, the figure of 12,700 has had, in this instance, to be rounded down.

Reporter's conclusions:

1. Inclusion in the glossary of definitions of the established and effective housing land supplies is a matter for the authority, rather than for this examination.
2. The rounding of the figures in Schedule 11, regarding the maximum potential of

intermediate housing, is also a matter for the authority, rather than for this examination. This schedule does not affect the housing requirements to be met in local development plans. Similarly, the rounding of the figures in Schedule 10 for the total for Glasgow and the Clyde Valley does not affect the housing requirements to be met in individual local development plans.

3. As this plan uses the 2009 housing land audit as its base, it is inevitable that account has not been taken of a range of sites which may subsequently have been granted planning permission or been allocated in local plans, such as North Lanarkshire's. However, these can be taken into account in the preparation of the new local development plans which are intended to ensure the delivery of the housing requirements identified in this plan.

Reporter's recommendations:

No modifications.

Issue 26	Particular Housing Needs	
Development plan reference:	Section 4 Spatial Development Strategy Spatial Framework 3: Sustainable Communities	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
E39 McCarthy and Stone Retirement Lifestyles Ltd		
Provision of the development plan to which the issue relates:	New policy proposed.	
Planning authority's summary of the representation(s):		
<p>E39 McCarthy and Stone Retirement Lifestyles Ltd</p> <p>The representation acknowledges that the Glasgow and the Clyde Valley Housing Need and Demand Assessment, part of the evidence base for the Proposed Plan, clearly notes that the population profile of the region is ageing. It further notes that a key message in the conclusion of the Housing Need and Demand Assessment is that an increase in older person households may have an impact on the housing market as older people look for particular types of properties suitable to their changing needs.</p> <p>The respondent argues that older people, not least given their significance in numerical terms, require recognition in development plans, in the same way as gypsies and travellers and travelling showpeople (reference is made to Scottish Planning Policy, 2010, paragraphs 89 - 91).</p> <p>The Strategic Development Plan should make specific reference to the need to encourage the development of specialist accommodation schemes specifically for the elderly, where private sheltered accommodation schemes have a key role in addressing future housing needs.</p> <p>The representation is supported by one supplementary document. The report largely appears to reference the situation in England. As well as explaining the need to increase the supply of Owner Occupied Retirement Housing (OORH), and the benefits it offers, the report suggests that a number of public policy-related factors have inadvertently contributed to constraining supply. Two of these concern planning-related matters, and are argued to have constrained delivery and increased the prices of homes:</p> <ul style="list-style-type: none"> • <i>A lack of understanding of the benefits of Owner Occupied Retirement Housing at a local and national level</i>, and evidence of a less than positive attitude leading to many planning applications by the respondents having to go to appeal; and • <i>An inappropriate use of S106/section 75 (Scotland) contributions</i>, much of which is used for providing accommodation for younger people, which is argued to be discriminatory against older people. <p>The report proposes that these issues may be addressed by:</p> <ul style="list-style-type: none"> • <i>Better national strategic guidance on housing for the elderly</i>, including recognition in principle that demographic change and an ageing society are central issues for planning 		

- *Better local strategic guidance on housing for the elderly*, including the allocation of sites for Owner Occupied Retirement Housing in local plans and references to the benefits of this type of accommodation in local housing strategies
- *Treat Owner Occupied Retirement Housing as a form of affordable housing* in terms of negotiations with builders over development charges, which would help reduce prices and increase availability.

Modifications sought by those submitting representations:

E39 McCarthy and Stone Retirement Lifestyles Ltd

- (1) Introduce a policy that positively supports the delivery of specialised accommodation for older people including sheltered housing. The following wording is offered as appropriate
 “Development proposals for accommodation designed specifically for the elderly will be encouraged provided that they are accessible by public transport or a reasonable walking distance to community facilities such as shops, medical services, places of worship and public open space.”
- (2) The respondent also proposes that an additional method of encouraging the provision of specialist housing for the elderly could be in the form of a development incentive; it is suggested that private sheltered housing for the elderly could be given an enhanced planning status, similar to affordable housing, in terms of negotiations with builders over development charges.

Summary of responses (including reasons) by planning authority:

It is important to note that many of the housing issues are inter-related and other aspects of the responses will be dealt with more fully in other Schedule 4's, notably Issues 17 - 27: The relationship between the housing issues is detailed in the Housing Land - A Strategic Overview topic paper.

E39 McCarthy and Stone Retirement Lifestyles Ltd

- (1) The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification in that it is not necessary or appropriate to include such a detailed and specific policy in the Strategic Development Plan for the following reasons:
 - The Housing Need and Demand Assessment provides an evidence base not only for the Strategic Development Plan but also for local authorities' Local Housing Strategies and Local Development Plans. Its demographic projections suggest an ageing population and increasing numbers of older person households, and the implications of this changing profile are discussed fully in Chapter 6 'Household Groups with Specific Housing Requirements', Section 6.4 'Older People' (Supporting Document 1). This evidence includes an estimate of private sector housing for older people in Figure 6.4.1, and is designed to meet the requirements of Local Housing Strategies and Local Development Plans. This is consistent with the Scottish Government's approach of encouraging support at home rather than in institutional settings, and closer integration of service delivery between housing, social services and health.
 - The Local Development Plan offers the appropriate level and mechanism for considering a policy of the kind proposed.

- Owner Occupied Retirement Housing is a component of the total private sector housing requirement identified in the Strategic Development Plan. It would be inappropriate for such a strategic level document to attempt to be site specific or to predict the market in terms of specific types of property.
- Professor Ball's report, offered as a supporting document, states that Owner Occupied Retirement Housing developments require relatively small land sites, often brownfield in nature and frequently 'windfall' - Page 38, Section 5, Specific Land Needs (Supporting Document 2). There is nothing in the Strategic Development Plan to preclude such developments, providing they can also satisfy the policy requirements of the Local Development Plan.

(2) The Glasgow and the Clyde Valley Strategic Development Planning Authority therefore considers that within the new Strategic Development Plan, with its focus on Vision and Spatial Strategy, it is inappropriate to include detailed policy on a niche development sector and that this matter relates to Local Development Plan policies, and the negotiation of Section 75 development agreements, which are properly the responsibility of local planning authorities.

Reporter's conclusions:

1. Scottish Planning Policy confirms the importance of development plans addressing the housing needs of different sections of the community. It is also clear that specific provision for older people, whether through specialised housing or care homes, is an increasingly important element in meeting the overall housing requirements of an ageing population.

2. However, given the restricted purpose of the strategic development plan, I am satisfied that the authority is entitled to leave this matter to be dealt with through the policies and proposals of local development plans and their associated supplementary or other guidance.

Reporter's recommendations:

No modifications.

Issue 27	Strategy Support Measure 10: Housing and Local Flexibility	
Development plan reference:	Spatial Development Strategy Spatial Framework 3 Sustainable Communities (page 49)	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E5/4 Mr Michael and Mr Roger Jones E8 Taylor Wimpey UK Ltd E11/3 Ashfield Land E14/3 Land Synergy E15/3 Bellisle Developments Ltd E30 NHS Greater Glasgow and Clyde E31 Caledonian Properties E42/2, E42/6 Lynch Homes E45/6 CALA Homes (West) E46/5 Susan Barnes (Landowner) E49/5 Jackton & Thorntonhall Community Council E52/15 Mactaggart and Mickel (Homes) Ltd. E55/4 Homes for Scotland</p>		
Provision of the development plan to which the issue relates:	Spatial Framework 3 Sustainable Communities (page 49) Local Authority Flexibility and Strategy Support Measure 10 - Housing development and local flexibility	
Planning authority's summary of the representation(s):		
<p>Two diametrically opposed lines of modification are sought</p> <ol style="list-style-type: none"> 1) amend the text to increase the levels of overall flexibility accorded to Local authorities to increase the housing land supply, including the identification of triggers for the future release of effective sites when a five-year effective supply is not being maintained, or, 2) amend the text to remove the flexibility accorded to Local Authorities. <p><u>1) Increase Flexibility</u></p> <p>E5/4 Mr Michael and Mr Roger Jones Local Authorities should have flexibility over suitable greenfield opportunities within or attached to disadvantaged communities.</p> <p>E8 Taylor Wimpey UK Ltd, E11/3 Ashfield Land, E14/3 Land Synergy, E15/3 Bellisle Developments Ltd Remove the strategic priority focus on brownfield land as the source of new housing land allocations with greenfield sites being considered suitable where they accord with the sustainability principles of the plan.</p> <p>E8 Taylor Wimpey UK Ltd Remove the stipulation in Strategy Support Measure 10 that housing development proposals must meet all the provisions of the Measure</p>		

E8 Taylor Wimpey UK Ltd, E52/15 Mactaggart and Mickel (Homes) Ltd.

Meet all the provisions of the sustainable location assessment (Diagram 4, page 6) when it is used by Local Development Planning and Management Authorities

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties, E42/2 Lynch Homes

To support flexibility, the Strategic Development Plan should include the identification of triggers for the future release of effective sites when a five-year effective supply is not being maintained.

E31 Caledonian Properties

General request to allocate more land for housing development to meet Plan's requirements.

E46/5 Susan Barnes (Landowner)

Introduce new text into paragraph 4.89 and Strategy Support Measure Plan to allow for local scale provision, i.e. fewer than 50 units, as a economic reinforcement of local centres.

E42/6 Lynch Homes, E45/6 CALA Homes (West)

Amendments which put the focus on Local Development Plans to ensure five year effective land supplies and Development Management mechanisms to support that focus.

E55/4 Homes for Scotland

Remove paragraph 4.89 and Strategy Support Measure 10 and replace with general text emphasising generous land supplies to meet varying market conditions and ensure five year supplies are maintained through monitoring by the Local Development Planning Authority.

2) Remove Flexibility**E49/5 Jackton & Thorntonhall Community Council**

Delete paragraph 4.89 and Strategy Support Measure 10 and delete provisions for flexibility to lie with the Local Development Plan and Management Authorities.

Modifications sought by those submitting representations:**E5/4 Mr Michael and Mr Roger Jones**

Section 4 paragraph 4.89 at the end of paragraph add 'The exception to this preference would be within or adjacent disadvantaged peripheral housing estate communities where local authorities should assess greenfield sites on their merits to contribute to sustainable development including increased transport provision or local services to allow reconnection opportunities.'

E8 Taylor Wimpey UK Ltd

Delete last sentence in paragraph 4.89, as there is no need to expect releases to be primarily on brownfield land as brownfield land is unconstrained by supply and demand calculations and some authorities like East Dunbartonshire and East Renfrewshire, have limited opportunities for brownfield releases.

Delete the word 'only' from the last line of 2nd paragraph of Strategic Support Policy 10, and 'in full' 4th word of 2nd bullet point.

E11/3 Ashfield Land, E14/3 Land Synergy, E15/3 Bellisle Developments Ltd

Last sentence of paragraph 4.89 be reworded 'These additional releases would be expected to be primarily on brownfield sites where possible, however with a view to maintaining a range and choice of housing sites, greenfield sites should also be considered where these would be in accordance with the sustainability principles of the SDP.'

E31 Caledonian Properties

The Glasgow and the Clyde Valley Strategic Development Planning Authority should identify additional land for housing beyond and above that identified over the plan period. By identifying additional land then it would maintain flexibility in the land supply.

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties, E42/2 Lynch Homes

Include the identification of triggers for the future release of effective sites when a 5 year effective supply is not being maintained.

E42/6 Lynch Homes, E45/6 CALA Homes (West)

Re-word paragraph 4.87 line 6 'have produced levels of housing need and demand'.

Delete paragraph 4.88.

Paragraph 4.89 amend first sentence

'Using the 2010 Housing Land Audit, the SDP has identified that the supply of land within the city region needed to meet projected housing need and demand'.

Paragraph 4.89 delete last sentence and substitute

'In addition, the land releases proposed between 2020 and 2025 can be brought forward through the development management process (without the need for an alteration to the Local Development Plan) if there is a shortfall in the effective land supply. It is necessary for all Local Development Plans to incorporate a policy mechanism to enable a 5 year effective housing land supply to be maintained at all times. This policy mechanism should allow the development process to approve greenfield as a brownfield sites for housing.

Strategy Support Measure 10 amend first sentence

'Local Authorities should continue to audit their housing land supply in light of the prevailing housing market conditions, with a view to augmenting, where appropriate, the effective supply in the short term to 2020.'

Strategy Support Measure 10 amend second sentence

This action is particularly relevant where a private sector contribution could address affordable housing needs.

Strategy Support Measure 10 add additional sentence

'Local development Plans should include a policy mechanism to ensure that a five year housing land supply is maintained at all times and this can release land for sustainable development including greenfield land.'

E46/5 Susan Barnes (Landowner)

Paragraph 4.89 amend last sentence

Add '...or limited growth of local centres...' after 'brownfield sites'.

Strategic Support Measure 10 add new sentence.

'are of less than 50 units in scale and have been assessed against other potential sites within or adjacent to the relevant local centre.'

E49/5 Jackton & Thorntonhall Community Council

Delete sub-section 4.89 and Strategy Support Measure 10 entirely.

E52/15 Mactaggart and Mickel (Homes) Ltd.

Strategy Support Measure 10 reword bullet point two

"Have been assessed against the criteria listed in the sustainable location assessment (Diagram 4)".

E55/4 Homes for Scotland

Paragraph 4.87 third sentence delete all after "local authorities" and replace with "should identify generous supplies of housing land and should evaluate carefully the options for maximising the delivery of affordable housing as part of mixed and sustainable communities."

Delete paragraph 4.89 and Strategic Support Measure 10. Replace with new text: "A generous supply of land should ensure that changes in market conditions can be accommodated. LDPs (Local Development Plans) should ensure through annual monitoring that a minimum 5-year supply of effective housing land is available at all times. If a shortfall emerges, Councils may bring forward additional land using the criteria in Diagram 4 to ensure that needs are met in the most sustainable way".

Summary of responses (including reasons) by planning authority:

It is important to note that many of the housing issues are inter-related and other aspects of the responses will be dealt with more fully in other Schedule 4's, notably Issues 17 - 27: The relationship between the housing issues is detailed in the Housing Land - A Strategic Overview topic paper.

E5/4 Mr Michael and Mr Roger Jones

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as the use of exceptions in this instance potentially undermines the sustainability principles of the Strategic Development Plan by introducing local considerations inappropriate to at the strategic scale. These considerations are more appropriately dealt with at the local development plan level.

E8 Taylor Wimpey UK Ltd, E11/3 Ashfield Land, E14/3 Land Synergy, E15/3 Bellisle Developments Ltd

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification for the following reasons:

- the Proposed Plan reflects the Scottish Government's Scottish Planning Policy's (2010) (Sections 35, 37, 38, Page 7 and Section 40, Page 8) (Supporting Document 1) promotion of regeneration and re-use of previously development land, as the focus for sustainable development, living within environmental limits and improving the quality of the built environment.
- brownfield land remains a significant resource in the city-region providing a range of strategic spatial options for sustainable development, Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, June 2011, Background Reports 4 'Vacant and Derelict Land 2010' and 13 'Urban Capacity Study 2009' (Supporting Documents 2 and 3).
- Brownfield land's prioritisation for development is wholly consistent with the focus on meeting the Scottish Government's ambition of low-carbon, climate change mitigation and sustainable development.

- paragraph 4.89 and Strategy Support Measure 10 both emphasise that brownfield land options remain the primary strategic focus, but as reflected in the wording and intent of the Measure, greenfield options may be appropriate if the brownfield option is undeliverable in the short term.
- it would be inconsistent with the basic philosophy of the Proposed Plan other than to place the strategic focus on the brownfield land resource.

E8 Taylor Wimpey UK Ltd

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications for the following reasons as Strategy Support Measure 10 :

- provides clarity to local planning authorities regarding local flexibility and scale, on how to exercise that flexibility in their local development plans and development management decisions when meeting the needs of the Spatial Development Strategy.
- emphasises that flexibility be applied framed by the principles of the Proposed Plan, its sustainable locations' focus, infrastructural investment and emerging Local Development Plan frameworks.
- is not a 'carte blanche' to development, but is carefully designed to support the direction and focus of the Spatial Development Strategy and the proposed modification would weaken that strategic focus.

E8 Taylor Wimpey UK Ltd, E52/15 Mactaggart and Mickel (Homes) Ltd.

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification for the following reasons:

- the sustainable locations assessment tool (Diagram 4, page 6) provides the development management authority with a framework to assess the sustainability of a proposed development location.
- the sustainable locations assessment tool is designed to reflect the basic integrated strategic thinking of the Proposed Plan and therefore needs to be applied in its entirety. It is not a 'pick-and-mix' tool where its use can support any particular development agenda, as that agenda may conflict with other competing strategic components.

E31 Caledonian Properties

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification for the following reasons:

- the Proposed Plan provides a generous land supply for housing development, as well as according local flexibility, where appropriate, to secure local scale developments over and above the existing supply.
- allocating even more land in non-sustainable locations, in a period where demand is significantly depressed by economic conditions, lack of mortgage finance and consumer confidence, would not lead to enhanced levels of development.
- the Proposed Plan, through the Community Growth Areas, thirteen in number and with capacity for over 20,000 units already provides a significant potential for sustainable greenfield development in addition to its brownfield focus.
- allocating even more land in non-sustainable locations over and above the current generous supply would add to land banks in non-sustainable locations and erode

the strategic focus on sustainable development. It would be in direct contradiction of the Proposed Plan's drive to meet the Scottish Government's vision of a sustainable and low-carbon future.

E46/5 Susan Barnes (Landowner)

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it is considered a local issue which will be addressed within forthcoming local development plans and does not require a Strategic Development Plan response.

E30 NHS Greater Glasgow and Clyde, E31 Caledonian Properties, E42/2 Lynch Homes

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it considers that Strategy Support Measure 10 provides the appropriate strategic 'trigger' for local authorities in relation the continual auditing of their housing land supply and thereby supports flexibility in the housing land supply.

E42/6 Lynch Homes, E45/6 CALA Homes (West), E55/4 Homes for Scotland

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification:

- local development planning authorities are directed by Scottish Planning Policy (section 72, page 15) to maintain a five-year housing land supply so it is unnecessary for the Proposed Plan therefore to repeat that stipulation.
- management of the local development plan process and its need for alterations is an issue for the relevant local authority.
- the Proposed Plan already provides an overall strategic context of a generous land supply to address market sector demand, and in respect of the 'affordable' sector, provides land supply flexibility to the local authority, as appropriate, whilst additional local housing and planning work is undertaken to confirm the needs of that sector.
- Strategy Support Measure 10 is the Proposed Plan's framework for that local flexibility, ensuring its need to reflect the principles of the Strategic Development Plan and meet the requirement to locate new development in sustainable locations.

Category 2

E49/5 Jackton & Thorntonhall Community Council

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification.

- Paragraph 4.87 (page 49) of the Proposed Plan highlights, as an integral component of the Housing Needs and Demand Assessment (Glasgow and the Clyde Valley Strategic Development Plan Proposed Plan, June 2011, Background Report 12 'Housing Need and Demand Assessment') (Supporting Document 4 - deemed 'robust and credible' by the Scottish Government's Centre for Housing Market Analysis), that a range of assumptions are inherent in the methodology which are critically sensitive, and that even small variations in these assumptions can lead to radically different results.
- Local variations in the outcomes of the Housing Needs and Demand Assessment suggest that more detailed work will be necessary in Local Housing Strategies and Development Plans in order to confirm final outcomes.

- New-build housing, as a response, is not an automatic outcome and in terms of a sustainable approach, capitalising on the current building stock is the first step.

Paragraph 4.89 and Strategy Support Measure 10 reflect therefore a need for flexibility in responding to this issue through release of more land to address local short-term issues.

Reporter's conclusions:

1. It would be inappropriate to suggest that achieving the vision of the strategic development plan is wholly dependent on the use of brownfield land. However it is appropriate to give priority to the re-development of brownfield sites. Across Glasgow and the Clyde Valley, the scale of the brownfield land resource is so great that it provides significant scope to secure a range of developments, including housing, in very sustainable locations.

2. However, the development of some greenfield sites is also integral to the success of the strategy. Most of the community growth areas and parts of the effective housing land supply already consist of greenfield sites, and the plan endorses their contribution to achieving its vision through sustainable forms of development. Additional sites which have been identified on a preliminary basis through the urban capacity study include land which is currently open space and 'other' types of land which may include greenfield locations. As with all the other new sites identified through the urban capacity study, they still have to be justified, assessed and tested through the preparation process of the local development plans.

3. It is therefore appropriate that the strategic development plan confirms the flexibility which is open to local authorities. This applies both in identifying the land to be allocated in their local development plans, but also when it is necessary to grant additional planning permissions to remedy any emerging shortfall in the five years' effective housing land supply. The use of the assessment criteria set out in Diagram 4 should be to ensure that the most sustainable sites are selected, while also enabling the plan's vision to be realised by ensuring that sufficient land to meet the housing requirements is available and effective.

4. The plan should also make clear that housing land which is allocated for development during the period 2020 to 2025 may be brought forward and granted planning permission for earlier development in circumstances when an emerging shortfall in the five years' effective housing land supply might otherwise justify releasing other sites in less sustainable locations.

5. The wording of Strategy Support Measure 10 and the plan's associated text should be modified to reflect this.

Reporter's recommendations:

The modifications to the plan arising from the conclusions reached on Issues 17, 19 to 23, and 27 are set out in the Annex which follows Issue 27.

ANNEX:

RECOMMENDED MODIFICATIONS ARISING FROM ISSUES 17, 19 to 23, and 27

1. Delete the final sentence of paragraph 4.65.
2. Replace the third sentence of paragraph 4.70 with: 'These periods align with the anticipated adoption of local development plans by 2015, ensuring both that a five years' effective housing land supply is maintained throughout the period up to 2020, and that these plans' housing land allocations also allow for a longer term supply up to 2025.'
3. In paragraph 4.71, modify:
 - The first sentence by deleting 'adopting optimistic household projections,';
 - The second sentence by deleting 'All', and by replacing 'has been deferred to' with 'will be confirmed by'.
4. Add to the end of paragraph 4.72: 'The planned development of the community growth areas is also intended to deliver sustainable communities, although mainly on greenfield sites.'
5. Replace the third and fourth sentences of paragraph 4.75 with: 'Schedules 8 and 9 show that there may be sufficient land from these combined sources to meet demand in this sector both to 2020 and to 2025. This preliminary conclusion will be subject to the detailed assessment of all sites to be allocated in local development plans. The requirements shown in Schedules 6 and 7, and also reflected in Schedule 11A, supersede the approved 2006 structure plan.'
6. Replace the final two sentences of paragraph 4.76 with: 'The number of additional private sector house completions required in each local authority area is set out in Schedule 7. This is derived from the comparison of private sector supply and demand for each housing market area set out in Schedules 8 and 9, and takes account of shortfalls and surpluses identified there. The requirements set out in Schedule 7 for the private sector are to be met through housing land allocations in local development plans in accordance with the all-tenure housing requirements identified indicatively in Schedule 11A.'
7. Replace the final two sentences of paragraph 4.77 with: 'On this preliminary and indicative basis, existing sites already identified in housing land audits together with new sites identified through the urban capacity study may be sufficient to meet all private sector housing requirements up to 2025 across all housing market areas. However, local authorities will be required to demonstrate that the sites to be allocated in their local development plans are capable of proving effective in delivering the required housing completions in the relevant periods, and will maintain the availability of a five years' effective housing land supply throughout. This will ensure the provision of a sufficiently generous housing land supply for the private sector to meet the identified housing requirements, both to 2020 and to 2025.'
8. Modify the title of Schedule 8 to read: 'Preliminary and Indicative Comparison of Private Sector Supply and Demand, 2009 to 2020, Housing Market Areas'
9. Modify the title of Schedule 9 to read: 'Preliminary and Indicative Comparison of Private Sector Supply and Demand, 2009 to 2025, Housing Market Areas'

10. After Schedule 11, add:

‘Schedule 11A: Indicative all-tenure housing requirement 2008/2009 to 2025, by local authority area

Local authority area	2008/2009 to 2020	2020 to 2025	2008/2009 to 2025
East Dunbartonshire	9,100	1,600	10,700
East Renfrewshire	5,200	500	5,700
Glasgow City	71,500	19,900	91,400
Inverclyde	5,200	200	5,400
North Lanarkshire	15,200	6,400	21,600
Renfrewshire	9,100	2,700	11,800
South Lanarkshire	29,100	3,800	32,900
West Dunbartonshire	2,800	1,200	4,000
GCV total	147,200	36,300	183,500

11. Add footnote to Schedule 11A to read: ‘The figures in each column for each local authority area are derived by adding the relevant figures from Schedules 7 and 10.’

12. Modify the titles above the text from paragraphs 4.85 to 4.89 to read: ‘Indicative All-Tenure Housing Requirement and Local Authority Flexibility’.

13. Modify the text from paragraph 4.85 to paragraph 4.89 to read:

‘4.85 The indicative all-tenure housing requirement set out in Schedule 11A reflects the information set out in Schedules 7 and 10. The figures in Schedule 11A aggregate, for each local authority area and for the periods to 2020 and then to 2025, both the estimated number of net new private sector completions required to meet projected demand and the estimates for affordable sector housing needs.

4.86 Schedules 7 and 10 are both derived from the housing need and demand assessment, but the figures require to be treated as indicative at this stage, as a number of important caveats apply to the results of the assessment. These require to be considered further in the preparation of each local authority’s local housing strategy and local development plan, mainly because different methodologies were used for calculating private sector demand and affordable housing needs. In preparing its local development plan to comply with this strategic development plan, each planning authority should justify any variation from the indicative requirements set out in Schedule 11A.

4.86a Such variations could be demonstrated from further analysis in relation to:

- The scale of backlog need and the rate at which it can be met;
- The scale of identified need for affordable housing;
- The likely availability of public subsidy;
- The capacity of private developers to deliver various forms of affordable housing;
- Double-counting or under-counting arising from the use of inconsistent methodologies, including the different base dates of 2008 and 2009;
- The extent to which housing needs can be met without building new houses;

- The application of quota policies to secure affordable housing on a proportion of a private sector site;
- The identification of insurmountable infrastructure constraints; or
- Agreement of an adjoining authority to meet some of the identified housing needs or demands.

4.87 The strategic assessment of housing requirements has been undertaken in the knowledge that the range of assumptions employed in the housing need and demand assessment has produced levels of need that require further consideration against likely future funding and delivery issues. This requirement remains an important role for local authorities in their local housing strategies and local development plans. The degree of uncertainty in the current housing market, and in the availability of public subsidy, suggests that the constituent local authorities may require additional flexibility to plan for housing, particularly over the short term to 2020 in relation to the private sector, and to test further the policy implications of the outcomes for the affordable sector.

4.88 It is anticipated that the provision of affordable housing, particularly low cost home ownership, will be met through established quota-style policies, supplementary guidance, or other more innovative private sector or public-private delivery mechanisms. However it is also recognised that new housing provided in any tenure will contribute to meeting the overall housing requirement which has been identified across Glasgow and the Clyde Valley. Assumptions regarding the likely tenure of the provider should not impose artificial or unnecessary restrictions on new housing provision.

4.89 In Schedules 8 and 9, the strategic development plan has identified, on a preliminary and indicative basis, that sites identified through the urban capacity study, in addition to the existing effective housing land supply, may be sufficient to meet private sector housing demand for the period to 2025.

4.89a However, local development plans should seek to ensure that a five years' effective housing land supply is maintained at all times throughout their plan periods, and are required to demonstrate that the sites which they propose to allocate are likely to be capable of delivering the identified housing requirement for the relevant plan periods across all tenures.

4.89b Scottish Planning Policy requires, in areas such as Glasgow and the Clyde Valley where there is a strategic development plan, that local development plans should allocate land on a range of sites which is effective or capable of becoming effective to meet the housing land requirement up to year 10 from the predicted year of adoption, ensuring a minimum of five years effective land supply at all times.

4.89c Local development plans in Glasgow and the Clyde Valley should therefore allocate sufficient land which is effective, or likely to be capable of becoming effective, so as to deliver the scale of house completions required across all tenures both in the period to 2020, and from 2020 to 2025.

4.89d This will help to ensure that at 2020, there will still be a five years' effective housing land supply for the period 2020 to 2025. By doing so, the requirement of Scottish Planning Policy for the provision of a generous allocation of housing land across all tenures can also be met.

4.89e This will require each local authority to test the likely effectiveness of any site which is to be allocated for housing development in relation to possible environmental and infrastructure constraints as well as other relevant criteria. This will apply not only to sites identified in the urban capacity study, but also to others which are brought forward during preparation of the local development plan.'

14. Modify Strategy Support Measure 10 'Housing development and local flexibility' to read:

'Local authorities should continue to audit their housing land supply in light of the prevailing housing market conditions and other changing circumstances, with a view to maintaining a five years' effective housing land supply across all tenures throughout the period to 2020.

This action is particularly relevant where a private sector contribution could address housing needs in the affordable sector.

Where the supply needs to be augmented, priority should be given to bringing forward for earlier development any sites which have been allocated in the local development plan for construction in the period 2020 to 2025.

If further sites are needed, their identification for release should be guided by:

- use of the criteria in Diagram 4 to find the most sustainable locations;
- absence of insurmountable infrastructure constraints and availability of the necessary funding for any new infrastructure needed;
- the site being of a scale which is capable of delivering its house completions in the next five years; and,
- the vision and planning principles of both the strategic development plan and the local development plan.'

Issue 28	Network of Strategic Centres	
Development plan reference:	Philosophy and Principles Spatial Framework 3 Sustainable communities	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>E20 H.J. Paterson E21/1 National Grid Property Ltd E26/3 ASDA Stores Ltd E33 Buchanan Partnership E41 Hammerson (Retail Property Holdings Ltd) E44 Paisley West & Central Community Council E56 Ravenscraig Ltd. E61 Clydebank re-built</p>		
Provision of the development plan to which the issue relates:	<p>Diagram 3 (page 5) Diagram 4 (page 6) Network of Strategic Centres and Strategy Support Measure 11 (page 51) Schedule 12 (page 52) Diagram 18 (page 53) Diagram 20 (page 61)</p>	
Planning authority's summary of the representation(s):		
<p>E20 H.J. Paterson</p> <ul style="list-style-type: none"> • Bridge of Weir retailing is sub-standard and the site at Moss Road could provide an opportunity for meeting local retail needs. <p>E21/1 National Grid Property Ltd and E26/3 ASDA Stores Ltd</p> <ul style="list-style-type: none"> • the data source employed (National Survey of Local Shopping Patterns) has limited reliability (because of survey design and sample) which should be acknowledged, and is also out-of-date. • Retail Capacity Assessments have a number of significant weaknesses and are an unreliable tool for retail planning purposes. • the assessment that superstore comparison retailing is not a strategic issue is supported and should be included in the Proposed Plan as a Policy Statement. • the assessment of superstore comparison shopping as a 'potentially strategic issue' is not supported by evidence, and this ancillary shopping floorspace has an important role to offer; therefore the only risk to the strategic network of centres is the impact of proposed new development upon the vitality and viability of the strategic centres. <p>E33 Buchanan Partnership</p> <ul style="list-style-type: none"> • the evidence base is out of date and has not captured the full trading impact of Silverburn/Pollok, with no retail capacity assessment. • the extent of 23 strategic centres is not sustainable in Scotland and the Proposed Plan should address and differentiate these centres, rather than only identifying Glasgow City Centre. • there is potential for retail impact on Glasgow City Centre from further retail development at Braehead and elsewhere. 		

E41 Hammerson (Retail Property Holdings Ltd.)

- the role and catchment of Pollok/Silverburn has been underestimated and that of Braehead overestimated.
- the inclusion of Braehead within the strategic network of centres is objected to, as it is not a town centre, and it should be deleted.

E44 Paisley West & Central Community Council

- Braehead should not be given increased civic consideration and the residential element should be linked to the historic town centre of Renfrew.

E56 Ravenscraig Ltd.

- Most matters raised in response to Main Issues Report have been addressed in Proposed Plan, however the indicative forms of development (diagram 3) should include 'retail' for Ravenscraig, and Schedule 12 should be expanded with regard to Ravenscraig to fully reflect the masterplan.

E61 Clydebank re-built

- The approach of directing Local Development Plans to manage and develop Strategic Centres is supported, but this needs to reinforce town centres and support the sequential test.

Modifications sought by those submitting representations:**E20 H.J. Paterson**

- Bridge of Weir should be considered for retail development.

E21/1 National Grid Property Ltd and E26/3 ASDA Stores Ltd

- Background Report 14 should be modified to:
 - acknowledge the limited reliability of the NSLSP data source;
 - to delete reference to Retail Capacity Assessments;
 - to delete the assessment of superstore non-food shopping as a potential strategic issue for Local Development Plans;
 - to recognise that only where retail proposals affect the vitality and viability of strategic centres will they pose any risk to the strategic network of centres;
 - to recognize the important role of ancillary comparison floorspace within foodstores;
 - to justify the selected definition of strategic centres beyond quantified retail spend.
- A Policy Statement should be included in the Proposed Plan to state that superstore retailing is not a strategic issue.
- the Proposed Plan should recognise that only where retail proposals affect the vitality and viability of strategic centres will they pose any risk to the strategic network of centres.

E33 Buchanan Partnership

- the designations and hierarchy of the Strategic Network of Centres should be undertaken at the Strategic Development Plan level, and Strategy Support Measure 11 in the Proposed Plan should reflect this change.
- Schedule 12 of the Proposed Plan should be amended to differentiate between the roles and relationships of different centres.
- Chapter 4 and Schedule 12 of the Proposed Plan should acknowledge that Pollok/Silverburn is of greater strategic significance than Braehead.

E41 Hammerson (Retail Property Holdings Ltd.)

- Braehead should be removed from Schedule 12 of the Proposed Plan or identified as a separate category from the listed town centres, with suitable amendments to Strategy Support Measures 1 and 11.

E56 Ravenscraig Ltd.

- 'Retail' should be listed against Ravenscraig in Diagram 3 of the Proposed Plan.
- Schedule 12 of the Proposed Plan should list "delivery of a diverse, mixed use town centre incorporating a full range of functions including major leisure and retail uses, thereby securing regeneration and investment in the wider area".

E61 Clydebank re-built

- the sequential test for the location of retail investment must not be dropped from strategic policy (Diagram 4 and page 51) in the Proposed Plan.

Summary of responses (including reasons) by planning authority:

The focus of the Strategic Development Plan is the identification of a Strategic Network of Centres, as part of a concise and visionary document, for development and management through the Local Development Plan process. The Glasgow and the Clyde Valley Strategic Development Planning Authority consider that the proposed modifications do not support this objective and are rejected for the following reasons:

E20 H.J. Paterson

- Bridge of Weir is not considered to be a Strategic Centre and as such local retail planning matters are more appropriately considered at the Local Development Plan level.

E21/1 National Grid Property Ltd and E26/3 ASDA Stores Ltd

- Background Report 14 (Supporting Document 2) is a technical paper and is not part of the formal Examination process. With regard to points raised by the representation, the National Survey of Local Shopping Patterns is an established and reputable data source, usefully employed at the strategic level. However, the representations regarding the data year of 2008 and alternative analyses will be noted and taken forward through a strategic Retail Capacity Assessment as part of on-going monitoring.
- in terms of a Policy Statement to the effect that superstore food retailing is not a strategic issue, as stated in Background Report 14 it is not considered that this is required in the Strategic Development Plan. The Proposed Plan is intended to be a concise and visionary document and the focus of the Plan is the identification of a Strategic Network of Centres. The Background Report is a technical paper which explains the non-inclusion of food retailing, and also bulky goods retailing as local planning issues, albeit with potential impact in terms of comparison goods floorspace.
- it is not considered appropriate to state that only where retail proposals affect the vitality and viability of strategic centres will they pose any risk to the strategic network of centres. This would be a reiteration of national retailing policy and therefore unnecessary in terms of meeting the objective of the Proposed Plan as set out above.

E33 Buchanan Partnership

- there is not a hierarchy within the Strategic Network of Centres, other than recognition that Glasgow City Centre plays a significantly wider role than just the

city-region. The development and management of these centres is considered a matter more appropriately dealt with by Local Development Plans, albeit with some outline guidance as detailed in Schedule 12, and therefore it is not appropriate to amend Strategy Support Measure 11 or Schedule 12 of the Proposed Plan.

E41 Hammerson (Retail Property Holdings Ltd.)

- The Strategic Development Plan Proposed Plan identifies the Strategic Network of Centres and does not differentiate between town centres and other centres. Town centre status and boundaries are matters for Local Development Plans, based upon the relationship of centres with their respective communities, as stated by the Scottish Government (supporting Document 2). Braehead is identified as a Strategic Centre which is supported by the owners Capital Shopping Centres plc (Supporting Documents 3 and 4), and although it is acknowledged that Pollok/Silverburn's relative retail performance has increased since 2008, it is not appropriate to list or rank centres other than acknowledging the relationship between the City Centre and the other Strategic Centres of the network.

E56 Ravenscraig Ltd.

- there is not a need to modify Diagram 3 and Schedule 12 of the Proposed Plan, as these are considered to represent Ravenscraig's function appropriately. Diagram 3 refers to Ravenscraig's economic activity role, but also a retail role as part of the Strategic Network of Centres in the same table. Schedule 12 makes reference to the masterplan under 'Future Actions'.
- the Sequential Test is established in Scottish Planning Policy and does not require repetition in the Strategic Development Plan, a concise and visionary document focused upon the identification of the Strategic Network of Centres.

E61 Clydebank re-built

- the management of non-strategic centres is a matter for the appropriate Local Development Plan, although the points are noted.

Representations of Support

In addition to the representations seeking modifications, there is support for the inclusion of Braehead in the Strategic Network of Centres from Capital Shopping Centres (Supporting Documents 3 and 4), and general support for the approach of the Proposed Plan from the John Lewis Partnership (Supporting Document 5) plus support of the direction of large-scale retailing away from smaller centres in East Dunbartonshire from Jo Swinson MP (Supporting Documents 6 and 7).

Reporter's conclusions:

Bridge of Weir

1. It is argued for HJ Patterson (representation E20) that additional retail provision at Bridge of Weir (as part of a larger development) would stem expenditure leakage, improve sustainability and assist in local regeneration.

2. I consider that, as Bridge of Weir does not have the status of a Strategic Centre, this matter is more appropriately addressed at local development plan level.

Background Report 14: Network of Strategic Centres

3. National Grid Property and Asda Stores (representations E21/1 and E26/3) consider that the limited reliability of National Survey of Local Shopping Patterns and unreliability of retail capacity assessment as a tool should be recognised in Background Report 14: Network of Strategic Centres.

4. They object to the comment in the report that ancillary comparison retailing in superstores may risk the vitality and viability of the strategic network of centres, as unjustified and too sweeping. The proposed plan should acknowledge that only where such risks are demonstrated through retail impact assessment will they threaten strategic centres.

5. However, the examination is restricted to the proposed plan. I cannot recommend changes to the background reports. Moreover, since those reports will not form part of the approved plan, it is not necessary to add to what is intended to be a concise plan in order to qualify comments in those reports.

6. The strategic development plan does not identify convenience retailing as one of the strategic planning issues which it requires to address. It does not need to contain a statement to the same effect.

Evidence base

7. The Buchanan Partnership (representation E33) considers that the evidence used to inform the designation of the network of strategic centres is out of date. Also that it may have failed to capture the full trading impact (especially on Glasgow City Centre) of the large new Silverburn Shopping Centre in Pollock.

8. The strategic planning authority has conceded that the 2008 data year will require to be updated through ongoing monitoring. Trading impacts will also, no doubt, require to be updated, but this has no consequences for policy in the current proposed plan.

Hierarchy and number of centres

9. The Buchanan Partnership (representation E33) questions whether a country the size of Scotland can sustain the designation of 23 strategic centres in the sub-region. By contrast, the proposed Edinburgh City Region Strategic Development Plan identifies only 4 strategic retail centres outside Edinburgh city centre. The Partnership also questions placing 22 of those centres on an equal policy footing given that they exhibit such variety of role and significance. Establishing a retail policy hierarchy should not be left to the local development plan process. For example, in Renfrewshire, Braehead and Paisley are within 2 miles of each other and serve broadly the same catchment. The designation of both as strategic centres will not assist Renfrewshire Council in preparing its local development plan.

10. It is argued for National Grid Property (representation E21/1) that increasing the number of strategic centres from 20 in the Main Issues Report to 23 in the proposed plan is not consistent with the recognition in Background Report 14 that their principal function relates to retail offer.

11. Barrhead, Partick / Byres Rd and Shawlands have been added to the list of strategic centres previously proposed in the Main Issues Report on the basis that they share many of the characteristics of other strategic centres, and fulfil social, leisure and employment roles. Whilst retail offer was the starting point for the authority's definition of the network of centres, its decision to throw the net wider allowed for the wider mix of functions promoted for town centres.

12. Scottish Planning Policy states that the network of centres identified in development plans may take the form of a hierarchy, but gives no guidance on numbers of centres. Therefore, whilst there is clearly scope for a difference of opinion on the number of

strategic centres and the flat hierarchy proposed in the strategic plan, I have no grounds to insist on fewer centres or a deeper hierarchy. Neither aspect of the proposed plan has been shown to be manifestly inappropriate. There may be differences between the approach of the strategic planning authorities, but this is a legitimate exercise of choice for each city region.

13. Both Braehead and Paisley are identified as part of the network of strategic centres set out in Schedule 12. The schedule confirms that, unlike Paisley, Braehead does not include 'town centre' among its current planning status and dominant roles and function. Strategy Support Measure 11 confirms that local development plans should be the primary vehicle for taking forward the management and development of the network of strategic centres, in particular with provisions to arrest the decline of traditional town centres. As the Renfrewshire local development plan can therefore be expected to address these issues in relation to both Braehead and Paisley, no further modification to the strategic development plan is necessary.

Braehead

14. The Buchanan Partnership (representation E33) takes the view that Braehead does not fulfil the role of a town centre. It has no doctor, dentist, community or civic facilities and limited bus services from its catchment. Its potential for designation as a strategic centre should await consideration of its forth-coming masterplan and diversification proposals.

15. Hammerson (Retail Property Holdings) (representation E41) take a similar position. They also criticise the lack of differentiation in the plan between town centres, which receive policy protection afforded by Scottish Planning Policy, and commercial centres, which do not. By inclusion in Schedule 12 and Diagrams 18 and 20, Braehead, although described as a commercial centre, would be covered by Strategic Support Measures 1 and 11. In effect, this would accord it the same priority for investment and development and the same protection as town centres. To avoid that, Braehead should be removed from Schedule 12, or placed in a separate category with appropriate amendments to the wording of the relevant support measures.

16. Scottish Planning Policy states that a network of centres "will, depending on circumstances, include town centres, commercial centres and other local centres." Braehead is classed as a commercial centre. As such, it would not be expected to contain the range of facilities found in a town centre. The authority states that because of its scale as a significant sub-regional shopping destination, it would be anomalous to omit Braehead from the network. However, as a commercial centre, Braehead would attract lesser policy protection within the sequential approach, as established in Scottish Planning Policy. Moreover, Glasgow city centre enjoys enhanced policy protection by virtue of its position at the apex of the hierarchy.

17. The issue of whether Braehead should be identified as a town centre is being explored in the current Renfrewshire local development plan exercise.

Paisley

18. The membership and representativeness of Paisley Vision Board are matters outwith the remit of the strategic plan.

Pollock/Silverburn

19. Hammerson (representation E41) argue that a review of the retail market undertaken

for them by CACI should be preferred to that described in Background Report 14. In consequence, the plan should acknowledge that Pollock/Silverburn is of greater strategic significance as a retail destination than Braehead. They contest the statement in the plan that the retail element of Pollock/Silverburn is predominantly accessed by car.

20. The plan elects not to categorise strategic centres into more than two hierarchical levels. Pollock/Silverburn and Braehead fall within the same level. There is therefore no need for the plan to distinguish between the relative significance of the two centres. Hammerson point to the availability of non-car access modes to the centre, but produce no evidence to substantiate their claims about relative levels of car and non-car usage.

Ravenscraig

21. Ravenscraig Ltd (in representation E56) contend that “retail” should be added to the list of indicative forms of development for Ravenscraig in Diagram 3. This would, they argue, reflect the planning permission and masterplan. In Schedule 12, they seek the addition to the list of challenges for Ravenscraig of the phrase “delivery of a diverse, mixed use town centre incorporating a full range of functions including major leisure and retail uses, thereby securing regeneration and investment in the wider area.”

22. As the strategic planning authority point out, in Diagram 3 “economic activity” is listed as an indicative form of development for Ravenscraig. Thus they would seem to see this as encompassing retailing. Moreover, since Ravenscraig is included in the Network of Centres, and Diagram 3 shows “retail” as an indicative form of development for those centres, this would apply to Ravenscraig. Given those points and reference to the masterplan under the heading of “Future Actions”, there is no requirement to elaborate on the challenges for Ravenscraig in Schedule 12.

Sequential approach

23. Clydebank Rebuilt (representation E61) express concern that the sequential approach for retail development is no longer included in strategic policy, and request its reinstatement.

24. However, the sequential approach remains in Scottish Planning Policy, and there is no need for the regional plan to reiterate national policy.

Reporter’s recommendations:

No modifications.

Issue 29	Infrastructure: Energy	
Development plan reference:	Spatial Development Strategy Spatial Framework 4 Infrastructure	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
E57 Scottish and Southern Energy Plc & Group Companies E58 Strathclyde Partnership for Transport E63 Hillhead Community Council		
Provision of the development plan to which the issue relates:	Spatial Development Strategy Spatial Framework 4 Infrastructure Energy (pages 54 and 55)	
Planning authority's summary of the representation(s):		
<p>E57 Scottish and Southern Energy Plc & Group Companies As a centralised energy generator, Scottish and Southern Energy are concerned about the level of reliance upon decentralised local energy generation in the Spatial Vision and Proposed Plan. It does so in the context of the future of centralised energy generation and the UK Government's White Paper on the future of that sector. The representation acknowledges that decentralised energy generation will have a role to play but seeks clarification on the integration between centralised and decentralised and on the spatial aspects of how the latter may be realised in the city-region.</p> <p>E58 Strathclyde Partnership for Transport Seeks to raise the significance and the profile of decarbonisation in the transport agenda by highlighting its potential as a priority within the energy approach of the Proposed Plan.</p> <p>E63 Hillhead Community Council General concern about the energy sector and current renewable energy mix and the perceived over-reliance upon wind energy, the potential of tidal power, the efficacy of wave power and biomass and promotes the role of local-scale power generation from rivers.</p>		
Modifications sought by those submitting representations:		
<p>E57 Scottish and Southern Energy Plc & Group Companies The section of the Strategic Development Plan entitled 'Energy and a Paradigm Shift' is likely only to apply to wholesale regeneration areas, the development of new communities and not to the wider spatial strategy for energy development. However, this lacks clarity and it is recommended that this is made absolutely clear within the Strategic Development Plan.</p> <p>E58 Strathclyde Partnership for Transport Section Energy: Emissions and Energy Supply on page 54 should include a reference to the decarbonisation of transport as a priority.</p> <p>E63 Hillhead Community Council No specific modification sought.</p>		

Summary of responses (including reasons) by planning authority:**E57 Scottish and Southern Energy Plc & Group Companies**

The Glasgow and the Clyde Valley Strategic Development Planning Authority notes the nature of the representation and its request for clarity.

The relationship between Centralised and Decentralised Energy Generation in the Future of the City-Region

The representation appears to be a misunderstanding of the Proposed Plan's drive towards a low carbon energy future and the role of land-use strategy in achieving that future. That drive is underpinned by systematic scenario analysis of energy futures (Background Report 6) (Supporting Document 1) which would deliver the greenhouse gas emissions targets set by the Scottish Government (Climate Change (Scotland) Act 2009) (Supporting Document 2). That work establishes decarbonisation of fuels and energy as essential to the future.

Paragraph 4.104 of the Proposed Plan sets out the Glasgow and the Clyde Valley Strategic Development Planning Authority's 'direction of travel' in terms of the future energy paradigm and the shift towards the decarbonisation of supply, either through substitution of non-carbon fuels or through carbon-capture and storage.

Whilst substituting non-carbon fuels can contribute to the centralised energy generation mix and its transmission on the National Grid, carbon-capture and storage is anticipated as the essential future step in addressing such generation from existing carbon-fuel central generating stations.

The Proposed Plan predicates its strategy on centralised energy generation companies moving to implement such technology, once beyond prototype, in order to decarbonise centrally generated energy. In terms of the city-region, it has few land-use ramifications.

However, at the same time, paragraphs 4.106 to 4.109 and Strategy Support Measure 12 set out the potential for developing local urban energy 'smart-grids' based upon non-carbon fuels as a decentralised adjunct to centralised future decarbonised energy transmitted via the National Grid.

Such a step is essential in managing the shift to the Scottish Government's low carbon future, but at no point does the Glasgow and the Clyde Valley Strategic Development Planning Authority anticipate an energy supply system which is wholly decentralised or wholly centralised, but does recognise the need to diversify the energy generation mix and provide the strategic planning context for a low-carbon future with both centralised and decentralised energy supply in that mix.

The primary potential for such a mix and therefore which requires a land-use response is within strategic scale regeneration areas, Diagram 10 page 21, the Clyde Waterfront, the Clyde Gateway and where existing communities have been selected as part of a strategic growth agenda, the Community Growth Areas, Diagram 10 page 21.

To ignore that decentralised potential would be to ignore opportunities to introduce further low-carbon or non-carbon energy and so address climate change mitigation.

E58 Strathclyde Partnership for Transport

The proposed modification is noted by the Glasgow and the Clyde Valley Strategic Development Planning Authority but it would consider that the whole development strategy is predicated upon a reduction in emissions from transport and other key emitters.

Transport and the Shift to a Low-carbon Future

The need to reduce greenhouse gas emissions from transport modes is recognised by the

Glasgow and the Clyde Valley Strategic Development Planning Authority, paragraphs 4.102 and 4.103 and Background Report 06, as they comprise more than 25% of the city-region's emissions.

The Proposed Plan's Spatial Development Strategy for achieving a step-change in sustainable transport (Spatial Framework 1 'Competitiveness', pages 28 to 31) to service key development priorities is a direct response to that challenge.

Decarbonising the transport networks is already a fundamental of the Proposed Plan and underpins the whole Strategic Development Strategy.

E63 Hillhead Community Council

The representation is noted by the Glasgow and the Clyde Valley Strategic Development Planning Authority as a contribution to the debate on the energy paradigm shift from carbon-based energy to low or non-carbon sourced energy.

The Energy Paradigm Shift and the Proposed Plan

The energy paradigm shift is central to the Proposed Plan's long-term Spatial Vision and is addressed through the Spatial Development Strategy in its various components, e.g. sustainable transport, urban fabric change, natural resource development, 'smart-grid' development.

In terms of the city-region, the potential for tidal and wave power remains limited by the geography of the city-region and by the current position and investment in relevant technologies. Local power generation from rivers is not strategic in scale and is therefore an issue for local development planning.

Wind energy, whilst acknowledging its limitations and its potential for tensions with competing land uses, is addressed through the Proposed Plan in terms of strategic search areas to frame more detailed action at the local development plan level.

Biomass and its potential role in future energy generation in the city-region is highlighted in the Proposed Plan and will be taken forward by the local development plans and by action by key stakeholders to deliver a low-carbon future.

Reporter's conclusions:

The relationship between centralised and decentralised energy generation

1. Representation E57 expresses concern that the plan seems to express a presumption in favour of decentralised energy generation. It argues that there should be a mix of decentralised, distributed and large scale generation (including commercial scale renewables), in line with government policy.
2. The authority explains that its strategy is predicated on decarbonising centrally generated electricity, but that this has few land use implications. However, it wishes to draw attention to the potential for developing local urban energy smart grids, as an adjunct to centralised generation. The need for a diverse supply is recognised. A land use response is also required to promote that diversity within strategic scale regeneration areas.
3. I consider that the authority's approach should be clarified in the Spatial Vision chapter of the plan (see Issue 4) and the Spatial Framework section of the plan.

Transport and the shift to a low-carbon future

4. Representation E58 wishes the decarbonisation of transport to be prioritised and the

lower carbon emissions of public transport to be emphasised.

5. I am satisfied that the need to reduce greenhouse gas emissions from transport modes is adequately recognised in the plan, in particular paragraphs 4.102 and 4.103.

Energy paradigm shift

6. Representation E63 casts doubt on the green credentials of biofuels, considers that wind power is over-emphasised, and wishes to see more emphasis on power from tidal (rather than wave) and river sources.

7. Scottish Planning Policy expects onshore wind power development to continue, and a wider renewables mix to develop as technologies become commercially viable. Those technologies would include biofuels, wave and tidal power. It also acknowledges the scope for more small run-of-river projects, but these would not be strategic in scale and would therefore fall to local development plans to consider. In this context, I see no reason to recommend amendment to the plan in this respect.

Reporter's recommendations:

In Spatial Framework 4, introduce a new paragraph before paragraph 4.106 as follows:

“The proposed plan predicates its strategy on centralised energy generation companies moving to implement the substitution of non-carbon fuels and carbon capture and storage technology, once beyond prototype, in order to decarbonise centrally generated energy. It recognises the need to diversify the energy generation mix and provide the strategic planning context for a low-carbon future with both centralised and de-centralised energy supply in that mix.”

Issue 30	Infrastructure: Waste	
Development plan reference:	Spatial Development Strategy Spatial Framework 4 Infrastructure	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
E2/3 Peel Environmental Ltd. E53/4 SRG Estates		
Provision of the development plan to which the issue relates:	Paragraph 4.110 and Strategy Support Measure 13 (page 56)	
Planning authority's summary of the representation(s):		
<p>E2/3 Peel Environmental Ltd. Spatial Framework 4 does not appear to connect these infrastructure needs together i.e. 'energy' and 'waste disposal' and instead focuses on a narrow range of renewable energy technologies. As such, there is a need for a stronger link required between waste as an economic resource and its potential to deliver sustainable low carbon energy.</p> <p>There does not appear to be any connection between waste being recognised as a valuable economic resource and its potential to deliver sustainable low carbon energy and as such there needs to be a stronger link between these two aspects and the connection between them to be expressed explicitly within the Strategic Development Plan.</p> <p>E53/4 SRG Estates The Proposed Plan should make reference to this overarching policy context within Strategy Support Measure 13 and provide further elaboration on the broad principle, for example, of locating waste management land uses (such as waste to energy plants) at redundant sites such as former mineral and coal workings. Such sites can often present a significant opportunity in terms of accommodating future development in that they are not greenfield sites per se, are often extremely large, invariably can benefit from good access to the road network, often have rail access and, typically have well established structure planting surrounding the site. It is considered that SRG land at Broken Cross; Dalquhandy; Poniel; Happendon Wood; and Damside has the potential to accommodate such facilities.</p>		
Modifications sought by those submitting representations:		
<p>E2/3 Peel Environmental Ltd. Seek additional text to be added to paragraph 4.110, namely "Waste has a value as a resource through producing renewable energy in the form of electricity and heat from residual waste which cannot be reused or recycled and would otherwise end up in landfill. This can help to achieve renewable energy targets and meets the energy vision of the SDP."</p> <p>Seek additional text to be added to Strategy Support Measure 13 (after the first sentence), namely "The SDP will support the development of additional waste management facilities across the SDP area in order to meet the shortfall in operational capacity."</p>		

E53/1 SRG Estates

Seek additional text to be added to Strategy Support Measure 13 to include “other locations such as former mineral workings.”

Summary of responses (including reasons) by planning authority:**E2/3 Peel Environmental Ltd.**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification in that it considers that

- paragraph 4.110 of the Proposed Plan clearly recognises waste as an economic resource which can support the Vision of the Strategic Development Plan. Strategy Support Measure 13 recognises the potential for waste management facilities to be located where there exists an opportunity to maximise the potential for the re-use of waste heat.
- paragraph 4.111 of the Proposed Plan clearly recognises that, in order to meet the targets set out in the Zero Waste Plan, additional waste management facilities will be required across the Strategic Development Plan area and that that this is adequately referenced and recognised in the first sentence in Strategy Support Measure 13.

E53/1 SRG Estates

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification on the following grounds -

- Scottish Planning Policy paragraph 216 (Supporting Document 1) states that other locations such as former mineral workings should also be considered as being suitable for waste management facilities when allocating sites in the development plan.
- The Strategic Development Plan, in support of its Sustainable Development Strategy, gives preference to the provision of waste management facilities in industrial, and storage or distribution locations as set out in Scottish Planning Policy paragraph 216 Supporting Document 1).
- The Glasgow and the Clyde Valley Strategic Development Planning Authority considers that other possible locations, such as former mineral workings, can raise sustainability issues particularly in relation to accessibility and therefore that such locations and detailed site specific suitability for waste management facilities are considered to be a matter for consideration by the local planning authority. In the case of the five named locations the local planning authority would be South Lanarkshire Council.

Reporter’s conclusions:**Link between waste and energy generation**

1. Representation E2/3 contends that the potential for renewable energy, in the form of electricity and heat, to be produced from waste should be recognised in the plan.

2. The plan acknowledges waste as an economic resource which can support its vision. In response to a further information request, the authority has confirmed that this can include energy production. In the interests of clarity, this should be referred to in the text. The need for additional waste management facilities to meet the shortfall in operational capacity is recognised in the first sentence of Strategic Support Measure 13.

Location of waste management sites

3. Strategy Support Measure 13 sets out types of location where the development of waste management facilities will generally be acceptable. Representation E53/4 advocates that it should include a specific reference to the scope for waste management facilities at former mineral workings, in line with Scottish Planning Policy.

4. However, paragraph 216 of Scottish Planning Policy effectively gives two types of encouragement. It states that locations which “are appropriate for industrial, storage and distribution uses are also appropriate for many waste management installations”. With regard to locations such as former mineral workings, these “should also be considered when allocating sites in the development plan for specific waste management facilities” (my emphasis). That encouragement is followed by advice that, in keeping with the proximity principle, towns and cities will often be the best locations for such uses, and that accessibility will be a key consideration.

5. The authority’s approach recognises the above distinction by including only the former in its support measure. That does not, of course, rule out the allocation of sites for waste management facilities on former mineral working sites in local development plans.

6. The respondent has cited 5 of his client’s former mineral working sites as having potential for waste management uses. However, these are all located outside towns and cities, and the authority has questioned their sustainability and particularly their accessibility. A strategic plan is not the place to investigate the acceptability of these individual sites. That is for the local development plan.

Reporter’s recommendations:

Modify the last sentence of paragraph 4.110 to read:

“The SDP recognises waste as an economic resource which can support its vision, including as a source of energy production as well as supporting through Strategy Support Measure 13 the re-use of waste heat.”

Issue 31	Infrastructure: Water Environment	
Development plan reference:	Spatial Development Strategy Spatial Framework 4 Infrastructure	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
E60/5 Scottish Natural Heritage		
Provision of the development plan to which the issue relates:	Paragraphs 4.116 to 4.123 (page 58)	
Planning authority's summary of the representation(s):		
Consideration is required of the implications of sea level rise in the coastal zone as part of achieving Strategy Support Measure 14.		
Modifications sought by those submitting representations:		
Reference should be made in text to seas level rise in the coastal zone as part of achieving Strategy Support Measure 14.		
Summary of responses (including reasons) by planning authority:		
<p>The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification.</p> <p>Whilst not specially referenced in Strategy Support Measure 14 or related paragraphs (4.116 to 4.123) the Glasgow and the Clyde Valley Strategic Development Planning Authority considers that the context for monitoring issues relating to the water environment and flood risk, including that of the implications of sea level rise, has been set out in the Water Framework Directive, the Flood Risk Management Act (2009) and the Water Environment and Water Services (Scotland) Act 2003.</p> <p>Rising sea levels is just one of a number of issues affecting flood risk and water quality. The development of an integrated approach to flood risk management and water quality improvements has been taken forward and will be monitored as part of the River Basin Management Plans for Scotland (Supporting Document 1) and the Clyde area as well as the Firth of Clyde Marine Spatial Plan (Supporting Document 2). Therefore the Glasgow and the Clyde Valley Strategic Development Planning Authority consider therefore that specific reference to sea level rise is not required.</p>		
Reporter's conclusions:		
<p>Sea level rises in the coastal zone</p> <p>At present, the plan makes no direct reference to the implications of sea level rises in the coastal zone. Given the extent of the coastal zone within the plan area, its environmental</p>		

and economic importance, and its potential implications for strategic land-use, that omission should be rectified, as suggested in representation E60/5. The fact that other legislation and other types of plan also deal with this issue does not justify the omission.

Reporter's recommendations:

Modify Strategic Support Measure 14 by inserting after 'In order':

“to address the implications of sea level rises in the coastal zone and ...”

Issue 32	Infrastructure: Broadband	
Development plan reference:	Spatial Development Strategy Spatial Framework 4 Infrastructure	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
E7 Scottish Enterprise		
Provision of the development plan to which the issue relates:	New Issue Spatial Development Strategy Spatial Framework 4 Infrastructure page 54	
Planning authority's summary of the representation(s):		
<p>This representation raises a potential new infrastructure issue of significance to the economic competitiveness of the city-region.</p> <p>E7 Scottish Enterprise Scottish Enterprise considers that one particular area has increased in significance since the publication of the Main Issues Report and relates to improving digital connectivity.</p>		
Modifications sought by those submitting representations:		
<p>E7 Scottish Enterprise No specific modification sought.</p>		
Summary of responses (including reasons) by planning authority:		
<p>E7 Scottish Enterprise This objective of this representation is noted by the Glasgow and the Clyde Valley Strategic Development Planning Authority.</p> <p>Currently the spatial implications of this aspect of infrastructure are insufficiently understood and more work is required to integrate it into Strategic Development Plan. The Glasgow and the Clyde Valley Strategic Development Planning Authority recognises the potential contribution of improved broadband speeds and bandwidth to competitiveness within a low-carbon economy, to climate change mitigation and to environmental quality through reduction in the need to travel both internationally and nationally.</p> <p>However the Glasgow and the Clyde Valley Strategic Development Planning Authority also recognises the market context of de-regulation in this particular field and the limits on public sector intervention to develop capacity.</p> <p>As a result, the Glasgow and the Clyde Valley Strategic Development Planning Authority therefore recognises the need to enter into partnership with Scottish Enterprise, the private sector and public bodies to develop the spatial planning aspects of high-speed/high bandwidth broadband and its priorities with a view to future incorporation at the next review of the Strategic Development Plan.</p>		

Reporter's conclusions:
1. In view of the strategic development plan authority's stated intention to address the potential significance of broadband connectivity in the first review of the plan, and in the absence of any modifications to the plan being sought by Scottish Enterprise, I consider that this issue does not require to be addressed through this examination.
Reporter's recommendations:
No modifications.

Issue 33	Lack of Fisheries Policy	
Development plan reference:	New issue to the Strategic Development Plan	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
E17 James Graham		
Provision of the development plan to which the issue relates:	New issue	
Planning authority's summary of the representation(s):		
Addition of specific fisheries policy.		
Modifications sought by those submitting representations:		
Addition of a specific fisheries policy for the promotion, protection and development of the salmon and freshwater fisheries interests within the Clyde Salmon Fishery District.		
Summary of responses (including reasons) by planning authority:		
<p>The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification in that it considers that the Strategic Development Plan's commitment</p> <ul style="list-style-type: none"> • to protecting water quality • to enhancing biodiversity <p>through the provisions of the Green Network, the sustainable locations assessment, the Clyde Area Management Plan and the Metropolitan Glasgow Strategic Drainage Plan are sufficient to cover this issue in so far as it relates to strategic land use planning.</p> <p>Consequently the inclusion of a specific fisheries policy in Strategic Development Plan is not required.</p> <p>This matter was also considered as part of the Public Local Inquiry into the Glasgow City Plan 2, Objection Ref 67, (refer Supporting Document 1) and it is considered that the approach taken by the Glasgow and the Clyde Valley Strategic Development Planning Authority supports the Reporter's conclusions.</p>		
Reporter's conclusions:		
<p>1. The addition of a fisheries policy for the promotion, protection and development of the salmon and freshwater fisheries interests in the Clyde Salmon Fishery District would extend beyond the land use planning focus of the strategic development plan. As the authority points out, the plan's commitment to protecting water quality and enhancing biodiversity through the provisions of the Green Network, the sustainable locations</p>		

assessment, the Clyde Area Management Plan and the Metropolitan Glasgow Strategic Drainage Plan are sufficient to cover this issue insofar as it relates to strategic land use planning.

Reporter's recommendations:

No modifications.

Issue 34	Strategy Support Measure 15: Meeting Risk - Delivering the Spatial Development Priorities	
Development plan reference:	Spatial Development Strategy Spatial Framework 5 Strategic development priorities	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
E52/16 Mactaggart and Mickel (Homes) Ltd. E53/3 SRG Estates E53/4 SRG Estates E53/5 SRG Estates E54 Glasgow Housing Association		
Provision of the development plan to which the issue relates:	Spatial Framework 5 Strategic development priorities (page 60) Strategy Support Measure 15 (page 60) Diagram 20 (page 61)	
Planning authority's summary of the representation(s):		
<p>E52/16 Mactaggart and Mickel (Homes) Ltd.</p> <ul style="list-style-type: none"> • provide greater detail and clarity in terms of the 'Sustainable Economic Growth' requirement by providing a twin strategy with more of a focus on the short to medium term that closely reflect current and future market conditions. • plan strategically to provide for generous housing land supply to meet housing demand in full for both the private and affordable housing requirements • less reliance on high density and Urban Capacity sites and allow Local Development Plans to release effective housing sites allowing for the expansion of existing settlements that best suit local circumstances and support 'sustainable economic growth' in the short to medium term. • provide for a Twin Strategy' taking account of the short to medium term and place less reliance on the Community Growth Area's that will take longer to become effective, in the post recession period, as has been evident to date. <p>E 53/3, E53/4 and E53/5 SRG Estates Provision should be made for exceptions to Strategy Support Measure 15 where development of sustainable renewable energy locations does not undermine the Plan Vision, contributing to a low carbon economy.</p> <p>E54 Glasgow Housing Association Provision should be made for the inclusion of the Transformational Regeneration Area (TRA) programme across Glasgow as they are key strategic regeneration areas for the City and have been afforded National priority by the Scottish Government, a partner to the programme.</p>		
Modifications sought by those submitting representations:		
<p>E52/16 Mactaggart and Mickel (Homes) Ltd. Refer to the 'Sustainable Economic Growth' requirement in the Strategic Development Priorities page and reference it in Strategy Support Measure 15 and Diagram 20.</p>		

E53/3, E53/4 and E53/5 SRG Estates

The Strategic Development Plan should make allowance for exceptions to Strategy Support Measure 15 where the development of sustainable renewable energy locations does not offend and ultimately works towards the Plan Vision, contributing to a low carbon economy.

E54 Glasgow Housing Association

The Glasgow TRA programme should appear in detail as a single proposal within the Strategic Development Plan Priorities section.

Summary of responses (including reasons) by planning authority:**E52/16 Mactaggart and Mickel (Homes) Ltd.**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications on the basis that

- in a period where resources are both constrained and finite, it is even more important to focus on clear defined spatial priorities, to avoid increasing their number and distribution and to avoid their dilution and risk to their delivery.
- it is not appropriate to amend the overall strategy to create a 'de facto' 'twin Strategy which supports expediency in response to market fluctuations in demand where this may lead in the longer-term to a non-sustainable portfolio of development locations.
- sustainable economic growth does not mean any development. It is closely defined in Scottish Government publications (Supporting Document 1) and is a fundamental aspect of the Strategic Development Strategy and its risk approach (paragraph 4.124)
- the fundamental principles of the Strategic Development Plan require proposals to reflect the Spatial Development Strategy and support the Plan's Spatial Vision.
- any changes to the overall Spatial Development Strategy which could bring forward development proposals in non-sustainable locations, run counter to the Proposed Plan's Spatial Vision.
- In the context of housing development, the Strategic Development Plan, through Strategy Support Measure 10, already makes provision to support local flexibility, where it can exploit sustainable locations and where it is appropriate locally, in the period to 2020.

E 53/3, E53/4 and E53/5 SRG Estates

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications on the basis that

- the location of strategic sustainable renewable energy locations is adequately supported within the Proposed Plan
- in a period where resources are both constrained and finite, it is even more important to focus on clear defined spatial priorities, to avoid increasing their number and distribution and to avoid their dilution and risk to their delivery.

E54 Glasgow Housing Association

The Glasgow and the Clyde Valley Strategic Development Planning Authority recognises and welcomes the efforts devoted to regeneration and redevelopment by Glasgow Housing Association.

However, it rejects the proposed modification, in that

- it is also recognised that similar approaches are being undertaken across the city region by the other constituent local authorities.
- although the Glasgow TRA programme may carry national priority in investment terms, it is not a specific spatial national priority identified in National Planning Framework 2.
- it is considered that such projects are most appropriately incorporated within the relevant Local Development Plan, Local Housing Strategy and Housing Investment Programmes.
- paragraph 4.72 of the Strategic Development Plan Proposed Plan underpins and supports such activities.

Reporter's conclusions:

Twin growth strategies

1. Concerns regarding short- to medium-term growth are expressed in representation E52/16. These would be sufficiently addressed by the flexibility provided through Strategy Support Measure 10 and Diagram 4, with their accompanying text, as recommended to be modified. That approach would avoid compromising the plan's vision and strategy.

Renewable energy locations

2. I agree with the authority that the location of strategic renewable energy facilities is adequately supported within the proposed plan. Strategic Support Measure 15 supports the delivery of the development priorities listed in Schedule 14. It would not be meaningful to specify "exceptions" to that list. The support measure provides a test for proposed developments not on the list, namely that they should not run counter to the strategic direction of the plan.

Transformational Regeneration Area programme

3. Whilst the Glasgow Transformational Regeneration Area programme enjoys national priority for investment, it is not a spatial priority identified in National Planning Framework 2. Similar programmes are being undertaken by other agencies and these are more appropriately incorporated within local strategies, plans and programmes.

Reporter's recommendations:

No modifications.

Issue 35	Miscellaneous	
Development plan reference:	Diagram19: Metropolitan Glasgow Strategic Drainage Plan (page 57) Spatial Framework 4 Infrastructure: Water Environment (page 58)	Reporter: Malcolm Mahony
Body or person(s) submitting a representation raising the issue (including reference number):		
E16/1, E16/2 Scottish Water E43/1 Loch Lomond and the Trossachs Park Authority		
Provision of the development plan to which the issue relates:	Amendment to Diagram19 (page 57) Amendment to paragraph 4.121	
Planning authority's summary of the representation(s):		
<p>E16/1, E16/2 Scottish Water Changes to the definition of 'Metropolitan Glasgow Strategic Drainage Plan' in the Glossary and to the spelling of 'Shieldhall'.</p> <p>E43/1 Loch Lomond and the Trossachs Park Authority Specific reference of the Loch Lomond and the Trossachs National Park Authority in the list of stakeholders listed in paragraph 4.121</p>		
Modifications sought by those submitting representations:		
<p>E16/1 Scottish Water</p> <ul style="list-style-type: none"> seeking definition of Metropolitan Glasgow Strategic Drainage Plan' as contained in the Glossary to read 'A formal partnership project established between Glasgow City Council, Scottish Water, Scottish Enterprise and SEPA; incorporating The Scottish Government, GCVSDPA, British Waterways Scotland, Clyde Gateway Urban Regeneration Company and other local authorities, to address long-term investment in water and drainage infrastructure across the city-region core. It is included in National Planning Framework 2 by the Scottish Government as a national development.' <p>E16/2 Scottish Water</p> <ul style="list-style-type: none"> seek to correct spelling of 'Sheildhall' to be retyped 'Shieldhall'. <p>E43/1 Loch Lomond and the Trossachs Park Authority</p> <ul style="list-style-type: none"> seek specific reference of their organisation in list of stakeholders listed in paragraph 4.121. 		
Summary of responses (including reasons) by planning authority:		
<p>E16/1 and E16/2 Scottish Water The Glasgow and the Clyde Valley Strategic Development Planning Authority notes the proposed Scottish Water modifications.</p>		

E43/1 Loch Lomond and the Trossachs Park Authority

The Glasgow and the Clyde Valley Strategic Development Planning Authority considers reference to 'local authorities' in paragraph 4.121 was intended to cover all the local authorities involved in Clyde Area Management Plan process including the Loch Lomond and the Trossachs Park Authority.

Reporter's conclusions:

1. The modifications suggested relate to the glossary and to factual matters. These may be amended as the authority sees fit without reference to this examination, in accordance with section 18(3) and (4) of the Town and Country Planning (Scotland) Act 1997, as amended, and the associated regulations.

Reporter's recommendations:

No modifications.

Issue 36	Natura 2000 sites	
Development plan reference:	Spatial Development Framework 2: Environmental Action (pages 20,22,34)	Reporter: David Russell
Body or person(s) submitting a representation raising the issue (including reference number):		
E60/6, E60/7, E60/8, E60/9 Scottish Natural Heritage		
Provision of the development plan to which the issue relates:	Reference to Natura 2000 sites within the Proposed Plan	
Planning authority's summary of the representation(s):		
<p>E60/6 E60/7 E60/8 E60/9 Scottish Natural Heritage In relation to Strategy Support Measure 1 (page 20) (E60/6), Strategy Support Measure 2 (page 20), (E60/7), Strategy Support Measure 3 (page 22) (E60/8), Strategy Support Measure 8 (page 34) (E60/9)</p> <p>The Habitat Regulations Appraisal prepared by the Glasgow and the Clyde valley Strategic Development Planning Authority identifies proposals for further assessment at the Local Development Plan level.</p> <p>However, it is considered that the inclusion of a specific caveat within Strategy Support Measures 1, 2, 3 and 8 will ensure that further assessment at the Local Development Plan level is carried out for such proposals and that appropriate mitigation measures are secured at the Local Development Plan level.</p> <p>This inclusion would be consistent with the advice contained in Circular 1/2009 and also Scottish Natural Heritage's guidance of which reference is made in paragraph 10 of that Circular.</p>		
Modifications sought by those submitting representations:		
<p>E60/6 Scottish Natural Heritage In Strategy Support Measure 1 (page 20), the Strategic Development Plan should include the following wording to implement the findings of the Habitat Regulations Appraisal at the Local Development Plan level for <i>"Clyde Valley Woods Special Area of Conservation versus Carluke/Wishaw Community Growth Area, to be in accordance with this development plan, and as part of the Local Development Plan process, any proposal likely to have a significant effect on a Natura site, either alone or in combination with other plans or projects should be subject to an appropriate assessment. Appropriate mitigation should be identified where necessary to ensure that the development plan will not adversely affect the integrity of a Natura site."</i></p> <p>E60/7 Scottish Natural Heritage In Strategy Support Measure 2 (page 20) the Strategic Development Plan should include the following wording to implement the findings of the Habitat Regulations Appraisal at the Local Development Plan level for <i>"The Strathleven Corridor including the Lomond Canal</i></p>		

and the Clyde Waterfront Metropolitan Flagship Initiative and the Lomondgate Strategic Economic Investment Location versus the Endrick Water, To be in accordance with this development plan, and as part of the Local Development Plan process, any proposal likely to have a significant effect on a Natura site, either alone or in combination with other plans or projects should be subject to an appropriate assessment. Appropriate mitigation should be identified where necessary to ensure that the development plan will not adversely affect the integrity of a Natura site"

E60/8 Scottish Natural Heritage

In Strategy Support Measure 3 (page 22) the Strategic Development Plan should include the following wording to implement the findings of the Habitat Regulations Appraisal at the Local Development Plan level for *"Black Cart versus Glasgow International Airport, Clyde Valley Woods Special Area of Conservation versus Larkhall South Strategic Economic Investment Location and Inner Clyde Special Protection Area versus Clyde Gateway and Erskine Riverfront Strategic Economic Investment Location, to be in accordance with this development plan, and as part of the Local Development Plan process, any proposal likely to have a significant effect on a Natura site, either alone or in combination with other plans or projects should be subject to an appropriate assessment. Appropriate mitigation should be identified where necessary to ensure that the development plan will not adversely affect the integrity of a Natura site."*

E60/9 Scottish Natural Heritage

In Strategy Support Measure 8 (page 34) the Strategic Development Plan should include the following wording to implement the findings of the Habitat Regulations Appraisal at the Local Development Plan level for *"Inner Clyde Special Protection Area versus Green Network at Port Glasgow, to be in accordance with this development plan, and as part of the Local Development Plan process, any proposal likely to have a significant effect on a Natura site, either alone or in combination with other plans or projects should be subject to an appropriate assessment. Appropriate mitigation should be identified where necessary to ensure that the development plan will not adversely affect the integrity of a Natura site."*

Summary of responses (including reasons) by planning authority:

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects these modifications on the basis that

- their repetitive nature and the level of detailed prescriptive text is inappropriate for a Strategic Development Plan which is designed, in line with the legislation and spirit of the new Scottish Planning system and the Scottish Government's desire for a culture change in Planning, to be a concise and visionary document.
- 'Natura 2000' sites have a high level of European Union legislative protection which local planning authorities need to reflect in their Local Development Plans. It is therefore unnecessary to reiterate that protection and to repeat the same caveat four times within the Proposed Plan. Local Development Plans, under this legislative stricture, require to implement the necessary protection and to identify any necessary mitigation measures associated with development.

The Glasgow and the Clyde Valley Strategic Development Planning Authority notes Scottish Natural Heritage's concern at the lack of express reference to Natura 2000 sites within the body of the Proposed Plan and accepts the principle of finding a proportionate approach to this issue. The Glasgow and the Clyde Valley Strategic Development Planning Authority has sought to liaise with Scottish Natural Heritage to

this end, but has not reached a resolution in the time available to meet the published deadline (its Development Plan Scheme) for submission of the Proposed Plan to the Scottish Ministers.

Reporter's conclusions:

1. In response to requests for further information, Scottish Natural Heritage has confirmed that it has now withdrawn its representation relating to this issue, except with regard to the Glasgow International Airport Zone strategic economic investment location and the Black Cart special protection area. Both parties confirmed that they now agree that a modification in that regard should be made to Schedule 2, to confirm that the Natura tests would be applied to that proposed development.

2. I accept that such a modification would be appropriate.

Reporter's recommendations:

1. Modify Schedule 2 by adding a double asterisk after 'Glasgow International Airport Zone (Airport plus 3 sites)'; and inserting an associated footnote to the schedule to read:

“ ** In light of the habitats regulations appraisal, development proposals are required to demonstrate that they would not adversely affect the Black Cart special protection area. “