

Objector: Clydebelt
Objection: 32M
Policy: CD2

STATEMENT OF CASE - Objection: 32M for the November 2003 Public Local Inquiry on the Clydebank Local Plan

1. Background

Clydebelt is dedicated to retaining and enhancing our heritage and the Green Belt status of the Kilpatrick Hills and their surrounding environment in Clydebank, Dumbarton, Milngavie, Bearsden and Glasgow. Clydebelt is concerned with other undeveloped areas nearby, including the north bank of the River Clyde, and in the "villages" of Old Kilpatrick, Dalmuir, Duntocher, Hardgate, Faifley, Drumchapel, Craigton, Carbeth, Gartocharn, Jamestown, Bonhill, Milton and Bowling. Clydebelt tries to influence public policy, on planning, access etc.

Clydebelt supports the proposed Local Plan's provisions for protection of green spaces, and objects to only a few points. Clydebelt is opposed to the other maintained objections on the preference for housing development on brownfield land, and on the use of the term wildlife corridors, and seeking to remove 4 sites from Green Belt and identify them for housing.

2. Location

This objection relates to locations within the Clydebank Local Plan area, but outwith the Town Centre, on which there may be proposals for retail developments. There is currently an example of such a planning application at the Faifley Knowes site that is zoned for recreation in the existing adopted Local Plan, and is proposed as open space in the Final Plan now under consideration.

3. Policies in Local Plan

Modification 40 of Policy CD2 *Retail Developments Outwith the Town Centre*, p45, and the further modification notified in a letter dated 15 July 2003.

4. Maintained objections

Policy CD2 on Retail Developments outwith the Town Centre has clearly been derived from the sequential approach to site selection advised by NPPG8 *Town Centres and Retailing* (eg paragraphs 12-16, 38, 45, 89), as well as the corresponding section 11.54 of the *Glasgow & Clyde Valley Joint Structure Plan*. Clydebelt did not object to policy CD2 as in the Final Plan. However we object to the inclusion of Modification 40.

The wording of Modification 40 is not grammatically or logically correct, there being no verb in it. This makes it impossible to understand the exact nature of the point, which could lead to adverse implementation. Starting with the opening phrase of the Policy, this proposed new point would read as "Proposals for retail developments in an out of centre location and detached from the defined Town Centre, will only be supported when it can be satisfactorily demonstrated that the contribution the development would make to remedying any quantitative or qualitative deficiencies in the existing retail provision".

However our objection continues, assuming that the bullet point means something like:

- the development would contribute to remedying any quantitative or qualitative deficiencies in the existing retail provision.

The new point appears to have been derived from NPPG8 para 45 point (d): "tackle deficiencies in qualitative or quantitative terms which cannot be met in or at the edge of the town centre".

We object to Modification 40 as being more permissive than NPPG8 para 45 point (d). “Remedying any” would be easily claimed by any applicant. “Remedying significant” would be far more suitable. “Deficiencies in the existing retail provision” concerns current provision, whereas “cannot be met in or at the edge of the town centre” is more fundamental and concerns the potential capability of the land. We believe that there should be consistency in terminology and meaning with the more primary progenitor policy of NPPG8.

The requirements of national policy would be covered better by being closer to the text of NPPG8 para 45 point (d). We propose “the development would remedy significant deficiencies in qualitative or quantitative terms which cannot be met in or at the edge of the town centre”.

We also argue that the proposal of one new point of Modification 40 is too selective an adding of points from NPPG8, and that if this is added then so should others which are not adequately mapped to the 8 bullet points of Policy CD2 (or Schedule 6(c)ii) of the Structure Plan), such as

e) not run counter to the Government's integrated transport policy. Locations for major growth and travel generating uses, including retail and commercial leisure developments, should be easily and safely accessible by a choice of means of transport providing a network of walking, cycle and public transport routes, which link with the forecast catchment population, in addition to the car. Consideration should be given to whether the development would have an effect on travel patterns, car use and air pollution

g) address at the developer's expense the consequences to the trunk and local road networks of the generated and redistributed traffic resulting from the development proposal. In certain circumstances the impact may not be restricted to junctions and road lengths adjacent to the development

i) not threaten or conflict with other important policy objectives e.g. green belt, urban regeneration, the loss of good quality industrial or business sites; or where priority is being given to the reuse of vacant or derelict land, the development should, in all other respects, provide an appropriate location for the proposed development

and

j) not affect adversely local amenity;

The further modification notified in a letter dated 15 July 2003, “there are no sites available or likely to become available within a reasonable time to accommodate the proposal in the town centre or in an edge of centre location”, does seem to be founded on national and regional policy to enhance town centres, eg NPPG8 paragraph 12, and the sequential tests of the Structure Plan.

Documents that may be cited

- SPP1 *The Planning System 2002*
- Planning Advice Note: PAN 59 *Improving Town Centres*
- NPPG8 *Town Centres and Retailing*
- *Designing Places*, Scottish Executive 2001
- *Glasgow and the Clyde Valley Joint Structure Plan 2000 - 2003*
- Clydebank Local Plan, adopted 1994
- Clydebank Local Plan, List of Proposed Modifications, 2003

Potential Witnesses

One or two members of Clydebelt with experience of Retail Provision.