

## Renfrewshire Council

To: **Planning and Economic Development Policy Board**

On: **22nd January 2008**

**Report by  
Director of Planning & Transport**

### **GLASGOW AND THE CLYDE VALLEY JOINT STRUCTURE PLAN 2006 THIRD ALTERATION – PROPOSED MODIFICATIONS**

#### **1. Summary**

1.1 On 30 November 2007 The Scottish Government issued the modifications which it proposes to make to the Glasgow and the Clyde Valley Joint Structure Plan 2006 Written Statement (Structure Plan 2006). In accordance with statute an opportunity has been given to those with an interest in the Structure Plan to make objections to the proposed modifications. The period for making objections ends on 25 January 2008. The Glasgow and the Clyde Valley Joint Structure Plan Committee met on 18 January 2008 to agree its response. This report reviews the proposed modifications which are significant to Renfrewshire and expresses support for the response made by the Glasgow and Clyde Valley Structure Plan Joint Committee. In addition, it also recommends that the Scottish Government should modify the Structure Plan in respect of the designation of the Braehead Shopping and Leisure Centre.

#### **2. Recommendations**

2.1 It is recommended that the Council submit this report as its formal response to the Scottish Government's proposed Modifications to the Glasgow and the Clyde Valley Joint Structure Plan 2006 – Third Alteration, expressing support for the response made by the Glasgow and the Clyde Valley Joint Committee in respect of the Proposed Modifications and identifying its concerns over one aspect of retail policy relating to the Braehead Shopping and Leisure Centre outlined in paragraphs 3.24 – 3.28 below.

#### **3. Background**

##### **Structure Plan**

3.1 Renfrewshire Council acts in partnership with seven other councils around Glasgow, under the Glasgow and the Clyde Valley Structure Plan Joint Committee (G&CVJSP), to prepare the Structure Plan for the area. The

Structure Plan 2006 was submitted to the Scottish Government in April 2006. The Planning and Development Policy Board approved reports on the Structure Plan 2006 at the meetings of 8 February 2005; 9 August 2005; and 10 January 2006. The Glasgow and the Clyde Valley Joint Structure Plan Committee approved its response to the Proposed Modifications to the Structure Plan 2006 at the meeting of 18 January 2008. The Director of Planning and Transport has had detailed discussions with the Structure Plan Manager and agreed the responses made in the report to the Joint Committee with the exception outlined below.

- 3.2 The Structure Plan 2006 sets out a 20 year planning and development strategy for Glasgow and the Clyde Valley. It encompasses a wide range of planning issues and provides a framework for the preparation of Local Plans (in future, Local Development Plans). It is a key document in setting the future development context for the supply of land for development including housing, industry and retailing and through this provides the strategic planning framework for the provision of infrastructure including transport, water and sewerage.
- 3.3 The Scottish Government has published the draft modifications which it proposes to make to the Plan. Information on these is provided on the Council's web site ([www.renfrewshire.gov.uk](http://www.renfrewshire.gov.uk)) and the documents are available on the Structure Plan Joint Committee's web site ([www.gvcvcore.gov.uk](http://www.gvcvcore.gov.uk)). A period of 8 weeks extending to 25 January has been set aside to allow interested parties to make objections to the Plan. The Scottish Government set out 78 proposed modifications, many of which are minor grammatical or typographic changes. This report comments only on those proposed modifications which are significant and of direct relevance to Renfrewshire.

### **Community Growth Areas (CGAs) / ROF Bishopton**

- 3.4 Of particular importance for Renfrewshire is the identification of 13 Community Growth Areas (CGAs) across the Structure Plan area. Two of these are located in Renfrewshire, Royal Ordnance Factory (ROF) Bishopton with an indicative capacity of 2500 dwellings and Johnstone South-west with an indicative capacity of 500. The proposed Community Growth Area at ROF Bishopton attracted a substantial level of opposition and formal objection from Bishopton residents. As a result, the Scottish Government held an Examination in Public (EiP) in April and May 2007. The purpose of the EiP was to provide additional information for the Scottish Ministers to assist them reaching a decision on the Structure Plan 2006. A copy of the report on the EiP has been issued along with the proposed Modifications and is also available on the Structure Plan Joint Committee web site.

### **Report on Examination in Public**

- 3.5 The EiP was undertaken to provide additional information on two matters relating to the proposed designation of the ROF Bishopton site as a Community Growth Area, namely:
1. Do either the presence of contamination within the former Royal Ordnance Factory site at Bishopton, or the measures required for its remediation, raise issues of sufficient concern to preclude the identification of Bishopton as a Community Growth Area?
  2. Does the capacity of the road and rail network preclude the identification of Bishopton as a Community Growth Area?

The EiP report extends to 92 pages and covers a range of detailed matters. The reporter's findings and conclusions will be taken into account in the course of determining the planning applications relating to the Community Growth Area at ROF Bishopton.

- 3.6 The report on the EiP concludes, in respect of contamination and remediation that, *"there is no evidence that there is contamination on the ROF site that raises issues of sufficient concern to preclude identifying Bishopton as a CGA. There is also no evidence that the "measures required" for the remediation of the site will give rise to issues of sufficient concern to preclude its identification."*
- 3.7 In respect of transport, the Reporter concludes that, *"there are transport capacity issues that ought to be addressed in order for such a CGA at Bishopton to proceed"*. The report considers that implications for the local road network and improvements to station infrastructure, and their timing, are local issues that can be assessed in the context of planning applications for the ROF site. However, it states that the M8 east of junction 29 already experiences congestion, that it is logical to conclude that, unless capacity is improved, congestion will increase in future years, irrespective of a CGA at Bishopton; and that it is also logical to conclude that a CGA at Bishopton would make congestion worse. The report regards it as desirable for this situation to be avoided. In relation to the capacity of the rail network, it concludes that some services to and from Bishopton are already oversubscribed, that this ought to be addressed, irrespective of the development of a CGA at Bishopton, but that a CGA is likely to increase pressure at peak times and make overcrowding worse. It is regarded as desirable that this situation is also avoided.

In relation to these matters, the report notes that measures to increase capacity on the M8 are under consideration in the context of the Strategic Transport Projects Review, that a rail rolling stock strategy is being formulated for the purchase of additional rolling stock for the period 2009-2014, and that the outcome of these considerations is expected to be known in 2008 and 2008/2009 respectively. It concludes that, in both cases, it is reasonable to expect the terms in which the Third Alteration is approved to influence the

prioritisation and allocation of funding and that it is unrealistic to expect funding to be committed before, or at the time, the plan is approved. Given that the Third Alteration envisages that a CGA would be developed to contribute to development needs primarily in the period to 2018, it is concluded that there would be an opportunity for capacity issues to be addressed and that, as matters stand, the capacity of the road and rail network does not preclude the identification of Bishopton as a Community Growth Area.

However, the report recommends that the Third Alteration ought to make clear that the development of a CGA at Bishopton will be contingent on transport capacity constraints being satisfactorily addressed. It should also record that the principle of a new motorway junction at Bishopton has been accepted.

3.8 The Report recommends the following changes to the Third Alteration:

*(1) to make clear that it encompasses all the matters listed in the subsequent bullet points, the second sentence in paragraph 8.14 is changed to refer to “Requirements, including for supporting infrastructure and services....”.*

*(2) for clarity, and to be consistent with Scottish Ministers’ policy, “satisfactory” is inserted before “treatment” in the fourth bullet point in the paragraph.*

*(3) the following text should be inserted after the final bullet point in paragraph 8.14 “In the case of Bishopton, while the principle of a new motorway junction has been accepted, the development of a Community Growth Area will also depend on capacity problems on the M8 to the east of Bishopton being satisfactorily addressed and on improvements to rail capacity”.*

3.9 The Scottish Government’s Proposed Modifications incorporate these recommended changes through Proposed Modifications 10, 11 and 13 respectively. These relate to Paragraph 8.14 which sets out the requirements to be addressed in master plans which are to be prepared to provide planning frameworks for the development of CGAs. In addition to the above recommended changes the Scottish Government also propose an additional modification, Modification 12, the insertion of an additional bullet – “An assessment of landscape carrying capacity”.

3.10 Proposed Modifications 10 and 11 (see 3.8(1) and (2) above) serve to clarify the text of the Structure Plan 2006 and these have been accepted by the Joint Structure Plan Committee. In respect of Proposed Modification 12, “landscape carrying capacity” is not a term which is included in National Planning Policy or advice and no methodology has been issued by the Government on this. The Joint Committee has therefore sought clarification of the meaning of the term.

- 3.11 The Joint Structure Plan Committee has expressed reservations and recommended changes to Proposed Modification 13 which embodies recommendation 3 from the Report on the EiP as described in paragraph 3.8(3) above.
- 3.12 The need to resolve problems of congestion on the M8 and the need to ensure that rail capacity continues to meet demand for travel is accepted. The reporter is correct in identifying these matters as issues which require to be addressed and indeed these matters are already identified in the Structure Plan 2006 eg:
- *In Schedule 3(b) "Airport – Tunnel – Glasgow City Centre" is identified as a Priority Transport Corridor for the management of travel demands.*
  - *In Schedule 4 (iv) "Improvements to the M8 between Junctions 26 and 29 (in particular), and access roads to Glasgow International Airport" is identified as a Road Scheme under Strategic Transport network – Development proposals.*
  - *Paragraph 8.22 identifies a number of gaps in external transport links and specifically refers to "Glasgow International Airport Access: rail link committed. At this stage any commitment to the upgrading of the M8 between Junctions 26 and 29 will depend on the outcome of further studies."*
  - *Paragraph 9.19 identifies the M8 between Junction 26 and 29 as one of three schemes "needed to fill recognised gaps in the Strategic Road Network which will have a significant impact on the competitiveness of the metropolitan area over the twenty-year period." Paragraph 9.19 third bullet states "M8 between Junctions 26 and 29 - improvements to the junctions that serve this stretch of motorway and related access roads are critical to ensuring improved accessibility by road to Glasgow International Airport. The potential for improvements to this part of the Strategic Road Network therefore need to be safeguarded as set out in Schedule 1(e).*
  - *Schedule 1(e) identifies "Glasgow International Airport Rail Link" and "M8 West Upgrade" as a "Joint Transport Priority to be safeguarded and investigated." It is anticipated that the implementation of the Glasgow Airport Rail Link will improve rail service to and from Bishopton by increasing the number of trains to Paisley and thereby reduce demand on the Glasgow Wemyss Bay line between Glasgow and Paisley.*
  - *In Paragraph 9.22 the Structure Plan 2006 states:- "Other road schemes are recognised as strategic priorities in government policy but still require detailed evaluation and assessment. These are also identified in Schedule 4(iv) and include the capacity of the M8 between Junctions 26 and 29."*

- Paragraph 11.21 under the heading “International Transport Facilities” states:-  
*“Economic competitiveness also depends on the effectiveness of the international transport network and docks, rail freight facilities and road links. The completion of the M74, M8 and M80 and provision of more effective public transport links to Glasgow International Airport are of particular significance in ensuring the continued competitiveness of the Structure Plan area. It is also important to maintain and improve the quality of access to the airport from the M8.”*

- 3.13 Clearly the Structure Plan provides extensive recognition, of the need to improve the M8 between Junction 26 and the City centre and the rail service to the Airport and includes policies which promote and seek to secure necessary improvements. It should also be recognised that ROF Bishopton is not unique in being a Community Growth Area whose development is in part dependent on longer term infrastructure improvements.
- 3.14 As can be seen from the references cited in 3.12 above, one of the aims of the Structure Plan 2006 is to identify future strategic land requirements and to include policies to influence and direct infrastructure development to support the requirements of the Structure Plan. The Report on the EiP recognises this where it states that it is reasonable to expect the approved Structure Plan *“to influence the prioritisation and allocation of funding”* (Paragraph 5.84). The Structure Plan already includes extensive policy coverage relating to improvements along the transport corridors which serve ROF Bishopton. These policies are included not solely to secure adequate transport provision for the ROF Bishopton Community Growth Area but to provide for transport demands which will arise from a wide range of development proposals and changes in transport arrangements including:-
- The expansion of Glasgow International Airport
  - Development at Renfrew Riverside / Braehead
  - The de-tolling of Erskine Bridge
  - Proposed development at Inverclyde
    - Housing expansion incorporated in Approved Ayrshire Structure Plan and associated additional traffic arising from improvement of A737 which is included as a proposed modification to the Structure Plan 2006.
    - New development proposals throughout Renfrewshire which will access Glasgow using the Paisley Glasgow rail route and M8
    - Proposed Community Growth Area at Johnstone South-West
- 3.15 It is also worth noting that the National Planning Framework for Scotland 2 (NPF 2) – Discussion Draft, which was issued in January 2008, identifies Glasgow Airport Enhancement as one of nine National Developments which are considered to be essential to the delivery of the spatial strategy set out in the Framework. In respect of transport requirements to support the Airport Enhancement, NPF 2 states *“Provision for access to the airport by public transport will be significantly improved with the completion of Glasgow Airport Rail Link (GARL). Improvements will be needed to Junction 28 of the M8*

*before 2015 to accommodate projected increases in road traffic". It also states that the action programme for NPF 2 will specify how, when and by whom national developments will be taken forward. The need for improvements to rail infrastructure on the Glasgow – Ayr/Gourock line and to the M8 between junctions 26 and 29 are therefore recognised as national planning priorities.*

- 3.16 The basis for the Reporter's recommendation (3) and the resultant Modification Number 13 is given in paragraphs 5.50 – 5.87 in the Report on the EiP. This makes clear that Transport Scotland, the trunk road authority *"considers that, as matters stand, there is no evidence that capacity issues that would preclude designating Bishopton as a CGA could not be addressed."* The Report also states that, *"As the Third Alteration envisages that a [Community Growth Area] would be developed to contribute to development needs primarily in the period to 2018, there would be an opportunity for capacity issues to be addressed."* The Reporter is correct in reaching this conclusion.

However, whilst the conclusions of the Report on the EiP are welcomed Recommendation 3 and the resultant proposed Modification 13 does not acknowledge the fact that the transport capacity issues which will affect the development of the Bishopton CGA are already recognised in the Structure Plan and does not directly assist in increasing the priority which should be attached to securing the required infrastructure improvements.

- 3.17 Another issue arises from the fact that Paragraph 8.14, to which it is proposed to append the additional text in question, comprises a list of criteria to be applied to all CGAs. Adding a specific reference to ROF Bishopton is not considered to be appropriate. The Joint Structure Plan Committee has therefore recommended that the text proposed for insertion should be relocated to the later paragraph 8.15, which refers in detail to certain CGAs. It has also recommended that an additional sentence be inserted to make clear the related transport policy. The modification as approved by the Joint Structure Plan Committee therefore reads:-

*"In the case of Bishopton, while the principle of a new motorway junction has been accepted, the development of a Community Growth Area will also depend on capacity problems on the M8 to the east of Bishopton being satisfactorily addressed and on improvements to rail capacity. Strategic Policy 4 specifically makes provision for these enhancements."*

- 3.18 The Joint Structure Plan Committee also recommends alterations making specific reference to development priorities identified in the Structure plan which will depend on improved accessibility on the M8 and the Ayr / Inverclyde rail corridors. The recommended changes are :-

In paragraph 9.16 (Page 38) add, after “Diagram 12”.

*“These priorities are required to provide the necessary long-term rail and road capacity enhancements which are necessary to support the Metropolitan Development Strategy and its Agenda for Sustained Growth”.*

In paragraph 9.19 (page 40) – third bullet point entitled “M8 between Junctions 26 and 29” – amend to read

*“M8 between Junctions 26 and 29 – improvements to the general capacity of this stretch of motorway, to the junctions that serve it, and to related access roads, are critical to ensuring improved accessibility to strategic developments in the western conurbation, such as Riverside Inverclyde, Bishopton ROF, and Glasgow International Airport. The potential for improvements to this part of the Strategic Road Network therefore need to be safeguarded as set out in Schedule 1(e)”*

- 3.19 These proposed changes are acceptable to the Council and serve to clarify the implications of the conclusions and recommendations of the Reporter to the EIP.

3.20 **Other Modifications**

Other proposed Modifications worthy of note are:-

3.21 **Modifications 20 and 21 – A73 Improvement**

The Scottish Government propose to add A737 Improvement to Schedule 4(iv) which lists Strategic Transport Network Development Proposals. This proposed improvement was identified in the Ayrshire Structure Plan and in the Decision Letter related to that plan, the Scottish Government stated that improvements would have to be determined through an appraisal process which will include a STAG Appraisal. The Council is not aware of such an appraisal having been undertaken and the Joint Committee have asked that reference be made to this in the final decision letter.

3.22 **Modifications 26 Land raising and flooding**

SEPA made objections over references to land raising in Paragraph 10.4. In recognition of this, Proposed Modification 26 restricts land raising only to “where it is consistent with the need to concentrate development in the priority development and regeneration areas encompassed by the Metropolitan Flagship Initiatives; the Guiding Principles of Sustainable Development; and Strategic Policy 9.” Whilst land raising should not be seen as an easy solution to avoidance of flood risk it is a legitimate aspect of flood prevention particularly when used in combination with other sustainable prevention and mitigation measures. The Joint Structure Plan Committee has recommended that the modification be changed to allow for a more flexible approach to land raising whilst continuing to require it to conform to Structure Plan policy.

3.23 Modification 33 Erskine High Amenity Location

Modification 33 moves the Hewlett Packard site at Erskine from “Nationally Safeguarded Single User” designation to “Regionally Important”. This reflects the Scottish Planning Policy (SPP) 2. This has been accepted by the Joint committee.

3.24 Modifications 54 and 55 – Renewable Energy

Structure Plan 2006 identified 5 potential areas of search for windfarm developments. None of these was located within Renfrewshire. Modification 54 will alter the Structure Plan so that the key diagram now refers to potential areas of search for significant windfarms. This is to bring the Structure Plan into line with Scottish Government policy on the development of renewable energy sources set out in SPP 6. Under the modified text, opportunities for smaller scale windfarms outwith the search areas, will be permissible subject to assessment of constraints and environmental impacts among other things. This change will, in principle allow for smaller scale windfarm development within Renfrewshire. As this is in accordance with Government policy the change has been accepted by the Joint Committee.

**Issue not covered by Proposed Modifications – Designation of Braehead Shopping and Leisure Centre**

- 3.25 The proposed modifications do not address an issue of particular concern to Renfrewshire, the designation of the Braehead Shopping and Leisure Centre.

Out-of Centre Retail Designation / Commercial Centres

- 3.26 The Structure Plan does not accord with Scottish Planning Policy 8 (SPP 8) *Town Centres and Retailing* in respect of the designation of Commercial Centres. These were introduced in SPP 8, published in August 2006, some 4 months after the submission of the Structure Plan 2006 to the Scottish Ministers for their approval. The submitted Structure Plan 2006 therefore does not fully reflect the SPP8 in this important new planning designation. In particular the Braehead Shopping Mall is afforded a specific designation as a “Shopping and Leisure Centre” under Schedule 6(c)(iii) of the Structure Plan. It is considered that Braehead Shopping and Leisure Mall would clearly fall within the definition of a “Commercial Centre” under SPP 8. Renfrewshire Council hold the view that the scale, content and wider proven regeneration impacts of the Braehead Shopping & Leisure Centre defines it well, as a Commercial Centre – unique amongst the other retail facilities listed in Schedule 6(c)(iii).
- 3.27 The modifications proposed by the Scottish Government make some changes to the Structure Plan based on SPP 8, see for example Draft Modifications 42 and 67. However the Draft Modifications do not address the inconsistency between the Structure Plan’s designation of Braehead Shopping & Leisure Mall as a “Shopping & Leisure Centre” in Schedule 6(c)(iii) and the new

designation of “Commercial Centres” in SPP8. This could well lead to problems of consistency in the preparation of the local development plan, in determining planning applications, and at planning appeals. It is acknowledged that the Structure Plan Manager is currently undertaking a consultation, as part of the early preparation of the next structure plan (Strategic Development Plan) relating to retailing and town centres, this plan is unlikely to be published however before 2011/12. Given the very significant and fast developing nature of retail provision in Renfrewshire, it is suggested that the position and formal designation of Braehead be clarified before that date. The Modification process provides an opportunity for the Scottish Government to ensure consistency between the Structure Plan 2006 and SPP8 on this matter, with respect to Braehead.

- 3.28 **It is recommended that the Scottish Ministers should modify the Structure Plan 2006 to provide appropriate designation of “Commercial Centres” in accordance with SPP 8 relative to the Braehead Shopping & Leisure Mall, currently identified as a Shopping & Leisure Centre under Schedule 6(c)(iii).**

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### **Implications of this Report**

- 1 **Financial Implications** – As the Structure Plan provides a strategic framework for the development of the Council area it will have implications for the finance s of the Council at a strategic level and over the longer term.
- 2 **Personnel Implications** - None
- 3 **Community Plan Implications**  
  
Social inclusion - None  
  
Modernising government - None  
  
Sustainable development – The Structure Plan provides the strategic planning framework for the Council area and therefore is a key policy document in securing sustainable development.
- 4 **Legal Implications** - None
- 5 **Property Implications** - None
- 6 **Information Technology Implications** - None
- 7 **Equal Opportunities Implications**- None