



GLASGOW and
the CLYDE VALLEY
strategic development
planning authority

30th January 2014

Mr Kevin Stewart, MSP
Convener
Local Government and Regeneration Committee
The Scottish Parliament
Edinburgh
EH99 1SP

Dear Mr Stewart

PROPOSED NATIONAL PLANNING FRAMEWORK 3 - CALL FOR VIEWS

Introduction

Submission on behalf of the Glasgow and the Clyde Valley Strategic Development Planning Authority which it is hoped will assist the Committee in its scrutiny of the Proposed National Planning Framework 3.

The GCVSDPA welcomes the publication of the Proposed National Planning Framework 3 (NPF3) and the opportunity to set out its views to the Committee.

Glasgow and the Clyde Valley Strategic Development Planning Authority

The Glasgow and the Clyde Valley Strategic Development Planning Authority (GCVSDPA) comprises the eight local authorities of East Dunbartonshire, East Renfrewshire, Glasgow, Inverclyde, North Lanarkshire, Renfrewshire, South Lanarkshire and West Dunbartonshire Council who work together for strategic development planning purposes.

The principal role of the GCVSDPA is to prepare and maintain an up to date Strategic Development Plan (SDP) for the city region.

The first SDP was approved by Scottish Ministers in May 2012 and sets out a sustainable development strategy over the next 20 years of where new development should be located and a policy framework to help deliver sustainable economic growth, shape good quality places and enhance the quality of life in the Glasgow and the Clyde Valley city region.

The SDP focuses on growing the economy of the city region in a low carbon and sustainable manner by setting out a planning framework which positively encourages investment within Glasgow and the Clyde Valley. The GCVSDPA considers a key role of the SDP is to support the Scottish Government's Economic Strategy (September 2011) and related strategies in particular it's Regeneration Strategy 'Achieving a Sustainable Future (November 2011) which recognises the key role the NPF in supporting regeneration outcomes.

Glasgow and the Clyde Valley City Region

The National Planning Framework is intended to be the spatial land use and infrastructure expression of the Scottish Government's Economic Strategy and in that context the GCVSDPA considers that the Proposed NPF3 as currently drafted underplays the contribution that the Glasgow and the Clyde Valley city region can make to the future prosperity of Scotland.

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Whilst the role and contribution of cities and their wider city regions is acknowledged in the document it is considered that this could be significantly strengthened in terms of their potential to meet the Scottish Government's outcomes for planning namely improving the quality of life and place, enhancing the natural environment and supporting economic growth and the translation to a low carbon economy.

This is particularly the case in respect of the GCV area which given its size (a third of Scotland's population), its contribution to Scotland's GVA (a third of Scotland's total GVA) and the scale of the issues and challenges it faces, with appropriate prioritisation of resources, it can make an increased and significant contribution to the Scottish Government's planning outcomes by accelerating the economic recovery and support employment through:

- the reuse of the highest levels of vacant and derelict land in Scotland (GCV 43% of Scotland's total);
- delivery of a significant part of the Central Scotland Green Network;
- delivery of the Metropolitan Glasgow Strategic Drainage Plan which will deliver sustainable water management on a significant catchment scale;
- investment in GCV's Strategic Economic Investment Locations, which will support the Scottish Government's key economic sectors namely renewable energy, financial and business services, biosciences, the creative industries, tourism and recreation;
- the delivery of three of Scotland priority regeneration priority areas, Clyde Gateway, Clyde Waterfront, and Ravenscraig with resulting social, economic, environmental and health benefits for many of Scotland's most deprived communities as identified in the Scottish Index of Multiple Deprivation;
- investment in Glasgow City Centre as Scotland's most important retail centre, with a significant conference and tourism offer.

In this context it should also be recognised that the '*spatial priorities for change*' areas identified in NPF3 are very different in respect of the issues they face and their ability respond to the current economic conditions and as such the document should set out which are the priority areas for public sector investment. Indeed the lack of a sense of priority between the '*spatial priorities for change*' areas potentially undermines the long term effectiveness of the document.

In this context the GCV SDP's '*Sustainable Development Strategy*' is based up a Development Corridor which runs west to east through the city region paralleling the River Clyde and the M8 corridor to Edinburgh. This Corridor provides the opportunity to achieve multiple objectives whilst at the same time reducing the carbon footprint of the city-region by

- reconnecting its communities with the river, and connections north and south of the river;
- generating large-scale economic activity within easy reach of these communities;
- maximising the opportunity for sustainable travel between home and work;
- developing increased development densities;
- recycling and reusing brownfield land;
- developing more critical mass to lower the unit cost of infrastructure, public transport and services.

Within this Corridor there are a number of key locations including Glasgow City Centre, Clyde Waterfront, Clyde Gateway and Ravenscraig and it is considered that NPF3 should expressly make reference to this Development Corridor and its key components as this would add value to the document by tying it into the approved SDP.

It is considered that through this greater alignment of the NPF and the SDP along with the appropriate prioritisation of resources that the Glasgow and the Clyde Valley city region can significantly contribute to long term prosperity of Scotland.

National Development - Glasgow International Airport

In terms of the Strategic Airport Enhancements National Development the recognition of the vital role played by airports as gateways to Scotland is welcomed. In terms of Glasgow International Airport the omission of any reference to improvements to surface access, which was specifically made in the Main Issues Report is disappointing given the joint work currently being undertaken by Glasgow City Council, Renfrewshire Council, Strathclyde Partnership for Transport, Transport Scotland and Glasgow International Airport into this important strategic issue.

National Development - Ravenscraig

The designation of Ravenscraig as a National Development recognising that the *"redevelopment of this site for a range of uses will make a significant contribution to addressing concentrations of vacant and derelict land in Central Scotland"* is welcomed. However the omission in the National Development description of the provision of a new town centre as previously set out in the NPF3 Main Issues reportR undermines the important strategic role of this location.

The new Town Centre, operating at a sub-regional scale, is an integral element of the regeneration of the site with a key strategic role, formally recognised at a regional level since the *"Glasgow and the Clyde Valley Joint Structure Plan 2000, First Alteration- Spring 2003, Ravenscraig- Strategic Planning Role"* was proposed and approved, following a decision at the House of Lords in 2006.

Within the successor Glasgow and the Clyde Valley Strategic Development Plan Spatial Development Strategy (approved May 2012) it is stated that *"Ravenscraig's essential strategic role is to drive forward long-term regeneration and restructuring of the southern area of the North Lanarkshire conurbation and provide a new central focus and new urban centre for Motherwell, Wishaw and their surrounding smaller communities. Effectively, this key project is to create a mixed-use regeneration opportunity for the post-industrial economy of that part of Glasgow and the Clyde Valley."*

Ravenscraig Town Centre's inclusion within the Strategic Development Plan's Network of Strategic Centres, recognises and supports its important role in providing a new urban focus and diverse range of services reflective of the needs of the population of the new sustainable settlement, Motherwell/Wishaw corridor and the wider region.

The retention of the development description contained in the NPF3 Main Issues Report or the inclusion of wording which more accurately reflects the scale and type of development, particularly the role of the Town Centre, which is expected and required to achieve these aims would be welcomed by the GCVSDPA.

General

There are also a number of general issues which the GCVSDPA would wish the Committee to consider in particular the need for NPF3 to

- clearly set out the long term demographic context for Scotland in particular in relation to the challenges around an ageing population;
- set an appropriate national context for housing recognising the high level of supply that currently exists and the need to focus on making this supply deliverable;
- set out how the NPF is to link into the SOA and Community Planning Partnership processes;
- ensure alignment with other Government investment strategies and policy frameworks e.g. National Transport Strategy, Regeneration Strategy, Economic Strategy, Infrastructure Investment Plan, Zero Water Plan and to ensure that these strategies and frameworks are kept up to date.

Thank you for considering the contents of this letter as part of your scrutiny of NPF3.

Yours faithfully



Stuart Tait
Manager