PROPOSED SOUTH LANARKSHIRE LOCAL DEVELOPMENT PLAN – MAY 2013

CONSULTATION RESPONSE BY CAMBUSLANG COMMUNITY COUNCIL

SUMMARY

We object strongly to the proposed development priorities for housing in Cambuslang which involve releasing greenbelt land for housing in the areas of Gilbertfield Road and Lightburn Road as well as any further proposals beyond the current settlement edge. We insist that there should be no further incursions into the Green Belt.

We are deeply concerned at the deterioration of Cambuslang town centre and request South Lanarkshire Council to draw up a Town Improvement Plan, involving full consultation with local people and businesses, which can provide a basis for regeneration and investment.

We urge a strong and specific commitment to investment in sustainable transport and the development of Green Networks in Cambuslang.

In the light of concerns relating to housing, economic development and sustainability in Cambuslang, we urge South Lanarkshire Council to undertake a fuller local consultation – involving public meetings – to discuss the future strategic direction of the development of Cambuslang.

INTRODUCTION

Cambuslang Community Council welcome the opportunity to comment on the Proposed Local Development Plan. We appreciate the work undertaken by South Lanarkshire Council (SLC) officials in preparing the Plan, as well as the preceding Main Issues Report and associated documents.

This response to the consultation on the Plan is based on a preliminary discussion at a meeting of Cambuslang Community Council on 21 May 2013 and a full discussion of the Plan at a meeting on 18 June 2013. It addresses three main issues of concern in the Plan relating to housing development, the state of the town centre and investment in sustainable transport and Green Networks, as well as the need for fuller engagement with the community.

SPATIAL STRATEGY AND HOUSING DEVELOPMENT

We object strongly to the proposed development priorities for housing in Cambuslang which involve releasing greenbelt land for housing in the areas of Gilbertfield Road and Lightburn Road. as well as any further proposals beyond the current settlement edge. We insist that there should be no further incursions into the Green Belt.

The Proposed Local Plan designates 'residential masterplan sites' in Gilbertfield Road and Lightburn Road for housing. These are to be released from their current Green Belt designation to allow residential development for an unknown number of housing units. This appears to be a continuation of the 2009 Local Plan strategy which requires Cambuslang/Rutherglen (and three other major settlements) to accommodate the majority of future housing demand in South Lanarkshire. Our objection to the proposals for housing development is based on four factors: piecemeal erosion of the Green Belt; lack of amenity greenspace; flood risk; and pressure on local infrastructure.

1. Piecemeal erosion of the Green Belt

The Proposed Local Plan defends incursions into the Green Belt on the grounds of high pressure for housing development and the need for consideration to be given to "limited settlement expansion". The supplementary volumes to the Main Issues Report indicate that SLC has investigated four sites for housing development – at Greenlees Farm, East Greenlees Road, Lightburn Road/Gilbertfield Road, Cathkin Road – collectively covering some 56 hectares and with provision for at least 600 housing units. Of these, Gilbertfield Road and Lightburn Road are included in the Proposed Local Plan, although the Greenlees Farm site is judged to "accord with the strategy, with mitigation".

This continues the pattern seen in previous local development plans. The 2009 Local Plan stated that a "great number of sites have been highlighted to the Council as potential development opportunities" but that only a "small number of sites" were identified as appropriate Green Belt releases, including Cairns Road.

The unwillingness of SLC to maintain a long-term, secure Green Belt boundary to Cambuslang, in the face of developer pressure, is not acceptable. Under current Scottish Planning Policy, greenbelt designation is intended to provide "certainty on where development will and will not take place" and "boundaries identified in local development plans should reflect the long-term development strategy". SLC's local development planning approach, releasing piecemeal sites for development in the Green Belt, is providing neither certainty nor a long-term approach. In these circumstances, SLC's commitment to a "robust settlement edge" is highly questionable. Such piecemeal erosion of the Green Belt also runs counter to the policies of Scottish Natural Heritage.

2. Lack of amenity greenspace

As the Proposed Local Plan notes, development proposals are meant to include "open space, green infrastructure and landscape provision", yet development proposals in the Proposed Local Plan (and its predecessors) have been put forward without obvious consideration of amenity greenspace.

According to SLC's own assessment of South Lanarkshire's settlement profiles, Rutherglen/ Cambuslang has one of the worst provisions of amenity greenspace in the local authority area (see table below); other parts of South Lanarkshire have more than double the amenity greenspace relative to population.

New housing developments in Cambuslang have recently included minimal investment in new parkland, sports facilities or other amenity green space beyond relatively small-scale play areas. Some developments have seen existing greenspace eroded (e.g. Holmhills Park, Richmond Park, Halfway Park) without compensating provision of replacement open space – as required under Scottish Planning Policy. There are also examples from Drumsagard and Holmhills of developers not delivering on their commitments to maintain greenspace or provide agreed facilities.

Amenity greenspace in South Lanarkshire

| Settlement | Amenity green space |
|------------------------|------------------------------|
| | Hectares per 1000 population |
| Lanark | 5.8 |
| Strathaven | 5.8 |
| East Kilbride | 5.0 |
| Uddingston | 4.3 |
| Larkhall | 3.1 |
| Hamilton | 3.0 |
| Blantyre/High Blantyre | 2.8 |
| Rutherglen/Cambuslang | 2.5 |
| Carluke | 2.0 |

Source: SLC Draft Greenspace Strategy 2010, Appendix 1

3. Flood risk

SLC's own assessment of development site to the south of Cambuslang up to the East Kilbride Road and Cathkin indicate flood risk and the need for mitigation. Previous developments in this area have been associated with the destruction of field drains and inadequate drainage provision. During high rainfall, springs appear at the edge of fields, and water run-off exceeds the capacity of the drains to cope on Greenlees Road and surrounding streets. This will only get worse given the predicted impact of climate change on western Scotland involving higher levels of precipitation and more bursts of heavy rain.

4. Pressure on local infrastructure

The level of housing development in Cambuslang and Newton is putting increased pressure on local roads, notably Greenlees Road, Westcoats Road, Brownside Road and Hamilton Road which are suffering from traffic congestion. Many local schools appear to be nearing full capacity.

ECONOMY AND REGENERATION

We are deeply concerned at the deterioration of Cambuslang town centre and request South Lanarkshire Council to draw up a Town Improvement Plan, involving full consultation with local people and businesses, that can provide a basis for regeneration and investment.

Cambuslang is classified as a Neighbourhood Centre in the Plan which states that it "is important to preserve the retail function of these centres". Yet, Cambuslang town centre is visibly declining in terms of the diversity of retail outlets, the number of unlet units, the eyesore of the derelict former cinema/bingo hall, a disproportionate number of fast-food outlets, and problems such as lack of parking. Using the terminology of Scottish Planning Policy, a 'health check' of the town centre would indicate serious problems of vitality and viability. The granting of out-of-centre planning permission for major new stores, (Sainsbury's, Aldi), while welcome in terms of employment, are likely to reduce further the viability of retailers on the Main Street.

Cambuslang urgently needs a Town Improvement Plan that takes a strategic view on the development of the Main Street encompassing not just retailing but other potential uses that will bring more people to the town centre as well as addressing the specific problems.

ENVIRONMENT

We urge South Lanarkshire Council to make a strong and specific commitment to investment in sustainable transport and the development of Green Networks in Cambuslang.

The Proposed Local Plan refers to the importance of green networks and the promotion of active travel (walking, cycling) – which are also important objectives of Scottish Planning Policy and the Glasgow and Clyde Valley Structure Plan. The Proposed Local Development Plan has development priorities associated with community growth and residential development which include commitments to ensuring Green Network provision in Hamilton, Ferniegair, Larkhall, East Kilbride, Carluke, Blantyre, Uddingston, Biggar, Lesmahagow, Coalburn and Rutherglen.

By contrast, there are <u>no</u> obvious or specific commitments for investment in green networks for Cambuslang. SLC has drawn up a map of aspirational Green Networks, but these have not been translated into practice. It has major green resources in the form of the River Clyde, two major parks, and smaller park or green areas, as well as the nearby Cathkin Braes and Dechmont Hill but they are insufficiently exploited or linked together. Also, Cambuslang has almost no on/off road cycle networks in the town, despite the potential offered by the national cycle routes to the north (N75: Cambuslang-Uddingston) and south of the town (NCR 756: East Kilbride-Rutherglen).

A priority for green networks in Cambuslang should include:

- (a) linking the town to the River Clyde, through for example a 'green boulevard' joining the Main Street to the Clyde Walkway as part of the Hoover site redevelopment, and reserving greenspace close to the river for potential environmental/leisure uses; and
- (a) developing a network of green links for safe walking/cycling between Cambuslang Park and Holmhills Park across Greenlees Road, links between the two parks and the NCR 75 and NCR 756, and access routes to primary and secondary schools in the area.

More generally, the Local Plan lacks a high-level commitment to active travel. The Local Plan identifies the implications of climate change but does not have a strategic commitment to sustainable transport beyond referring to the need for development to make best use of public transport. Active travel through walking and cycling is mentioned only in passing.

FURTHER CONSULTATION ON THE DEVELOPMENT OF CAMBUSLANG

In the light of concerns relating to housing, economic development and sustainability in Cambuslang, we urge South Lanarkshire Council to undertake a fuller local consultation – involving public meetings – to discuss the future strategic direction of the development of Cambuslang.

This consultation on the Proposed Local Development Plan meets SLC's minimum obligations for local development planning under Scottish Planning Policy. However, for ordinary people in Cambuslang, the Plan is not easy to read and it is difficult to draw out the implications for the town. The Plan is based on a Main Issues report, plus supplementary annexes, and refers to a range of other SLC plans and a hierarchy of legislation, and national and strategic policy and guidance, including the complex set of documents comprising the Glasgow and Clyde Valley Structure Plan.

Other Councils in Scotland take a more pro-active approach to consultation, involving public meetings with individual communities to explain the basis and implications of proposed local development plans, and allowing local people to understand fully what is involved and to participate actively in the development planning process.

The above concerns relating to housing, economic development and sustainability in Cambuslang indicate fundamental dissatisfaction with the current state of the town and its prospects. Following on from this consultation, we urge SLC to arrange public meetings to allow the people of Cambuslang to engage fully in the development of local development planning objectives and investment priorities which will affect their future standard of living and quality of life.