



CAMBUSLANG Community Council

RESPONSE TO CONSULTATION ON THE SOUTH LANARKSHIRE LOCAL DEVELOPMENT PLAN SUBMITTED BY CAMBUSLANG COMMUNITY COUNCIL

May 2017

Introduction

This is the response of Cambuslang Community Council (CCC) to the consultation by South Lanarkshire Council (SLC) on the Main Issues Report and associated documents for the South Lanarkshire Local Development Plan. It is based on meetings and discussions by Community Council members as well as feedback from the community following a call for comments (on the CCC website, Facebook and Twitter). It also incorporates views expressed by the local community at a public meeting organised by CCC (attended by over 120 people), in the form of a question time hustings with Cambuslang West candidates, on 24 April 2017.

In addition to the comments below, please take account of the following:

- The CCC response to the SLC consultation on the proposed Local Development Plan, May 2013. The specific objections made apply also to the current consultation;¹
- The Cambuslang Community Survey 2015 (CCS 2015), the largest community survey in Scotland, which sets out the priorities of the local community;²
- The Cambuslang Business Survey 2017 (CBS 2017), of businesses in Cambuslang town centre, which sets out their priorities for the future of the town.³

Specific references will be made to these documents throughout our response.

Question 1- Spatial strategy

Spatial strategy and objectives (3.1). We **recommend** modifying the vision statement to read as follows, with new words highlighted: *'To promote the continued growth and regeneration of **all parts of** South Lanarkshire by seeking sustainable, **inclusive and balanced** economic and social development within a low carbon economy whilst protecting and enhancing the environment'*.

Currently, there is a public perception that the focus on growth in South Lanarkshire is centred on the main centres – East Kilbride, Hamilton and Lanark. The regeneration of other centres, notably Cambuslang, appears to have a much lower priority – if indeed it is a priority at all. There is no obvious consideration of territorial balance in development across South Lanarkshire. There is no area strategy or masterplan for Cambuslang, despite it being the fourth largest town in South Lanarkshire, and the same probably applies to other smaller towns in the local authority area.

¹ <http://cambuslang-net.webs.com/>

² <http://www.cambuslangcommunitycouncil.com/wp-content/uploads/2014/05/Cambuslang-Community-Survey-Report-final3.pdf>

³ <http://www.cambuslangcommunitycouncil.com/wp-content/uploads/2014/05/Cambuslang-Business-Survey-final.pdf>



You will be aware that addressing spatial inequality, the promotion of town centres, and ensuring a local approach to regeneration, are important objectives of Scottish Government policy; this needs to be reflected in the vision and strategy of the Local Development Plan.

Policy 1 (3.5 and 4.3). We **disagree** with the current spatial strategy; we consider it to be fundamentally flawed because of its selective focus on sites for **new** business/industrial development rather than including the need for investment and regeneration of **existing** centres. Cambuslang is a case in point.

The proposed priorities for development relating to Cambuslang are either outside Cambuslang (Clyde Gateway), on the periphery of the area (Newton) or outside the town centre (Bridge Street/Somervell Street). There is no recognition of the importance of development or other regeneration investment that goes beyond planning issues. Further, for those sites proposed for development (economic or residential), there is no consideration as to how these would affect, relate to, or potentially strengthen the existing town centre of Cambuslang. In essence, it is difficult to understand how this could be called a 'spatial strategy' insofar as it is little more than a hierarchy and listing of development sites without recognition of how they fit together and connect as part of a wider strategy for the area.

We **recommend** that the spatial strategy is reworked to present a more *strategic* and *integrated* spatial approach to development and regeneration that includes recognition of the need to strengthen existing centres as well as make provision for new sites for investment.

We **support** the objective of "continued support and safeguarding of town, neighbourhood and village centres and the identification of appropriate development opportunities, in accordance with town centres first principle" but it must be meaningful and implemented in full – see comments on Policy 8 below.

Policy 3 – Green Belt and Rural Area. Supplementary Guidance 2 (Green Belt and Rural Area) states that part of the purpose of the Green Belt is to "protect and enhance the quality, character, landscape setting and identity of towns and cities" and that "the cumulative erosion of the Green Belt's integrity should be avoided". This policy is not being applied in Cambuslang – indeed, the reverse is the case. Successive housing developments to the south of Cambuslang along Greenlees Road, Greenlees Road and Lightburn Road have progressively eroded the Green Belt around Cambuslang. Developers clearly believe that further erosion up to East Kilbride and beyond can be achieved, given the applications CR/001, CR/002, CR/003, CR/004 and CR/006 submitted (discussed further below). We **recommend** that SLC make a formal public statement as part of the LDP2 that no further infringement of the Green Belt around Cambuslang will be accepted.

Policy 8: Strategic and town centres. We **disagree** with the proposal for Policy 8 to remain unchanged for three reasons.

First, the existing LDP has a passive approach to existing town centres. The current LDP has a general commitment to "safeguard and enhance" existing urban areas (LDP 2015, 3.25), yet the only specific commitments made apply exclusively to the three strategic centres (LDP 2015, 4.12 and Table 5.3). For other town centres, including Cambuslang, there are no specific commitments, and the only (generic) objective is related to planning: "ensure they continue to provide shopping facilities that meet consumer expectations of choice and quality" (4.13).

Second, SLC has failed to implement this generic objective in Cambuslang, specifically:

- Cambuslang Main Street fails to meet consumer expectations of choice and quality, in terms of the range of retail services, their viability and accessibility – see CCS 2015 and CBS 2017, which provide public and business evidence;
- SLC has not undertaken the promised 'Health Check' (LDP 2015, p.22) or sought consultation with local stakeholders to discuss this (this also applies to Policy 10);
- SLC has not fulfilled its commitment to assess development proposals in terms of their impact on the "role and function" of Cambuslang (LDP 2015, 4.15);

- Cambuslang is the only settlement of a significant size to be excluded from the application of the Place Standards Tool as part of the preparation of the Place Standard report.

Third, the current policy approach does not comply with Scottish Government policy. The SG 2011 regeneration strategy 'Achieving a sustainable future' sets out a clear vision and plan for its implementation, requiring putting communities first; a holistic approach; a long-term vision for places; integration of neighbourhood development into wider economic strategies; tailored interventions to link economic opportunity and worklessness; alignment of funding; strong leadership; and partnership working. The Scottish Government Town Centre Action Plan is also clear on how these principles need to be applied to town centres adopting the 'town centre first' principle.

None of this is reflected, with respect to Cambuslang, in LDP 2015, and we are concerned that the reference to the town centre first principle in the proposed LDP will only be paid lip service.

We **recommend** amendment of Policy 8 to align it with Scottish Government policy, including a commitment to implementing the priorities of the 2011 regeneration strategy and Town Centre Action Plan. Specifically, we request the development of a long-term vision for Cambuslang, developed in partnership with the local community, its integration into wider SLC economic strategies, and the tailoring of interventions and alignment of funding to meet the specific needs and priorities of Cambuslang.

Policy 11 – Economic Development and Regeneration. We **disagree** with the proposal for Policy 11 to remain unchanged.

We consider that there is a pressing need for a spatially targeted economic development and regeneration initiative for Cambuslang. The town centre improvements recommended above can only succeed if they are part of a wider regeneration strategy for Cambuslang. You will be aware of the significant area of datazones in Cambuslang (central Cambuslang, Caledonia Circuit, Whitlawburn, Eastfield, Silverbank) which are in the bottom 15% of SIMD and in the bottom 20% for health indicators. The cumulative and persistent disadvantages of these areas can only be tackled with an integrated regeneration strategy of the type currently being implemented in the Clyde Gateway area.

We **recommend** that SLC makes representations to its local authority partners and Scottish Government: (a) to extend the eastern boundary of Clyde Gateway eastwards on both sides of the river Clyde to include the datazones noted above; and (b) to provide Clyde Gateway with additional resources to address the long-term regeneration problems of Cambuslang. Should this not be accepted, we recommend that SLC develops an alternative regeneration strategy for Cambuslang.

Question 5 – Development Framework sites and Residential Masterplan sites

Residential Masterplan sites

We **support** the statement by SLC under the 'Call for Sites' (2.17) as it applies to Cambuslang: *"The Council has made it clear from the outset that there is currently no requirement to provide further land for residential development across South Lanarkshire."*

There has been extensive residential development in the Cambuslang area for two decades, but with insufficient regard to road infrastructure and the increase in traffic on local roads, parking provision at Cambuslang station, and the pressure on public services (such as schools and GP services). There has also been insufficient investment in the town centre to ensure that the Main Street benefits from people moving into the area. The successive development of new housing estates along Greenlees Road and East Greenlees Road has created large residential areas that are increasingly remote from public transport and completely unserved by shops or health services, requiring residents to travel by car for almost every purpose; this runs completely counter to SLC's stated vision of "sustainable economic and

social development within a low carbon economy” and is certainly not “protecting and enhancing the environment”.

Development Framework Sites - Bridge Street/Somervell Street, Cambuslang

We **support** the development of this ‘stalled site’ subject to seeing and approving the proposed masterplan and subject to the following:

- (a) Retail uses that would compete with the Main Street should be ruled out now. As noted above, the viability of the Main Street is under severe threat, as CBS 2017 demonstrates, and all consideration of retailing and development issues in the area should focus on how to strengthen the viability of the Main Street and enhance the range of retail outlets. With respect to any development on Bridge Street/Somervell Street, the design of walkways etc should seek to maximise access to, and use of, the Main Street.
- (b) A park and ride for Cambuslang railway station is essential. As noted, the steep rise in station usage has been associated with commuter parking in local car parks and streets close to the station, taking up parking spaces that could be used by shoppers and thereby (due to the lack of parking) damaging the viability of Main Street businesses.
- (c) We welcome the proposed connection to a woodland path and cycle route. Please liaise with your SLC Countryside Access colleagues (Simon Pilpel) on this, as they have been working with us and CamGlen BikeTown (Healthy n Happy Community Development Trust) on a cycle path along the south bank of the Clyde from Cambuslang Bridge to Dalmarnock Bridge, and with an attractive ‘gateway’ to route at Cambuslang Bridge. A feasibility study and plans have been drawn up and should be included in any masterplan proposal.

Other development sites

We **recommend** that the new LDP recognises the planned development of Clyde Cycle Park on the site to the north of the former Hoover site, and bounded by the river, Bogleshole Road and Dale Avenue. The site, owned by Scottish Enterprise and known as ‘Site 22’, is intended to be developed as an amenity/leisure/sports facility for road-race cycling and related sports activities, as well as an active travel hub. A Scottish Charitable Incorporated Organisation (SCIO) has been set up (known as Clyde Cycle Park Cambuslang), chaired by Cambuslang Community Council and involving South Lanarkshire Council, South Lanarkshire Leisure & Culture, Healthy n Happy Community Development Trust and East Kilbride Road Club. An option to acquire the site is being negotiated with Scottish Enterprise and an application for outline planning permission will be submitted thereafter. SLC Countryside Access (Simon Pilpel) and SLC Economic Development (Ken Meek) can provide further details.

Question 7 – Settlement boundaries and greenspace

We are deeply concerned at the erosion of greenspace and green network in the Cambuslang area. Continuous change of settlement boundaries, without sufficient recognition of local views and the strength of community concern/opposition (e.g. Gilbertfield, where over 1300 objections were submitted) has caused major public disquiet and distrust of SLC, especially where the approach to implementing planning procedures and rules has been controversial and questionable (e.g. Gilbertfield, Holmhills Park).

Further, there is insufficient consideration of the cumulative effect of development sites on road traffic and services. The development proposals below would add more than 1,000 additional housing units, on top of the massive wave of house-building that has already taken place to the north and south of Cambuslang Main Street over the past two decades without significant investment in local services, roads, parking, access to public transport or new accessible greenspace

We **recommend** that the settlement boundary of Cambuslang should be fixed and no further infringement or erosion of greenspace and the green network should be permitted.

Specifically regarding the sites listed in Technical Report 2:

- **CR02/001.** We **object** strongly to this proposal. The southern boundary of Cambuslang is already moving towards East Kilbride Road and should on no account cross the dual carriageway for the reasons set out in the SLC assessment. The Green Belt boundary must remain fixed.
- **CR02/002, CR02/003 and CR02/004.** We **object** strongly to each of these proposals for the reasons set out in the SLC assessment. They would surround Kirkhill Golf Club, which would be under pressure to sell the land to developers. These housing developments are increasingly remote from services, disconnected from Cambuslang Main Street and would increase traffic flow, congestion and air pollution on Greenlees Road as all access to local stations, shops and services would be by car.
- **CR02/006.** We **object** strongly to this proposal. Development of this site would further erode the green belt and increase traffic congestion on local roads. The disposal of the former golf club would provide an opportunity to extend Cathkin Braes Park and provide additional publicly accessible green space; as noted in our response to the 2015 LDP, Cambuslang currently has the second lowest provision of greenspace in South Lanarkshire.

In addition, we **recommend** strengthening the protection for existing greenspace in the Cambuslang area, and specifically to include the following green spaces as part of the green network.

- Douglas Park (at the corner of Stewarton Drive and Douglas Drive);
- Cambuslang Golf Club.

Policy 18 – Green Network. There is no specific question in the LDP2 consultation regarding Green Networks. However, we **recommend** that SLC consider developing a new Strategic Network Area (as defined in Supplementary Guidance 8) that seeks to protect, enhance and link up greenspaces in the area Rutherglen-Burnside-Cambuslang-Halfway. The north of this area is bounded by the River Clyde green corridor and the south by Cathkin Braes, while the centre has a string of parks running west to east from Richmond Park, through Overtoun Park, Holmhill Wood Community Park, Cambuslang Park to Halfway Park (as well as a number of other informal greenspaces). With judicious management, new street planting and signposting, these areas could be linked together creating a new strategic green network area.

Question 17 – Local nature reserves

We **support** the proposed designation of part of Holmhill Wood Community Park (please note the full proper name) as a Local Nature Reserve. However, we **recommend** that the boundary of the LNR is extended to include other parts of the park, and specifically the woodland area at Langlea Grove which is not included in the map on p.40 of the draft LDP - as proposed by Friends of Holmhill Wood Community Park. In particular, the woodland area was a critical wildlife area of the park before Cathkin High School was built in the middle of it. It is still rich in bird species, home to deer and has been the subject of extensive community volunteer action to ensure it is maintained and improved; as such it should be subject to the protection/classification of LNR designation.

We also **support** the LNR designation for the site at Westburn Road.

Question 19 – Travel and Transport

Although not asked as a question, we **recommend** strongly that SLC transport planning accelerates plans for the development of a park-and-ride facility at Cambuslang Station to relieve increasing pressure on local parking – see above comment to Question 5.

Cambuslang Community Council

11 May 2017