

Director of & Economic Planning and Environmental Services
West Dunbartonshire Council
Council Offices
Rosebery Place
Clydebank G81 1TG
Fax 01389 862414

Dear Sir,

Tesco Supermarket, Hardgate, application no. DC02/113

I am writing on behalf of Clydebelt to object to the above application for a retail development at Hardgate on Faifley Knowes, on the following grounds:

ENVIRONMENT & NATURE CONSERVATION

Environmental considerations lead to our major objections. Although there are many considerations on which we can be certain at this stage, comments on this application cannot be satisfactorily complete, or decided by members, without consideration of an Environmental Statement, including a full wildlife survey, which does not seem to have been submitted.

A guiding principle of the recently adopted Glasgow & Clyde Valley Joint Structure Plan 2000 is that *the risk of blight or loss of environmental resources caused by the excessive allocation of land for development should be minimised* (Table 3). This unnecessary development (see below) would be such an excessive allocation.

The guiding principles of the Structure Plan *explicitly recognise the importance of environmental resources, and the protection and enhancement of natural and ... environmental resources is a prerequisite of the Development Strategy* (12.4). We strongly support the need for planning to protect the environmental heritage of the area and to sustain and enhance the natural heritage. This proposal threatens nature conservation, both at the construction stage and when fully occupied, putting undue pressure on the existing valued diversity of animals, birds and plants, which we believe includes Butterfly Orchid and (without the benefit of a full wildlife survey) perhaps an endangered species, the Water Vole.

We consider that rejecting this application complies with the Structure Plan aims to resist *pressure for ...the development of urban green spaces* (4.4) such as this one, and *promote the creation of a Green Network, as encouraged by NPPG14, (5.13) to enhance the amenity and quality of life within and around towns and villages* (5.3). This site is very close (about 300m) to Green Belt and the Kilpatrick Hills and, together with the burn and surrounding gardens, forms part of a wild life corridor from Green Belt to the north and east and through the Duntocher Burn to the south. In Clydebank Local Plan 1994 Cochno Dam was incorporated into the Green Belt to help to maintain this green finger between Hardgate and Faifley, and the proposed new Clydebank Local Plan 2001, in Policy E2, requires *... protecting other areas of importance to nature conservation including ... Wildlife Corridors*. This site should therefore be retained for its value as part of a Wildlife Corridor and Green Network.

OPEN SPACE

NPPG11 guides councils to safeguard open spaces for recreational use. This site is designated in the current Clydebank Local Plan as open space for public recreation, so should not be built on. The Clydebank Local Plan 2001 upholds the same policy, with the following detailed considerations:

- Policy R1, Retention of Open Space, presumes *against development which affects the use of, or alters the character or amenity of areas of open space.*
- The location map identified this area as open space, some of which should be covered by Policy R2, Open Space Provision, to provide *open space as an integral part of the proposal.*
- Policy R5 requires Access Opportunities to *encourage pedestrian, cycle and horse riding access* etc.

This area proposed for development is very close to the only open space linking the designated Green Belt around the north west of Glasgow to the River Clyde. It is the main part of this open space in which local people can walk freely. Planning should protect such valuable existing open space (NPPG3 paragraph 76). This proposal should not be permitted to affect existing paths, which are long-standing rights of way.

AMENITY

It was clear from a Public Meeting in Faifley that many members of the local community felt that a potential gain of shopping facilities would be outweighed by loss of the valued open space. There would be a net loss of amenity to the local community. Pleasant views of green space would be replaced by large buildings, car parks and a petrol station. Houses in the neighbourhood would be exposed to traffic noise and light scatter day and night. For a long period extreme noise, vibration and dust would be suffered from rock removal and general construction.

LOCATION

We object to the location of this proposal. We support the Clydebank Local Plan 2001 Policy CD1 which directs all significant *retail proposals to Clydebank Town Centre*. Policies on retail premises in the current Clydebank Local Plan and Clydebank Local Plan 2001 and the Glasgow & Clyde Valley Joint Structure Plan for the wider area follow the guidance of NPPG8 in presuming against large shopping developments out of town centres unless on a very restricted list of locations, which does not include this location. We believe that (as summarised well in Policy CD2 of Clydebank Local Plan 2001)

- the proposal together with existing retail floorspace could not be supported by the relevant catchment population and the development would undermine the vitality and viability of the existing town centre (retailers struggle to continue)
- the proposal would not enhance accessibility and choice in retail provision within the Plan area (there is plenty already)
- there would be adverse environmental impacts
- there would be significant adverse infrastructure implications
- the proposal would conflict with other Local Plan policies.

PROVISION OF SPACE FOR RETAIL DEVELOPMENT

The Structure Plan requires the council to allocate sufficient land in the Local Plan for large retail developments, and Clydebank Local Plan 2001 has already done so before this application was received. Therefore there should be no further allocation of space for large retail development.

TRAFFIC

This application cannot be satisfactorily commented on or decided without consideration of a Traffic Impact Study, which does not seem to have been submitted. We believe that potential traffic problems are important objections.

OWNERSHIP OF LAND

We believe that the Council owns the land, and could profit from its sale or lease, so cannot have the final say in planning consent. The council should not waste time by approving this proposal because the Scottish Executive must review their approval, and would most likely require the Plans' policies to be upheld.

EMPLOYMENT AND ECONOMICS

The proposal seems unlikely to bring a net gain of employment to the Clydebank district or the area of the West Dunbartonshire Council. Current jobs elsewhere in the area would be lost as this development displaces them. Existing lower-cost businesses would be unlikely to be replaced sufficiently by a new retail building.

The extensive public infrastructure costs are not warranted by community economic gain. Neither the Council nor Dunbartonshire Enterprise should put public funds into this scheme, which would mainly benefit the developers and disadvantage residents and other retailers in the district.

CONCLUSION

We urge you to take our objections into account, and to recommend against this proposal. If you are inclined to favour the development at this stage, we ask you to delay drafting your recommendations until receiving a Traffic Impact Study and Environmental Statement, and providing us and others the opportunity to comment on them. We also wish to attend any site visit and speak at any consultation or Public Inquiry meeting, and ask you to inform us of any meeting or site visit on this application.