

REPORT OF HANDLING FOR APPLICATION

ADDRESS:	Site at Great Western Retail Park/ Great Western Road Glasgow
PROPOSAL:	Amendment of condition NC(b)(a) of application reference 97/02406/DC to amend the restriction limiting sales from bulky goods only to the sale of any non-food items.
DATE OF ADVERT:	The application was advertised for neighbour notification on 7 th December 2010.
NO OF REPRESENTATIONS AND SUMMARY OF ISSUES RAISED	No representations received prior to the end of the period for submission. One letter of objection was received subsequently but this cannot be taken into account.
PARTIES CONSULTED AND RESPONSES	East Dunbartonshire Council – Object on the basis of proposal's impact upon Clydebank town centre and other retail parks within the EDC area and object to the failure to provide a retail impact assessment or sequential assessment against the proposal in relation to these centres. The response to this objection is contained within the main policy assessment of the report.
EIA - MAIN ISSUES	Not applicable
CONSERVATION (NATURAL HABITATS ETC) REGS 1994 – MAIN ISSUES	Not applicable
DESIGN OR DESIGN/ACCESS STATEMENT – MAIN ISSUES	A design and access document was submitted, titled Placemaking and Connectivity. This was a supporting document which outlines high level aspirations for improving the appearance of the existing Great Western Retail Park and improving linkage to public transport and to the existing Drumchapel Town Centre.
IMPACT/POTENTIAL IMPACT STATEMENTS – MAIN ISSUES	A retail impact statement was submitted in support of the application which investigated the potential turnover of the site if it were implemented as currently consented (bulky goods) and if implemented as proposed (retail comparison).
S75 AGREEMENT SUMMARY	None
DETAILS OF DIRECTION UNDER REGS 30/31/32	None
STRUCTURE PLAN POLICIES	Strategic Policy 9 Strategic Policy 10 Both coincide with the relevant City Plan 2 Policies identified below.
CITY PLAN POLICIES	DEV 7 Other Retail and Commercial SC 3 The Sequential Approach for Residential and Commercial Developments SC 4 Large Scale Retail Leisure or Commercial Development SC 8 Sale of Goods in Large Retail Stores Outwith Town Centres
OTHER MATERIAL CONSIDERATIONS	Extant permission for 4,645 sq m of bulky goods floorspace to which this application seeks to alter the bulky goods restriction of non-food or comparison retail floorspace.
REASON FOR DECISION	The proposal was considered to be in accordance with the Development Plan and there were no material considerations which outweighed the proposal's accordance with the Development Plan.

	COMMENTS
PLANNING HISTORY	<p>Full planning permission (ref 97/02406/DC) was granted in 1999 for the erection of non-food retail warehouse of 4,645 sq metres. This was subject to a variety of conditions restricting the proposed operation including a condition limiting the retail use to the sale of DIY, furniture, carpets, soft furnishings, electrical, motoring products, gardening goods and sporting goods. Essentially this translates to a restriction to the sale of bulky goods only.</p> <p>The start of an access road into the site was formed off the existing roundabout situated on the spine road running through the retail park. This was considered to represent a site start and the permission was deemed to have been implemented in 2004, as confirmed in a letter by the Council. This means that the permission would remain extant unless superseded by a new development.</p>
SITE VISITS (DATES)	<p>The application site forms the undeveloped south eastern portion of the Great Western Retail Park (GWRP), which is located between Great Western Road to the south and Drumchapel to the north. The site is accessed from the north off a four-arm roundabout located on the central road serving the entire retail park.</p> <p>The site is bounded to the east by Duntreath Avenue which is a busy but unclassified road linking Drumchapel to the north down to Great Western Road and beyond to Yoker. It is bounded to the north by the spinal road leading through the retail park, to the west by a large bingo club which is contained within the retail park and to the south by the slip road linking Great Western Road to Duntreath Avenue.</p> <p>The site is vacant and is overgrown with vegetation. There is a public footway leading along the east boundary on Duntreath Avenue. A landscaped strip runs adjacent to much of the footway although a portion adjacent to the centre of the site is untended and has become overgrown. The site is relatively level and is generally raised approximately one metre above the surrounding public to the south and east.</p> <p>The retail park, which surrounds most of the site, is made up of extensive areas of car parking and large scale retail and commercial units including bulky goods units and a large Sainsbury's supermarket. The edges of the spinal road have been landscaped with a dense conifer screen which limits visual permeability.</p> <p>Immediately north of the site is an expansive industrial factory unit. To the east of Duntreath Avenue is a medium density post war residential estate.</p> <p>It is proposed to alter the existing condition, which limits the use of the unit(s) on the site to the sale of bulky goods, so that any units on the site would instead be subject to a restriction to selling non-food goods i.e. operating as comparison only. No other element of the extant permission is proposed to be altered by the applicants although they have, through the course of the application, submitted draft proposals for off-site landscape improvement works on land owned either by them or by the Council. The Council, in determining the application, are able to alter any other condition which it sees fit and is relevant to the original proposal.</p> <p>The applicants state that they have identified operators who are interested in moving in to the site.</p>
SITING	<p>The layout of the site would not change from the original permission as a result of this proposal. The general layout involves a single block of retail units running</p>

	<p>along the eastern boundary of the site with parking spaces occupying the eastern portion of the site including adjacent to the access off the four arm roundabout.</p> <p>A non-material variation agreed in 2006 shows the proposed building being divided into five units instead of four as originally approved.</p>
DESIGN AND MATERIALS	This would not change from original approval
DAYLIGHT	Not applicable
ASPECT	Not applicable
PRIVACY	Not applicable
ADJACENT LEVELS	Not applicable
LANDSCAPING (INCLUDING GARDEN GROUND)	As part of the proposal the applicants have stated that they are seeking to understand substantial new landscaping to improve the appearance of the retail park. Details of this have not been submitted but can be required by the use of a suspensive landscaping condition
ACCESS AND PARKING	No change, however, any permission can be worded to enable scope for improvements to be submitted as part of the landscaping works.
SITE CONSTRAINTS	None applicable.
OTHER COMMENTS	<p>The proposal would need to be assessed the relevant Structure Plan and City Plan 2.</p> <p>Structure Plan</p> <p>Strategic Policy 9 (Assessment of Development Proposals)</p> <p>The policy requires proposals for over 2,000 sq metres of comparison retail to be assessed against criteria relating to the expenditure relative to existing town centres, contribution to the vitality and viability of town centres, the need to restrict the types of goods to be sold at out of centre locations to bulky goods and the accessibility of new development proposals.</p> <p>In terms of the sequential approach to new retail development the Structure Plan states that developers and retailers should show flexibility in their approach via accommodating developments in different types of built form or reducing the scale of their operation to be more easily accommodated in a town centre.</p> <p>These criteria are generally replicated in the relevant City Plan 2 Policies outlined below.</p> <p>While the proposal involves the variation of a condition to alter the type of floorspace the application is essentially being treated as a proposal for new comparison floorspace in order to allow a realistic assessment of its potential impact.</p> <p>City Plan 2</p> <p>The site is designated as falling within Development Policy Principle DEV 7 Other Retail and Commercial. Such areas provide commercial services to the general public at out-of-centre and edge-of-centre locations. These substantial areas may be considered suitable for a variety of uses falling within Classes 1, 2, 3, 4 and 11 subject to the other policies of the plan.</p> <p>On the basis that the proposal relates to altering an extant retail use consent within the designation it is considered to be compatible with the DPP, subject to the other</p>

relevant policies.

SC 3 The Sequential Approach for Residential and Commercial

Developments requires proposals for convenience retail of over 2000sq m to comply with the sequential approach to development location. This approach requires retail uses, such as that proposed, to be located in the first instance, within an existing designated town centre. Only where it is demonstrated that there is no suitable, available and viable site within a town centre will consideration be given to an edge of centre location. Only where it is demonstrated that there are no suitable town centre or edge of centre sites available will other DEV 7 designation sites be considered. Factors to be included in consideration are accessibility to public transport, compatibility with other relevant plan policies and any conditions restricting the range of goods to be sold.

The town centres identified for protection in the Structure Plan in the vicinity of the application site are Drumchapel (0.5 km from site) and Anniesland (3km) in Glasgow and Clydebank (2.6km) in West Dunbartonshire.

Given its proximity, the applicants have focused their sequential assessment upon Drumchapel town centre. They have identified an existing unit along with vacant sites within the centre which could be capable of accommodating the proposed development. The existing unit of the former Somerfield supermarket on Duntreath Avenue was identified as the only option in terms of an existing building. However, the applicants have discounted this as an option on the basis that the location does not have the correct profile for the retail operators wishing to open at GWRP, while the actual building is not of a suitable standard for such retailers. The applicants have also stated that any retailer locating there would be detached from other similar retailers who rely on clustering of similar units to generate sufficient customer footfall.

The applicants have supported these arguments by submitting a letter from property consultants who explain that the town centre has become a local centre providing a specific local role with a small but settled tenant line up. They argue that the resulting scale of the town centre does not meet the needs of national operators and they consider this is reflected by the lack of demand from larger operators to move in to the centre over the last decade. It is further argued that the position is compounded by the proximity of Great Western Retail Park which is now seen as the primary retail destination suitable for modern trading in the vicinity. They assert that the demand from retailers to locate at GWRP, as per the current application, is further evidence of the unsuitability of Drumchapel Town Centre for the larger types of retailers that they are hoping to accommodate.

It should be noted that the former supermarket within the town centre has, since the submission of the application, has been acquired and is currently being subdivided by the Co-op group.

In respect of the sites within the centre that could be developed, the applicant has reiterated the arguments relating to the overall lack of attractiveness of the town centre to large operators as justification for ruling them out. They point to the fact that there has been a lack of commercial success for some time and consequently national retailers are simply not considering locating in the town centre. Finally they identify that the previous owners of the centre had failed to attract any new investment over the last decade.

Turning to Clydebank and Anniesland town centres, the applicants have not specifically carried out a sequential assessment of potential alternative sites. They have instead relied on their own retail impact assessment in respect of potential expenditure which shows a relatively limited increase between the consented bulky goods use of the centre and the proposed non-food use. This, they have argued, illustrates that the potential draw from other town centres would have a minimal

impact.

The sequential assessment undertaken has focused on Drumchapel Town Centre and it is accepted that the nature and role of this centre has changed over time. The town centre's contraction has resulted in more parts of the centre being underused and it is noted that the previous owners, PPG, were unsuccessful in attracting new investment during the period of the ownership. This fundamental change in the nature of the town centre's role dictates that a pragmatic approach is necessary in assessing how the sequential test is applied.

While there are sites available within Drumchapel Town Centre the applicants have argued that larger scale operators are not interested in occupying these spaces. The argument promoted does seem to be borne out by the limited commercial interest in the town centre in the last ten years. The sequential test promotes new development locating in the town centre as a first choice. In this case this does not appear to be a commercial reality at Drumchapel. Therefore, there does appear to be a justification in the applicant's approach in that if the application is refused on the basis of not occupying in the existing town centre, it is very unlikely that the potential operators would ever be convinced to locate in the town centre. This is considered to be a significant consideration as it would suggest that imposing the sequential approach will not realise the town centre retail development that is being pursued. Accordingly, the failure to satisfy the sequential approach in relation to Drumchapel Town Centre is not considered to be so harmful that it should be fatal to the application.

In respect of the sequential preference to locate at either Anniesland or Clydebank, the applicants have chosen to rely on the arguments promoted in their retail impact assessment which suggests that the proposal would have a minimal impact upon these centres' vitality and viability. In their supporting statement the applicants acknowledge that the increase in expenditure that the proposed non-food use would generate could be drawn from the other town centres, including Anniesland and Clydebank; although they do suggest that this would be a worst case scenario. However, they argue that the level of impact would be extremely limited. The implied rationale, therefore, is that the impact upon those other centres is so limited that they would not truly form part of the catchment of the GWRP and the proposed non-food retail use. On this basis they have not carried out a sequential analysis of Clydebank or Anniesland. The viability of this argument will be determined in the consideration of the retail assessment below.

Policy SC4 Large Scale Retail or Commercial Leisure Development requires applicants to demonstrate, where a proposal is not consistent with the development plan, that there would be no direct or cumulative impact upon the vitality or viability of the network of centres. There should be good access available to the appropriate catchment population by a variety of means of transport while existing physical infrastructure should be able to cope with the proposal.

In respect of the proposal's impact upon the other centres it has been accepted that the effect upon Drumchapel will be limited despite the application site's proximity. This is because the role of Drumchapel Town Centre has been diluted from a traditional town centre to that of a local centre providing small scale convenience retail along with a range of other services. The comparison retail role that the centre had several years ago has become so diluted that it is accepted that the introduction of over 4,000 sq metres of convenience floorspace at GWRP will now not have any material effect upon the vitality or viability of Drumchapel.

It is also worth noting that the applicants have promoted aspirations to improve pedestrian linkage between Drumchapel and GWRP so that, in effect, they come closer to operating as a single entity. This could be delivered through a condition as it affects Council owned land and it is considered that such improvements would further mitigate what limited impact their might be upon Drumchapel Town Centre.

In respect of the other town centres it has been argued that the scale of impact is reduced due to the fact there is an extant consent for bulky goods which would itself have generated a level of expenditure. While the applicants have acknowledged that a comparison offer would alter the nature of this expenditure, they have argued that it would not be appropriate to completely sever the two streams as there is a degree of blurring between whether bulky goods are also found in town centres.

The applicants have estimated that the turnover generated by the proposal would be £13.06m. Despite arguing that the level of new turnover should be discounted due to the extant bulky goods expenditure, they have assumed a worst case scenario that all of the turnover generated by the proposal will be comparison based. This is intended to provide a robust illustration of the proposal's potential impact upon other town centres.

Of the £13.06 million they anticipate that a proportion will be genuinely new and not diverted from other town centres. Therefore they consider that for comparison of trade diversion from other town centre the draw of Great Western Retail Park will amount to approximately £12 million. The reduction is considered proportionate.

In considering which town centres the proposal will compete with, the applicants argue that Anniesland will not be affected as it does not contain any shops that would be comparable with the types of units that are proposed at the centre. This argument is has some credibility given the nature of existing units in Anniesland town centre as it comprises almost exclusively of Class 2 units, hairdressers and convenience shops. The only units that would be likely to compete with the proposal at GWRP are the three large format units adjacent to the Morrison's supermarket. However, given the limited scope of potential offer that only three units can provide it is not considered unreasonable to conclude that the proposal's impact upon Anniesland will be so limited that it will be negligible.

Following on from the conclusion regarding Anniesland, the applicants have argued that the proposal would only draw expenditure from three existing shopping locations, namely Clydebank, Braehead and the city centre. They have divided the expenditure equally so that £4million would be drawn from each destination. Of the city centre, that figure would amount to a 0.17% diversion of its £2,616m annual turnover which they consider to be negligible. They state correctly that Braehead is not a protected centre meaning that the only outstanding impact is that upon Clydebank Town Centre.

The applicants have submitted that Clydebank has a turnover of £169 m and that the maximum potential draw to GWRP of £4 million would amount to a 2.3% diversion. However, the applicants stress that this is a very worst case scenario and that they believe that the true impact will be substantially less.

It is considered that the limited extent of the potential impact, even as a worst case scenario is not so much that it would justify resisting the proposed application.

In terms of concluding the sequential assessment on the basis of the information it is considered that the applicant's have not established that Clydebank is serving a different catchment as they have acknowledged that there will be trade draw. However, the magnitude of that trade draw is going to be so limited it will mean that the potential impact will be minimal. On this basis the applicant's approach and conclusion that a sequential assessment of opportunities in Clydebank is unnecessary is accepted.

In terms of policy **SC 4 Large Scale Retail Leisure or Commercial Development** many of the criteria contained in the policy overlap with the assessment undertaken in the policy assessment above. Additional criteria set by the policy are

	<p>that there should be good access to a catchment population, there is existing physical infrastructure capable of accommodating the proposal, there will be no harm to residential amenity and the proposal does not conflict with any other strategic</p> <p>It is considered that there is a realistic catchment population which is expected to only grow as a result of the new neighbourhoods project which is intended to add around 1000 new dwellings in the Drumchapel vicinity.</p> <p>The site already has the infrastructure in that there is already an extant consent for the development which has been implemented.</p> <p>The retail use is already established as acceptable in relation to the proximity of residential properties.</p> <p>The impact upon strategic policies is considered in the assessment above.</p> <p>Overall the proposal is considered to be compliant with Policy SC 4.</p> <p>Policy SC 8 Sale of Goods in Large Retail Stores Outwith Town Centres states that new development in out-of-centre retail parks will generally be restricted to bulky goods and convenience retail will not normally be supported. The overall intention behind the policy is to support the sequential approach towards directing convenience and comparison retail to town centre locations. In this case the proposal does not satisfy the general presumption against open convenience in out-of-centre retail parks. However, it has been shown above that the intention of the sequential approach will not be materially harmed as a result of the proposed variation of the condition as the other protected town centres will suffer minimal if any impacts upon their vitality and viability. Accordingly it is considered that the proposal is acceptable.</p>
RECOMMENDATION	Recommend grant subject to an altered condition as proposed and the addition of one condition relating to hard and soft landscaping on and off site.

Date:	DM Officer
Date	DM Manager