

## **REPORT TO GLASGOW CITY COUNCIL**

### **PROPOSED GLASGOW CITY DEVELOPMENT PLAN EXAMINATION**

Reporters: Timothy P W Brian BA (Hons) DipURP MRTPI  
Sinead Lynch BSc (Hons) MRTPI  
Martin Seddon BSc MPhil DipTP MRTPI

Date of Report: 17 June 2016

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## EXAMINATION OF CONFORMITY WITH PARTICIPATION STATEMENT

In carrying out an examination under Section 19 of the Town and Country Planning (Scotland) Act 1997 (as amended) the appointed reporters are required firstly to examine:

*“the extent to which the planning authority’s actions with regard to consultation and the involvement of the public at large as respects the proposed plan have conformed with (or have been beyond the requirements of) the participation statement of the authority which was current when the proposed plan was published under section 18(1)(a).”*

Paragraph 110 of Planning Circular 6/2013: Development Planning envisages that, in carrying out the examination of conformity with the participation statement, the appointed person will only refer to published documents – e.g. the participation statement, the authority’s statement of conformity, and representations about the authority’s consultation and public involvement activities.

Glasgow City Council prepared a statement of conformity to meet Section 18(4)(a)(i) of the Planning (Scotland) Act 2006, which requires planning authorities to submit a report on the extent to which the authority has consulted and involved the wider public and how the authority has conformed with its current participation statement. The participation statement relating to the Glasgow City Development Plan, which was contained within the Annual Update: March 2014 to the council’s Development Plan Scheme, set out when consultation was to take place, who was to be consulted, and how this consultation would happen in the preparation of the proposed City Development Plan.

As well as fulfilling statutory consultation obligations, the council aimed to increase the range and number of stakeholders in the plan preparation process, and increase general awareness of the Plan. A number of new and innovative techniques were introduced at the Main Issues Report consultation stage (freepost postcards, twitter feeds and youtube uploads) to encourage anyone who lives, works and visits Glasgow to get involved and influence what happens in the City.

At the Proposed Plan stage the council carried out the following:

- provided development plan training, through Planning Aid for Scotland, for interest groups such as community councils and local housing associations to explain how and when people could become involved;
- distributed copies of final documents either in hard copy format or via e-mail/weblinks;
- published statutory notices in local newspapers to publicise the Plan and to explain where people could access information, how they could comment, and where they could get more assistance if required;
- produced regular summary information (Development Plan Scheme and Development Plan Bulletin);
- used existing electronic networking (e-mails, other organisations’ electronic bulletins) to publicise the Plan;
- kept elected members fully informed, including workshops, briefings, etc.;
- sent letters/e-mails to consultees and stakeholders, as appropriate – particularly just before key stages in the process to alert them to upcoming events and immediately after key events to advise of any outcomes/key findings;

- made the Plan and any associated documents or reports widely available in the City's libraries, at the council offices and on the council website;
- made full use of, and further developed, the Local Development Plan part of the council's website, in line with the Scottish Government's e-planning agenda;
- the council's twitter feed was used to reach a wider audience in publicising the proposed plan;
- STV Glasgow featured the Local Development Plan on 1 May 2014.

Although budgetary pressures meant that the council was unable to produce posters at the Proposed Stage, as it had done at the earlier Main Issues Report stage, we are satisfied that the extensive advertisement of the Proposed Plan described above gave the Plan broad public exposure.

In conclusion, having reviewed the Development Plan Scheme and the supporting documentation submitted by the council, we are satisfied that Glasgow City Council conducted a wide ranging consultation exercise on the Plan as envisaged by Scottish Ministers, and in doing so fulfilled the terms of the participation statement.

We therefore proceed to examine the proposed local development plan.

**Timothy Brian**

Reporter

23 July 2015

Issue 01	Introduction, Glossary and General/Miscellaneous	
Development plan reference:	Introduction (Pages 5-9), Glossary (Pages 64-68) and General/Miscellaneous	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
Bill Carson (00144) East Dunbartonshire Council (00411) Hillhead Community Council (00479) George Capital LLP (00636) The Glasgow Tree Lovers' Society (00655) Scottish Property Federation (00818)		
Provision of the development plan to which the issue relates:	The Introduction section sets the scene by: <ul style="list-style-type: none"><li>describing the regional and national policy context that the Plan operates within</li><li>setting out the Plan's purpose, explaining its scope, structure and content and describing how it should be used</li><li>explaining the relationship of supporting documents</li><li>providing information about the local development plan process, including details of how, when and where people can get involved.</li></ul> The Glossary provides a plain word definition of the most commonly used planning words, terminologies and references. The Glossary is a quick reference guide and not a source for statutory definitions.	
Planning authority's summary of the representation(s):		
<u>Community Engagement</u>		
<u>Objecting</u>		
Bill Carson 00144/4/001 - There needs to be better community engagement and more use made of Community Planning Partnerships and Community Councils. This could involve, for example, 'planning' training for community councils or work placement or shadowing schemes with the Council's Development and Regeneration Services.		
00479/10/002 Hillhead Community Council - The consultation process has changed from previous Development Plans and there has been a lack of education provided to ensure the population are properly prepared to comment.		
00479/10/006 Hillhead Community Council - The process for individuals to comment on the Development Plan was not user friendly and did not allow for comments to be shared, saved, sent, printed or copied.		
00479/10/008 Hillhead Community Council - Timescales to comment on the Plan were insufficient. The Community Council waited weeks to receive a printed copy of the plan. No copies of the supplementary documents were distributed. A deadline of Friday 4th		

June did not leave time for a full consideration of all the information, to alert the community, or consult.

00479/10/013 Hillhead Community Council - The methods of consultation employed are not sufficient in engaging parts of the population. Online copies of the Development Plan and associated documents are not readily available to those who are not computer-adept and this may discourage participation and lead to costs associated with printing.

#### Glossary

#### Objecting

00479/10/001 Hillhead Community Council - The Plan should include a glossary which also explains what initials/acronyms stand for.

#### General Comment

#### Objecting

00479/10/004 Hillhead Community Council - The broad proposals do not contain sufficient detail and, therefore, the implications of these are difficult to understand. Further to this, the Plan's principles/concepts do not always appear connected or deliverable. This makes it difficult to comment on the Plan or understand its implications.

00479/10/005 Hillhead Community Council - The Plan should not provide for 'mitigation' as a means of addressing the impacts of unacceptable development as this would be open to exploitation by potential applicants, particularly in the absence of more information regarding what this would mean.

00479/10/007 Hillhead Community Council - The Development Plan was published prior to the SPP and NPF and aspects of the Plan are predicated in these documents. If changes to either the SPP or NPF impact on the Plan then a further period of consultation should be undertaken.

00479/10/009 Hillhead Community Council - The Plan is full of good intentions but lacks detail on how these will be achieved. The Action Plan leaves the detail of many policies to the future, but some policies for particular areas (e.g. the designation of the Western Infirmary Site) appear to have been embedded in the Plan in advance of the appropriate campus plan having been prepared.

00479/10/011 Hillhead Community Council - The design of the Development Plan does the City a disservice.

00479/10/012 Hillhead Community Council - The Plan should not be adopted prior to further consultation on statutory guidance and more detailed maps.

00655/2/001 The Glasgow Tree Lovers' Society - The Plan has been produced with little real content and appears to be more of a strategic marketing and PR exercise. It should be a clear and understandable exposition of the City needs, based on firm statistics and evaluation of the two previous City Plans.

## Supporting

00818/1/001 Scottish Property Federation - Broadly welcomes the Proposed Plan and supports its intent and structure. We believe that there is an opportunity for the City to take a positive role in enabling significant investment in Glasgow's built environment in the immediate future.

00636/15/001 George Capital LLP - Supports the Proposed Plan's overall support for the Glasgow City Centre as main hub for commercial activity, transport and shopping. George Capital's site is located in the City Centre and is 'well-connected' in terms of access to public transport and sustainable transport modes such as walking and cycling routes.

00411/5/001 East Dunbartonshire Council - East Dunbartonshire Council acknowledges and commends Glasgow City Council on the Proposed City Development Plan and welcomes the opportunity to comment. The Plan is a clear, concise and highly readable policy document that, in our opinion, reflects the Scottish Government's aspirations for more modern and accessible types of document.

## **Modifications sought by those submitting representations:**

### Community Engagement

00144/4/001 Bill Carson – The Plan process should involve greater engagement. No particular modification to the Plan.

00479/10/002 Hillhead Community Council - Further information is required to aid an understanding of the nature of the new Local Development Plan process.

00479/10/006 Hillhead Community Council - The process for submitting comments on the Plan requires to be improved.

00479/10/008 Hillhead Community Council - A lengthier consultation is required to study documents, ask questions about the implications of the Plan and to clarify points of doubt.

00479/10/013 Hillhead Community Council - A more democratic consultation process is required to enable everyone, regardless of computer ownership or access, to have a say.

### Glossary

00479/10/001 Hillhead Community Council - The Plan should include a glossary which also explains what initials/acronyms stand for.

### General Comment

00479/10/004 Hillhead Community Council - The Plan should include more detail on all matters, particularly proposals.

00479/10/005 Hillhead Community Council - The Plan needs to include a definition of exactly what is meant by 'mitigation'.

00479/10/007 Hillhead Community Council - Should changes to SPP or NPF3 have implications for the Plan, further consultation should be undertaken.



00479/10/009 Hillhead Community Council - The Plan should include more detail as to how the Plan's intentions are to be delivered.

00479/10/011 Hillhead Community Council - The Plan should include more detail if it is to be effective.

00479/10/012 Hillhead Community Council - Further consultation should be undertaken on statutory guidance and more detailed Plan maps produced prior to the Plan being adopted.

00655/2/001 The Glasgow Tree Lovers' Society - The Plan should contain an understandable exposition of City needs, based on form statistics and a prior evaluation of the two previous City Plans.

### **Summary of responses (including reasons) by planning authority:**

#### Community Engagement

#### Objecting

00144/4/001 Bill Carson, 00479/10/002 Hillhead Community Council - The Council is firmly committed to ensuring that all Glasgow's citizens have equal access to the Council's range of services, including the planning service. The City Development Plan for Glasgow is a key part of the planning service. The Plan contains policies and proposals which affect how land is used, which in turn helps to sustain the regeneration of the City and create and support strong communities.

It has been widely recognised that public consultation and engagement is a very important part of preparing the Plan. Public consultation and stakeholder engagement took place, therefore, at various stages in the local development plan process. There were numerous and significant opportunities for public bodies and agencies, the private sector and members of the public to make their views known and to influence regeneration activity in the City. At key stages the Council went beyond the statutory minimum consultation requirements (particularly at the Main Issues Report stage) in order to help residents and communities better understand and get more involved in the planning issues affecting their area.

Such measures have helped to ensure that the Plan reflects and will help to deliver the outcomes considered critical to the City's ongoing success as a place in which to live and work.

No modifications recommended.

00479/10/006, 00479/10/008, 00479/10/013 Hillhead Community Council - It has been widely recognised that public consultation and engagement is a very important part of preparing the Plan. Public consultation and stakeholder engagement took place, therefore, at various stages in the local development plan process. There were numerous and significant opportunities for public bodies and agencies, the private sector and members of the public to make their views known and to influence regeneration activity in the City. At key stages, the Council went beyond the statutory minimum consultation requirements (particularly at the Main Issues Report stage) in order to help residents and communities better understand and get more involved in the planning issues affecting

their area. Circular 6/2013: Development Planning (CE11, paragraphs 73-76) sets out minimum publication requirements to apply at the Main Issues Report, Proposed Plan and modified plan (if any) stages. The Plan not only met, but often exceeded these requirements. In addition, recent advice from the Scottish Government is to make the best use of new technology and integrate this, wherever appropriate, into the planning process.

No modifications recommended.

## Glossary

### Objecting

00479/10/001 Hillhead Community Council - This is a reasonable suggestion. The Plan already has a Glossary at the back which lists the key terms and abbreviations and provides a succinct definition of each. In the interests of clarity, this could be extended to include all the abbreviations used in the Plan.

The Reporter could, if so minded, amend the Glossary as follows:

Add the following abbreviations to the existing definitions:

- Combined Heat and Power (CHP)
- Local (Glasgow) Housing Strategy (GHS)
- Low and Zero Carbon Generating Technologies (LZCGT)
- The Metropolitan Glasgow Strategic Drainage Partnership (MGSDP)
- National Planning Framework (NPF)
- Potential Vulnerable Area (PVA)
- Strategic Economic Investment Location (SEIL)
- Sustainable Urban Drainage System (SUDS)
- Surface Water Management Plan (SWMP)
- Transport Assessment (TA)
- Travel Plan (TP)

Add the following new entries:

Scottish Planning Policy (SPP) - Published on 23 June 2014, SPP sets out national planning policies for operation of the planning system and for the development and use of land. The SPP promotes consistency in the application of policy across Scotland whilst allowing sufficient flexibility to reflect local circumstances. It directly relates to, amongst other things, the preparation of development plans.

Glasgow and the Clyde Valley Strategic Development Plan (GCVSDP) - The GCVSDP was approved with modifications by Scottish Ministers on 29 May 2012. It sets out a development strategy for the next 20 years outlining where new development should be located and provides 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.

Gross Value Added (GVA) - A measure of the value of goods and services produced in an area, industry or sector of an economy.

**Glasgow Economic Leadership (GEL)** - GEL was established in 2011 to provide independent leadership and direction to economic development activity in Glasgow and to champion the implementation of the recommendations made by the Glasgow Economic Commission.

**National Health Service (NHS)** - The four publicly funded health care systems in the countries of the UK are referred to as the NHS. These systems, primarily funded through central taxation, provide a comprehensive range of health services, the vast majority of which are free at the point of use for people legally resident in the United Kingdom.

**International Financial Services District (IFSD)** - Since its launch in 2001, Glasgow's IFSD has created a highly attractive environment for indigenous and overseas firms in finance and related sectors. The IFSD, located in the south-western sector of the City Centre, is driven by a partnership between the public and private sectors. Over £1 billion investment has been secured to date (over 90% from the private sector) with over 15,500 net new jobs moving into the District through new investment, expansion or diversified development.

**Higher and Further Education Sector (HFE)** - Further education relates to courses taken at college, excluding degree level courses. Further education tends to be work-focused (vocational) and is usually fully funded. Further education includes: National Qualifications, City and Guilds vocational courses, Access courses and Modules. Higher education relates to degree level education and can be taken at university or college. Higher education includes: Degrees, Higher National Certificates (HNC's), Higher National Diplomas (HND's) and Postgraduate courses such as PhD's.

**International Technology and Renewable Energy Zone (ITREZ)** - Centred in Glasgow, ITREZ is Scotland's International Technology and Renewable Energy Zone. It aims to bring business and academia together by stimulating co-location, innovation, and investment in Scotland's offshore renewable energy sector.

**Petroleum Exploration and Development Licence (PEDL)** - A UK Petroleum Exploration and Development licence (PEDL) allows a company to pursue a range of oil and gas exploration activities, subject to necessary drilling/development consents and planning permission.

**Glasgow and the Clyde Valley Green Network Partnership (GCVGNP)** - The GCVGNP was established to oversee the development of the green network. The four themes of the Green Network Programme are health improvement, biodiversity and environment, stronger communities and enterprise development. The GCVGNP is involved in a number of projects in Glasgow such as Clyde Waterfront, Clyde Gateway, Seven Lochs Wetland Park and a number of smaller scale neighbourhood projects which encourage the creation and management of local greenspace.

**Open Space Strategy (OSS)** - It is a requirement of local authorities that they undertake an open space audit and on the basis of it, prepare an OSS for their area. Work is currently ongoing to produce a draft Open Space Strategy for Glasgow, which will include open space standards for the City. The Open Space Strategy will be used to help deliver a better distribution of good quality, multifunctional open spaces that meet the needs of the City.

**Local Biodiversity Action Plan (LBAP)** - LBAP's are seen as crucial for implementing the UK Biodiversity Action Plan at a local level. In Glasgow a local Steering Group, comprising some 18 partner organisations and Council services, has guided the development of the City's LBAP. Launched in September 2001, Glasgow's LBAP comprised an introductory booklet along with 9 Species Action Plans (SAP's) and 11 Habitat Action Plans (HAP's). A further 10 Action Plans were produced in September 2002, with more being planned for future publication.

**Local Nature Reserve (LNR)** - Areas of at least locally important natural heritage, designated and managed by local authorities, to give people better opportunities to learn about and enjoy nature close to where they live.

**Flood Risk Management Act (FRM)** - The Flood Risk Management (Scotland) Act 2009 was enacted on June 16, 2009. The Act introduces a more sustainable and modern approach to flood risk management, suited to the needs of the 21st century and to the impact of climate change. It creates a more joined up and coordinated process to manage flood risk at a national and local level.

**Drainage Impact Assessment (DIA)** - A DIA is a report, prepared by a developer, which sets out the drainage issues relevant to a proposal where it is proposed to discharge surface water to a waterbody/watercourse.

**National Records of Scotland (NRS)** - NRS was established on 1 April 2011, following the merger of the General Register Office for Scotland (GROS) and the National Archives of Scotland (NAS). NRS performs the registration and statistical functions of the Registrar General for Scotland, including responsibility for demographic statistics, census and archives.

**Housing Needs and Demand Assessment (HNDA)** - The statutory basis for an HNDA is contained in the Housing (Scotland) Act 2001, which requires local authorities to carry out an assessment of housing provision and provision of related services and prepare, and submit to the Scottish Ministers, a Local Housing Strategy. The assessment of housing provision must include the nature and condition of the housing stock, the needs of persons in the area for housing accommodation, the demand for, and availability of, housing accommodation and the availability of housing accommodation designed or adapted for persons with special needs.

**Glasgow Housing Strategy (GHS)** - Approved on 1st March 2012, GHS sets out the housing issues and priorities for Glasgow and provides a strategic framework for housing in all tenures. It represents a shared understanding developed in partnership with housing interests and stakeholders in the City.

**Site of Importance for Nature Conservation (SINC, L-SINC or C-SINC)** - A SINC is a non-statutory designation given to a locally important area of nature conservation interest.

**Strategic Transport Appraisal Guidelines (STAG Appraisal)** - STAG involves the appraisal of options which could potentially address identified transport problems and opportunities against a range of criteria, including value for money. The completion of a STAG study and production of the STAG Report should precede any application for planning consent or the production of development management Transport Assessments in support of developments.

General CommentObjecting

00479/10/004, 00479/10/011, 00479/10/012 Hillhead Community Council - In line with Scottish Government guidance and advice, the intention was always to keep the Plan as brief and concise as possible. It is intended that a suite of Supplementary Guidance will accompany and support the Plan. This Guidance will cover the range of topic areas mentioned in the Plan. It should be noted that not all of the Supplementary Guidance associated with the Plan will be available before the Plan is submitted to Ministers for Examination. Circular 6/2013: Development Planning (*CE11*, paragraph 141) states that 'the content of Supplementary Guidance does not need to be scrutinised at Examination given that the principle of the policy or proposal will already have been scrutinised and subsequently included in the SDP or LDP - the Supplementary Guidance will be limited to providing further detail on that.' In terms of the content of Supplementary Guidance, Circular 6/2013 refers to Regulation 27(2) of the Town and Country Planning (Development Planning) (Scotland) Regulations 2008 (*CE19*) which requires Supplementary Guidance to cover topics specifically identified in the SDP or LDP as being topics for Supplementary Guidance and be limited to the provision of further information or detail in respect of policies or proposals set out in the SDP or LDP. There must be a sufficient 'hook' in the SDP or LDP policies or proposals to hang the Supplementary Guidance on, in order to give it statutory weight.' In the interests of clarity and transparency, however, it would be helpful to add text to the end of each policy in the Plan to provide a more explicit link to associated Supplementary Guidance and to provide further detail on the content of that guidance (refer to Issue No 54).

No modifications recommended.

00479/10/005 Hillhead Community Council - As the intention was to keep the Plan as brief and concise as possible, the Plan's policies and proposals, including mitigation measures, are dealt with and considered in the Plan at a strategic, City-wide level. It is intended that further detail on many aspects of the Plan will be included in the suite of Supplementary Guidance which will accompany and support it. This Supplementary Guidance will cover the range of topic areas mentioned in the Plan, including mitigation measures.

No modifications recommended.

00479/10/007 Hillhead Community Council - All local development plans are written at a certain point in time and are, therefore, limited by the legislation, policy and guidance which is available at that point in time. The new local development plan process is far more flexible than its predecessor in that any new guidance, policy or legislation which comes along during the lifetime of the Plan, and which is relevant, can be reflected by that local authority in new Supplementary Guidance.

No modifications recommended.

00479/10/009 Hillhead Community Council - All planning authorities are required to prepare Action Programmes alongside their Local Development Plan. An Action Programme sets out how a local authority proposes to implement its plan. The Council is currently preparing an Action Programme for the Proposed Local Development Plan, which will be published before the Plan is submitted to Ministers for Examination and

regularly updated, which will set out:

- a list of actions required to deliver each of the plan's policies and proposals
- the name of the person who is to carry out the action
- the timescale for carrying out each action

In relation to the Western Infirmary site, it should be noted that this site has been designated as an Economic Development Area (EDA) and Masterplan area. The EDA status will form part of the Economic Development Areas review process and reflects the 'healthcare/hospital status' of the site. The masterplan status, however, acknowledges that there is the prospect for change and this will accommodate the University's Campus Development Framework.

No modifications recommended.

00655/2/001 The Glasgow Tree Lovers' Society - The first stage in the local development process was the production of a Monitoring Statement (*CE20*) in September 2011 to support the Main Issues Report. The Monitoring Statement provided an overview of the principal physical, economic, social and environmental changes that had occurred since the Finalised Draft City Plan 2 was published in 2007. It also commented on the progress made in respect of the actions highlighted in City Plan 2 (*CE17*). In addition, a series of Background Papers (*OC45, 46, 48, 50, 52, 67-74*) were produced which directly informed the new Proposed Plan. These Background Papers related to the key policies in the Plan and documented all the relevant background, research and supporting material. The Plan has also been prepared in accordance with the Scottish Government's Circular 6/2013: Development Planning (*CE11*) which explains Scottish Ministers' expectations for the key parts of the development plan process and provides a minimum set of requirements.

No modifications recommended

### **Reporter's conclusions:**

#### Community engagement

1. In our examination of conformity with the participation statement we found that the council had conducted a wide ranging consultation exercise on the Proposed Plan, including the following measures:

- providing development plan training, through Planning Aid for Scotland, for interest groups such as community councils and local housing associations to explain how and when people could become involved;
- distributing copies of final documents either in hard copy format or via e-mail/web links;
- publishing statutory notices in local newspapers to publicise the Proposed Plan and to explain where people could access information, how they could comment, and where they could get more assistance if required;
- producing regular summary information (Development Plan Scheme and Development Plan Bulletin);
- using existing electronic networking (e-mails, other organisations' electronic bulletins) to publicise the Proposed Plan;
- keeping elected members fully informed, including workshops, briefings;

- sending letters/e-mails to consultees and stakeholders, as appropriate – particularly just before key stages in the process to alert them to upcoming events and immediately after key events to advise of any outcomes/key findings;
- making the Proposed Plan and any associated documents or reports widely available in the City's libraries, at the council offices and on the council website;
- making full use of, and developing, the Local Development Plan part of the council's website, in line with the Scottish Government's e-planning agenda;
- using the council's twitter feed to reach a wider audience in publicising the proposed plan; and
- STV Glasgow featured the Local Development Plan on 1 May 2014.

2. I am therefore satisfied that there was an appropriate level of community engagement on the Proposed Plan, and conclude that the criticisms of the consultation process are not justified.

### Glossary

3. I agree with Hillhead Community Council that the Proposed Plan would benefit from an explanation of all of the various initials and acronyms used in the text. I also consider that the glossary should be expanded to explain the additional terms referred to in the Plan. I therefore propose to incorporate the suggestions made by the council above.

### General comment

4. I understand the concern expressed by Hillhead Community Council that the Proposed Plan lacks detail, especially on proposals put forward in the Plan. However, paragraph 79 of Planning Circular 6/2013: Development Planning makes clear that *"Scottish Ministers expect local development plans to be concise, map-based documents, making use of plain language and a range of graphical techniques to convey the strategy and proposals in an accessible way. Ministers expect Proposed Plans to be shorter than the Main Issues Report, as they do not need to set out discussion on alternatives."* I consider that the Proposed Plan meets Ministers' expectations in that regard.

5. In any case the Proposed Plan, when adopted, will not sit on its own. It will be accompanied by Supplementary Guidance which will contain much material which might have been incorporated into Local Plans in the past and will also form part of the statutory development plan. Suitable topics for Supplementary Guidance include detailed policies where the main principles are already established, development briefs and masterplans, and exact levels of developer contributions or methodologies for their calculation.

6. However paragraphs 138-139 of the circular underline that there must be an appropriate context (a 'hook') in the Proposed Plan if the Supplementary Guidance is to be given statutory weight. Elsewhere in this report, under Issue 54, the council acknowledges the need to make a more explicit link between policies in the Plan and the associated Supplementary Guidance. Providing there is a sufficient connection between the two associated documents, there should be no difficulty with the approach the council has adopted in this matter.

7. There is a separate process for consultation on Supplementary Guidance, which does not form part of this examination.

8. The council has now published a Draft Action Plan, which sets out how the authority

proposes to implement the Proposed Plan. It explains what needs to be done, who is to do it, and when it is to be done. In doing so it meets a statutory requirement, and answers one of specific criticisms made by Hillhead Community Council.

9. It is not necessary for the Proposed Plan to define the term 'mitigation'. The extent to which the adverse effects of a development may be mitigated is a detailed matter depending on the circumstances of the site and the proposal. Further guidance on the matter will be provided in Supplementary Guidance.

10. The Proposed Plan was published prior to the issue of the most recent Scottish Planning Policy (SPP) and National Planning Policy Framework 3 (NPF3), but it would not be appropriate to delay the progress of the City Development Plan to embark on another round of consultation. As part of the examination we consider whether the Plan is compliant with SPP and NPF3, and if not whether any modifications are required to bring it in line.

11. With regard to the Western Infirmary, it is clear that a masterplan will be required to consider the future of this surplus NHS location.

12. In response to the criticism by the Glasgow Tree Lovers' Society, the Proposed Plan should not be considered in isolation. It represents the latest stage in a process which started in 2011 with a Monitoring Statement that reviewed the changes since the publication of City Plan 2. The Proposed Plan has also been supported by a series of technical background papers covering a myriad of topics including economic development, sustainable transport, green belt and green network, natural environment, meeting housing needs and green belt review. I conclude the criticism is not justified.

13. I note the comments in support of the Proposed Plan, but they do not affect my conclusions on the matters above.

#### **Reporter's recommendations:**

Modify The Glossary of the Proposed Plan as follows:

Add the following abbreviations to the existing definitions:

- *Combined Heat and Power (CHP)*
- *Local (Glasgow) Housing Strategy (GHS)*
- *Low and Zero Carbon Generating Technologies (LZCGT)*
- *The Metropolitan Glasgow Strategic Drainage Partnership (MGSDP)*
- *National Planning Framework (NPF)*
- *Potential Vulnerable Area (PVA)*
- *Strategic Economic Investment Location (SEIL)*
- *Sustainable Urban Drainage System (SUDS)*
- *Surface Water Management Plan (SWMP)*
- *Transport Assessment (TA)*
- *Travel Plan (TP)*

Add the following new entries:

*Scottish Planning Policy (SPP) - Published on 23 June 2014, SPP sets out national*



*planning policies for operation of the planning system and for the development and use of land. The SPP promotes consistency in the application of policy across Scotland whilst allowing sufficient flexibility to reflect local circumstances. It directly relates to, amongst other things, the preparation of development plans.*

*Glasgow and the Clyde Valley Strategic Development Plan (GCVSDP) - The GCVSDP was approved with modifications by Scottish Ministers on 29 May 2012. It sets out a development strategy for the next 20 years outlining where new development should be located and provides 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.*

*Gross Value Added (GVA) - A measure of the value of goods and services produced in an area, industry or sector of an economy.*

*Glasgow Economic Leadership (GEL) - GEL was established in 2011 to provide independent leadership and direction to economic development activity in Glasgow and to champion the implementation of the recommendations made by the Glasgow Economic Commission.*

*National Health Service (NHS) - The four publicly funded health care systems in the countries of the UK are referred to as the NHS. These systems, primarily funded through central taxation, provide a comprehensive range of health services, the vast majority of which are free at the point of use for people legally resident in the United Kingdom.*

*International Financial Services District (IFSD) - Since its launch in 2001, Glasgow's IFSD has created a highly attractive environment for indigenous and overseas firms in finance and related sectors. The IFSD, located in the south-western sector of the City Centre, is driven by a partnership between the public and private sectors. Over £1 billion investment has been secured to date (over 90% from the private sector) with over 15,500 net new jobs moving into the District through new investment, expansion or diversified development.*

*Higher and Further Education Sector (HFE) - Further education relates to courses taken at college, excluding degree level courses. Further education tends to be work-focused (vocational) and is usually fully funded. Further education includes: National Qualifications, City and Guilds vocational courses, Access courses and Modules. Higher education relates to degree level education and can be taken at university or college. Higher education includes: Degrees, Higher National Certificates (HNC's), Higher National Diplomas (HND's) and Postgraduate courses such as PhD's.*

*International Technology and Renewable Energy Zone (ITREZ) - Centred in Glasgow, ITREZ is Scotland's International Technology and Renewable Energy Zone. It aims to bring business and academia together by stimulating co-location, innovation, and investment in Scotland's offshore renewable energy sector.*

*Petroleum Exploration and Development Licence (PEDL) - A UK Petroleum Exploration and Development licence (PEDL) allows a company to pursue a range of oil and gas exploration activities, subject to necessary drilling/development consents and planning permission.*

*Glasgow and the Clyde Valley Green Network Partnership (GCVGNP) - The GCVGNP*

*was established to oversee the development of the green network. The four themes of the Green Network Programme are health improvement, biodiversity and environment, stronger communities and enterprise development. The GCVGNP is involved in a number of projects in Glasgow such as Clyde Waterfront, Clyde Gateway, Seven Lochs Wetland Park and a number of smaller scale neighbourhood projects which encourage the creation and management of local greenspace.*

*Open Space Strategy (OSS) - It is a requirement of local authorities that they undertake an open space audit and on the basis of it, prepare an OSS for their area. Work is currently ongoing to produce a draft Open Space Strategy for Glasgow, which will include open space standards for the City. The Open Space Strategy will be used to help deliver a better distribution of good quality, multifunctional open spaces that meet the needs of the City.*

*Local Biodiversity Action Plan (LBAP) - LBAP's are seen as crucial for implementing the UK Biodiversity Action Plan at a local level. In Glasgow a local Steering Group, comprising some 18 partner organisations and Council services, has guided the development of the City's LBAP. Launched in September 2001, Glasgow's LBAP comprised an introductory booklet along with 9 Species Action Plans (SAP's) and 11 Habitat Action Plans (HAP's). A further 10 Action Plans were produced in September 2002, with more being planned for future publication.*

*Local Nature Reserve (LNR) - Areas of at least locally important natural heritage, designated and managed by local authorities, to give people better opportunities to learn about and enjoy nature close to where they live.*

*Flood Risk Management Act (FRM) - The Flood Risk Management (Scotland) Act 2009 was enacted on June 16, 2009. The Act introduces a more sustainable and modern approach to flood risk management, suited to the needs of the 21st century and to the impact of climate change. It creates a more joined up and coordinated process to manage flood risk at a national and local level.*

*Drainage Impact Assessment (DIA) - A DIA is a report, prepared by a developer, which sets out the drainage issues relevant to a proposal where it is proposed to discharge surface water to a waterbody/watercourse.*

*National Records of Scotland (NRS) - NRS was established on 1 April 2011, following the merger of the General Register Office for Scotland (GROS) and the National Archives of Scotland (NAS). NRS performs the registration and statistical functions of the Registrar General for Scotland, including responsibility for demographic statistics, census and archives.*

*Housing Needs and Demand Assessment (HNDA) - The statutory basis for an HNDA is contained in the Housing (Scotland) Act 2001, which requires local authorities to carry out an assessment of housing provision and provision of related services and prepare, and submit to the Scottish Ministers, a Local Housing Strategy. The assessment of housing provision must include the nature and condition of the housing stock, the needs of persons in the area for housing accommodation, the demand for, and availability of, housing accommodation and the availability of housing accommodation designed or adapted for persons with special needs.*

*Glasgow Housing Strategy (GHS) - Approved on 1st March 2012, GHS sets out the*

*housing issues and priorities for Glasgow and provides a strategic framework for housing in all tenures. It represents a shared understanding developed in partnership with housing interests and stakeholders in the City.*

*Site of Importance for Nature Conservation (SINC, L-SINC or C-SINC) - A SINC is a non-statutory designation given to a locally important area of nature conservation interest.*

*Strategic Transport Appraisal Guidelines (STAG Appraisal) - STAG involves the appraisal of options which could potentially address identified transport problems and opportunities against a range of criteria, including value for money. The completion of a STAG study and production of the STAG Report should precede any application for planning consent or the production of development management Transport Assessments in support of developments.*

Issue 02	City Profile and Context	
Development plan reference:	City Profile and Context (Pages 10-15)	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
Glasgow Centre for Population Health (00442) Strathclyde Partnership for Transport (00633) Clyde Gateway URC (00664) Scottish Property Federation (00818)		
Provision of the development plan to which the issue relates:	The City Profile and Context section contains economic, social and environmental facts and figures that: <ul style="list-style-type: none"><li>• explain statistically how the City has been changing</li><li>• describe what the current key issues are</li><li>• highlight the main challenges which the Plan’s land use strategy is seeking to address</li></ul>	
Planning authority’s summary of the representation(s):		
<u>Objecting</u>  00442/7/001 Glasgow Centre for Population Health - We would like the Plan to recognise that changing demographic trends will have an impact on population needs. For example, it is predicted that the number of people aged over 65 will increase by 33% over the next 25 years, and we would welcome an acknowledgement of this in terms of how it will impact on housing provisions and other forms of development.  00633/3/001 Strathclyde Partnership for Transport - Support for the key issues identified in the Plan and for the promotion of active travel. Concern regarding the identified issue of 'car borne trips' and the breakdown of this. There is a need to acknowledge the various types of car journeys and focus on specific journeys which are of most concern, particularly single occupancy vehicle trips and short trips.  00633/41/001 Strathclyde Partnership for Transport - It is noted that the City's Strategic Plan and Community Planning priorities have helped identify the City Challenges, identified on page 15. Mentioning these issues and priorities specifically here would assist in understanding the direct linkages between the Plan and these key documents.  00633/41/002 Strathclyde Partnership for Transport - A more direct read-across between the issues in the City Profiles and City Challenges would be beneficial.  00664/1/001 Clyde Gateway URC - The Commonwealth Games have provided a worldwide platform for the Clyde Gateway area to promote itself and secure new investment. NPF3 states that it is essential to build on the success already achieved to address nationally significant and longstanding issues of disadvantage. This message should come through in the Plan, at present it does not.  00818/1/002 Scottish Property Federation - There are many reasons to be optimistic		

about the prospects for sustainable economic growth in the City of Glasgow. Bearing this in mind, and the fact that the Plan acts as a prospectus for potential investment into the City, the City Challenges could be redrafted to reflect a continued respect for the risk averse nature of markets yet note the increased appetite for development evidenced in recent months.

#### **Modifications sought by those submitting representations:**

00442/7/001 Glasgow Centre for Population Health - Add text to recognise that changing demographic trends will have an impact on population needs and how this will impact on housing provisions and other forms of development.

00633/3/001 Strathclyde Partnership for Transport - Amend Environment Key Issues paragraph (p14) to read: "Key issues include enhancing the City's compact and sustainable form by addressing the significant areas of vacant and derelict land; addressing the significant number of single occupancy/short car borne journeys and promoting active travel and public transport and reducing the need to travel; and ensuring that the City is in a resilient position to respond to environmental and water management challenges in coming years."

00633/41/001 Strathclyde Partnership for Transport - Amend the text supporting the City Challenges (page 15) to make specific mention of the issues and priorities emerging from the City's Strategic Plan and Community Planning which have helped identify the City Challenges.

00633/41/002 Strathclyde Partnership for Transport - This section should provide a better read-across between the issues identified in the City Profiles and the Challenges set out in the City Challenges box on page 15.

00664/1/001 Clyde Gateway URC - The Plan should refer to the success of the Commonwealth Games and their legacy as a key factor for guiding future development and regeneration in the Clyde Gateway area.

00818/1/002 Scottish Property Federation - Amend the City Challenges (p15) to reflect a continued respect for the risk averse nature of markets yet note the increased appetite for development evidenced in recent months.

#### **Summary of responses (including reasons) by planning authority:**

##### Objecting

00442/7/001 Glasgow Centre for Population Health - A series of Background Papers (OC45, 46, 48, 50, 52, 67-74) was produced which directly informed the new Proposed Plan. These Background Papers related to the key policies in the Plan and documented all the relevant background, research and supporting material. Background Paper No.10: Meeting Housing Needs (OC73) included a section entitled Demographic Change (pages 6-7, paragraphs 4.22-4.26). The housing requirements set out in CDP 10 are derived from a Housing Need and Demand Assessment (HNDA) which was undertaken to inform the preparation of the 2012 Strategic Development Plan (CE6). The HNDA used population and household projections to 2035 to assess the need for new housing. Although the HNDA does not identify the elderly population as a specific group in terms of housing provision, Glasgow City Council prepares regular reports on demographic

change in the City. The most recent report - Recent and Projected Population and Household Change in Glasgow City in 1991-2037: Results from NRS 2012-base Population and Household Projections (OC20) was approved in September 2014. This Report notes the anticipated rise in the number of elderly people in Glasgow, and the potential implications that this may have for service provision and demand for new housing.

No modifications recommended.

00633/3/001 Strathclyde Partnership for Transport - The current level of car borne travel is a problem for Glasgow, not least in terms of congestion it causes and the air and noise pollution which it can create. Glasgow sits at the centre of a large conurbation and is the focus for many of its sustainable transport systems, which can provide effective alternatives to car-borne trips. Whilst single occupancy car trips (which give rise to higher levels of pollution per head) and short car trips (which might, most readily, be 'converted' to trips by active modes) can be the focus of action to reduce the problems associated with car-borne travel, it is considered that this doesn't mean that the Plan shouldn't also attempt to reduce other trips by car. Such an approach is consistent with paragraph 273 of Scottish Planning Policy (CE2), which indicates that Plans should 'promote development which maximises the extent to which its travel demands are met first through walking, then cycling, then public transport and finally through use of private cars.'

The profiles set out in the Plan contain fairly strong, easy to understand messages regarding the key issues which, it is considered, the Plan should address. It is considered that introducing the change suggested by the objector would introduce an unnecessary level of detail which could complicate the simple message about addressing car borne journeys, and would not accord with SPP.

No modifications recommended.

00633/41/001 Strathclyde Partnership for Transport - The intention with the Proposed Glasgow City Development Plan was always to keep the final document as short, brief and concise as possible. In order to achieve this, a decision was taken at an early stage not to repeat information published in other documents but instead to cross refer to these wherever possible. The document which is referred to in this representation (The City's Strategic Plan (OC31)) and the work of the Community Planning Partnership are clearly mentioned on Page 15 of the Plan and it is anticipated that following adoption, the online version of the Plan will include relevant, clickable web links.

No modifications recommended.

00633/41/002 Strathclyde Partnership for Transport - The City Profile section of the Plan provides a graphic, readily digested snapshot of Key Facts under the headings 'Social', 'Economic' and 'Physical' with a summation of all the related key issues. The Challenges Section on Page 15 states 'The key issues in the Profile, along with the City's Strategic Plan, and the priorities identified by the Community Planning Partnership, have helped identify the City Challenges listed below'. This statement already provides a clear link between the profiles, issues and challenges.

No modifications recommended.

00664/1/001 Clyde Gateway URC - It is considered that the modification sought is in line

with the broad aims and objectives of the Plan.

The Report could, if so minded, amend paragraph 'River Clyde' on page 20 to read: 'River Clyde. Support continued mixed used regeneration at Clyde Waterfront and Clyde Gateway, building on the success of the Commonwealth Games 2014'

00818/1/002 Scottish Property Federation - The City Challenges section on page 15 includes, amongst other things, the following two bullet points:

- the overall financial climate which is affecting private and public sector investment
- the need to prepare the City's business locations for today's economy and the economy that is emerging

These bullet points adequately encompass the points made in this representation.

No modifications recommended

### **Reporter's conclusions:**

#### Housing for the elderly

1. The council recognises the implications of the growth in the elderly population in Glasgow, which is highlighted in a recent council report addressing demographic change in the City. However, the housing requirements set out in the strategic development plan, which stem from a housing need and demand assessment, do not distinguish between different age groups. Similarly, the proposed local development plan requires to allocate sufficient land to meet housing needs, and Scottish Planning Policy does not expect there to be a specific allowance for elderly persons' accommodation. There is therefore no need to modify the Plan in the light of the representation.

#### Car-borne travel

2. I appreciate Strathclyde Partnership for Transport's argument that some car-borne trips, notably single occupancy and short trips, are of greatest concern as they contribute to pollution disproportionately. However, for the reasons stated by the council, I agree with that the problem is much wider than that, and that the Proposed Plan should aim to reduce car trips across the board. That stance is in line with Scottish Government policy set out in Scottish Planning Policy, which sets a hierarchy of sustainable modes with cars at the bottom. I see no reason to modify that aspect of the Proposed Plan.

#### City Challenges

3. In order to create a concise Plan as directed by the Scottish Government, the council is not able to detail all the documents which have informed its contents. I am satisfied that the reference to the City's Strategic Plan and the priorities identified by the Community Planning Partnership give sufficient background to the City Challenges listed in page 15.

4. Similarly I consider that the connection between the City Profile and the City Challenges is made clear on page 15.

5. I am not convinced that there is a need for additional detail on the nature of markets

and the appetite for development in this section of the Proposed Plan. There is further information on Glasgow's key economic sectors, including retail, engineering, higher education, financial and business services, and offices in page 35 and elsewhere in the Proposed Plan.

#### Clyde Gateway

6. The role of the Commonwealth Games legacy as a key factor in guiding future development and regeneration is highlighted in National Planning Framework 3, which recognises that *"there has already been excellent progress in the regeneration of the Clyde Gateway, an ambitious transformational project where there has been outstanding progress to date. We are confident that the long-term vision for regeneration in this area, delivered through partnership working and involving local people, agencies and developers, provides a strong foundation to attract investment."*

7. It is important that this pivotal role is recognised in the Proposed Plan, and I am content that the council's suggested wording would achieve that.

#### **Reporter's recommendations:**

Modify paragraph 'River Clyde' on page 20 to read:

*"River Clyde*

*Support continued mixed use regeneration at Clyde Waterfront and Clyde Gateway, building on the success of the Commonwealth Games 2014."*



Issue 03		Strategic Approach and Key Aims	
Development plan reference:		Strategic Approach (Pages 16-25)	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):			
East Dunbartonshire Council (00411) Garnethill Community Council (00450) Retail Property Holdings (RPH) (00491) Whitbread plc (00500) Wheatley Group (00501) Christ's Hospital Foundation (00631) Strathclyde Partnership for Transport (00633) Dennistoun Community Council (00634) George Capital LLP (00636) Scottish Property Federation (00818)			
Provision of the development plan to which the issue relates:		The Strategic Approach identifies two Key Aims and sets out the Strategy which seeks to achieve these Key Aims and address the main challenges identified earlier in the Plan. The Strategy seeks to deliver on four strategic outcomes: <ul style="list-style-type: none"><li>• a vibrant place</li><li>• a sustainable place</li><li>• a connected place</li><li>• a green place</li></ul> These four strategic outcomes shape the policies and proposals in the Plan and influence the location and form of development.	
Planning authority's summary of the representation(s):			
<u>Objecting</u>  00450/2/001 Garnethill Community Council - There is a need for clarification on the purpose of the document to explain some of the apparent contradictions in the draft Plan. For example, page 5 says "the Plan aims to give certainty for investment decisions" whilst page 17 states that there are two strategic aims: "creating and maintaining a high quality, healthy place" and "developing a compact city that supports sustainable development."  00501/2/001 Wheatley Group - Wheatley strongly supports the strategic approach proposed in the Plan as the most effective way to make best use of scarce public resources and to direct private investment in the most fruitful way. However, we would suggest that the Plan would be strengthened if there was more explicit recognition of the impact of the current economic conditions challenges on the ability of all sectors to translate strategic intentions into investment in bricks and mortar. Wheatley is aiming to bring significant additionality to housing investment in the City through the issue of a £200m bond. We would suggest that the Plan would benefit from a sharper focus on established priorities as areas where resources should be concentrated in the early years of the Plan period to ensure delivery of the aims and objectives. In the case of the Plan's housing priorities, we would suggest that a focus should be on the Transitional			

Regeneration Areas (TRAs) and the work of our special purpose vehicle Transforming Communities: Glasgow (TCG) should have the highest priority.

00633/4/001 Strathclyde Partnership for Transport - Connections to education and healthcare are important in meeting the aims of the Plan. The development of an integrated and efficient transport network will encourage sustainable travel behaviour and improve accessibility.

00633/5/001 Strathclyde Partnership for Transport - Page 20 - A Vibrant Place - Clarification should be provided on how the Plan defines a sustainable location. Good accessibility by a variety of transport modes is considered a key component of a sustainable location.

00633/6/001 Strathclyde Partnership for Transport - The Plan should reflect the fact that accessibility and movement are key components of the Plan in terms of design, town centres, choice and community.

00633/35/001 Strathclyde Partnership for Transport - Modification required to aid understanding of what Figure 5 is representing.

00634/4/001 Dennistoun Community Council - Glasgow's status as a 'Future City' and a City that promotes digital inclusion should be better recognised in the Plan. The emerging opportunities for activity and employment allied to digital network media should also be reflected (including an analysis of broadband capacity across Glasgow).

#### Supporting

00411/3/002 East Dunbartonshire Council - We strongly support the two 'Key Aims' set out on page 17. It is our opinion that the local development plan system has a key role in promoting and facilitating high quality and healthy places to improve quality of life for everyone.

00491/1/001 Retail Property Holdings (RPH) - Support for Key Aims 1 and 2 of the Plan with respect to creating a high quality healthy place and a sustainable compact city form. Well connected, vibrant town centres should be at the heart of the strategy to create a compact and sustainable city, and should be the preferred location and focus of new development across a range of uses. This is particularly the case for Pollok where land within and adjacent to the town centre can be developed to accommodate a greater density of development at a sustainable location.

00491/4/001 Retail Property Holdings (RPH) - Supports the intent to create vibrant town centres to help provide a good quality of life. Town centres should be the focus for diverse community growth and should support intensification of development in appropriate town centre locations. This is particularly the case for Pollok which has the ability to accommodate a significant level of growth.

00631/2/001 Christ's Hospital Foundation - Supports the overall strategy for Glasgow as set out in the Plan, which seeks to keep Glasgow at the heart of Scotland's future and allow it to make the most of its resources. In particular, support is given for strategic outcomes:

- a vibrant place with a growing economy
- a thriving and sustainable place to live and work

00633/8/001 Strathclyde Partnership for Transport - Supports the Strategic Outcome of 'A Green Place' (page 23), particularly the continued safeguarding of the Greenbelt and the objective to direct new development towards brownfield land, which is likely to be more accessible than greenfield land.

00636/3/001 George Capital LLP - Supports the key aims of the Plan to create; a vibrant place and growing economy, a thriving and sustainable place to live and work, a connected place to move around and do business in, and a green place. Support the reference to supporting the City Centre's major employment role including retail, financial and business services, higher education, tourism and other complementary and supporting functions that befit a World Class City.

00500/11/001 Whitbread plc - Supports the overall strategic outcomes of making Glasgow: A vibrant place with a growing economy; A thriving and sustainable place to live and work; A connected place to move around and do business in; and A green place. Supports the Council's plans to build on the City's reputation as a City break/business tourism destination and on its ability to host major international events.

00501/9/001 Wheatley Group - Wheatley welcomes the Plan and strongly supports the aims and objectives of the plan.

00818/4/003 Scottish Property Federation - Supports the identification of the growth corridor linking the Clyde Waterfront, the City and Clyde Gateway and believes that it is already attracting successful investment that can be enhanced.

#### **Modifications sought by those submitting representations:**

00450/2/001 Garnethill Community Council - Additional text is required to clarify the purpose of the Plan.

00501/2/001 Wheatley Group - The Plan should have a sharper focus on established priorities as areas where resources should be concentrated in the early years of the plan period - the Transitional Regeneration Areas and the special purpose vehicle Transforming Communities: Glasgow (TCG) should have the highest priority.

00633/4/001 Strathclyde Partnership for Transport - Page 17 - Suggested change to "A connected place to move around and do business in" key aim. Add "education and healthcare" after employment, and "creating an integrated and efficient transport network" at the end of the paragraph to read: "A connected place to move around and do business in - by improving accessibility for all citizens to employment, education, healthcare, shopping and leisure destinations, providing more sustainable travel options and creating an integrated and efficient transport network;"

00633/5/001 Strathclyde Partnership for Transport - Update the Vibrant Place Strategic Outcome (page 20) to provide clarity of what a "sustainable location" is, perhaps in the Glossary.

00633/6/001 Strathclyde Partnership for Transport - Amend the Sustainable Place strategic outcome to read: "We want to achieve a City that is made up of sustainable, vibrant and distinctive places which are well-designed, accessible, safe, healthy and inclusive and which provide for the City's growing and diverse population".

00633/35/001 Strathclyde Partnership for Transport - Move supporting text for Figure 5 from page 24 to page 25.

00634/4/001 Dennistoun Community Council - The Plan should recognise Glasgow's status as a 'Future City' and a City that promotes digital inclusion. It should also highlight emerging opportunities for activity and employment allied to digital network media.

**Summary of responses (including reasons) by planning authority:**

Objecting

00450/2/001 Garnethill Community Council - The purpose of the document is clearly explained in the 'Introduction' on page 5. The Proposed Plan was prepared to reflect the Scottish Government's National Planning Framework (NPPF2) (CE21) and Scottish Planning Policy (SPP) (February 2010) (CE3).

Both documents have since been revised (NPPF3 (CE1) and SPP (June 2014) (CE2)), yet the Plan remains consistent with them in that it promotes a positive framework for economic growth balanced with delivering sustainable and quality places. The key aims of the Plan are also consistent with the key principles of the revised SPP i.e. there is a focus on placemaking and sustainable development.

No modifications recommended.

00501/2/001 Wheatley Group - The proposed Strategic Development Frameworks and Local Development Frameworks will provide a spatial context for future development in specific areas of the City. These Frameworks are not intended to undermine existing priority areas. Indeed, by outlining a shared vision and future development intentions for the wider area, they should provide certainty for investment decisions including the delivery of existing regeneration priority areas.

The Action Programme, which accompanies the Plan, also highlights timescales and funding arrangements to ensure there is no conflict.

The Reporter could, if so minded, amend the Plan by adding the following text at the end of the Context section of Policy CDP 2 (page 32) to ensure the Plan is clear that existing regeneration areas remain top priorities:

"The proposed Strategic Development Frameworks and Local Development Frameworks will provide a spatial context for future development in specific areas of the City. By outlining a shared vision and future development intentions for the wider area, it is anticipated that the Framework will provide certainty for investment decisions including the delivery of existing regeneration priority areas."

00633/4/001 Strathclyde Partnership for Transport - The suggested amendment is in line with the broad aims and objectives of the Plan.

The Reporter could, if so minded, amend the text supporting the Strategic Outcome "A connected place to move around and do business in" to read: "by improving accessibility for all citizens to employment, education, healthcare, shopping and leisure destinations, providing more sustainable travel options and creating an integrated and efficient transport network;"

00633/5/001 Strathclyde Partnership for Transport - The suggested modification is in line with the broad aims and objectives of the Plan.

The Reporter could, if so minded, add the following definition to the Glossary to read: 'Sustainable Locations. Areas of the City where higher density development will be encouraged in order to make most efficient use of the City's infrastructure and services.'

00633/6/001 Strathclyde Partnership for Transport - The suggested modification is in line with the broad aims and objectives of the Plan.

The Reporter could, if so minded, add the word 'accessible' to the 'thriving and sustainable place to live and work' strategic outcome to read: "We want to achieve a City that is made up of sustainable, vibrant and distinctive places which are well-designed, accessible, safe, healthy and inclusive and which provide for the City's growing and diverse population".

00633/35/001 Strathclyde Partnership for Transport - The format of the final version of the Plan will ensure that the supporting text is well positioned in relation to Figure 5.

No modifications recommended.

00634/4/001 Dennistoun Community Council - Glasgow's status as a Future City is not confirmed for the duration of the Plan period and it is, therefore, not considered prudent to include this in the Plan.

No modifications recommended.

### **Reporter's conclusions:**

#### The purpose of the Proposed Plan

1. I agree with the council that the Proposed Plan's purpose is made clear in the Introduction at page 5. I see no contradiction between the Proposed Plan's aim which is expressed in page 5 "*to give certainty for investment decisions*", and the two strategic aims: "*creating and maintaining a high quality, healthy place*" and "*developing a compact city form that supports sustainable development*".

2. I also accept that the strategic aims of the Proposed Plan are compatible with the four planning outcomes and the policy principles set out in Scottish Planning Policy (published in June 2014), which include improving health and wellbeing and having regard to the principles of sustainable land use. In addition, they are consistent with Ministers' vision for Scotland which is outlined in National Planning Framework 3.

#### Focus on established priorities

3. I can appreciate the demand for the Proposed Plan to focus more explicitly on concentrating resources on established priorities, and especially the Transitional Regeneration Areas, in the light of current economic conditions. Whilst I accept that the Plan and Action Programme do not conflict with those priorities, I agree it would be appropriate to modify the Proposed Plan to clarify the point.

Connectivity, accessibility and movement

4. I acknowledge that the Proposed Plan would benefit from the changes suggested by Strathclyde Partnership for Transport, which highlight the value of connections to education and healthcare, and of an integrated and efficient transport network; the need to encourage sustainable travel behaviour; and the significance of accessibility and movement in relation to design, town centres, choice and community. It would also be worthwhile to define the key term 'sustainable location'. I note the council's assurance that the supporting text will be better positioned in relation to Figure 5.

Digital inclusion

5. The Proposed Plan makes clear at page 22 that the council wants to achieve a City where "*residents have good access to physical and digital infrastructure*". On the same page support is given to "*the development of digital connections to allow mobile working and local businesses to flourish*". Reference is made in page 36 to the aim to secure "*better access to the internet and information technology for businesses and residents*". I am therefore satisfied that the Proposed Plan attaches due priority to the importance of digital inclusion.

Supporting representations

6. I note the representations in support of the Plan which are summarised above, but none raise any unresolved issues which I require to examine.

**Reporter's recommendations:**

Modify the Proposed Plan by adding the following text at the end of the Context section of Policy CDP 2 (page 32):

*"The proposed Strategic Development Frameworks and Local Development Frameworks will provide a spatial context for future development in specific areas of the City. By outlining a shared vision and future development intentions for the wider area, it is anticipated that the Frameworks will provide certainty for investment decisions including the delivery of existing regeneration priority areas."*

Modify the text supporting the Strategic Outcome 'A connected place to move around and do business in' to read:

*"by improving accessibility for all citizens to employment, education, healthcare, shopping and leisure destinations, providing more sustainable travel options and creating an integrated and efficient transport network."*

Modify the Proposed Plan by adding the following definition to the Glossary to read:

*"Sustainable Locations. Areas of the City where higher density development will be encouraged in order to make most efficient use of the City's infrastructure and services."*

Modify the Proposed Plan by adding the word 'accessible' to the 'thriving and sustainable place to live and work' strategic outcome to read:

*"We want to achieve a City that is made up of sustainable, vibrant and distinctive places which are well-designed, accessible, safe, healthy and inclusive, and which provide for the City's growing and diverse population."*

Issue 04	The Placemaking Principle	
Development plan reference:	Policy CDP1 The Placemaking Principle (Pages 29-31)	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
<div><div>East Dunbartonshire Council (00411) The Coal Authority (00426) Sportscotland (00429) Glasgow Centre for Population Health (00442) Hillhead Community Council (00479) Retail Property Holdings (RPH) (00491) Persimmon Homes (00497) Wheatley Group (00501) Broomhill Community Council (00563) St Enoch Trustee Company Ltd (00597)</div><div>Say No To Tesco in Scotland (00599) Pollokshields Community Council (00609) Yorkhill and Kelvingrove Community Council (00623) Barrett Homes West Scotland (00627) Christ's Hospital Foundation (00631) Strathclyde Partnership for Transport (00633) George Capital LLP (00636) Dowanhill Hyndland and Kelvinside Community Council (00637)</div></div>		
Provision of the development plan to which the issue relates:	Policy CDP1 - The Placemaking Principle is one of two overarching policies in the Plan which all development proposals must consider in order to achieve the Plan's Key Aims. This Policy aims to achieve the six qualities of place, as defined in SPP, and to improve the quality of development taking place in Glasgow by promoting a design led approach which contributes towards making the City a better place to live and work.	
Planning authority's summary of the representation(s):		
<p><u>The General Placemaking Principle</u></p> <p><u>Objecting</u></p> <p>00426/1/001 The Coal Authority - Approximately 30% of Glasgow is within The Coal Authority Development High Risk Area. In these areas, new development proposals are at significant risk from a range of mining legacy features that render the ground potentially unstable. Mine entries and mining legacy matters should be considered in the Plan to ensure that site allocations and other policies and programmes do not lead to future public safety hazards and new development recognises mining issues and how they can be positively addressed. Unstable land needs to be highlighted through planning policy to enable the issue to be considered at an early stage in the development process and to ensure that developers take account of the risks associated with unstable land.</p> <p>00442/1/003 Glasgow Centre for Population Health - We would like to see a commitment to delivering more effective community engagement, with a firm statement in support of development proposals from community groups, and a commitment from the Council to work alongside community groups to help facilitate asset transfers or the creation of small scale proposals, where possible.</p> <p>00479/9/001 Hillhead Community Council - The aims of policy CDP1 appear laudable but are so broad as to need much more elaboration, particularly on air quality and transport.</p>		

The Figures are not helpful and are difficult to relate to particular areas.

00479/35/001 Hillhead Community Council - There is insufficient information on education and forward planning. Concerns include; catchment areas being too large; young children travelling too far from home (entailing use of cars); viable schools being sold off; and eyesore extensions being permitted at the expense of play space. Little thought has been given to the relationship between primary and secondary places, access for deliveries and parental behaviour in the collection of children. Guidelines in the Plan should remedy these defects and the standard of school building (green roofs, adequate play space, sustainable and contextually sensitive design) should be the subject of robust planning guidance.

00479/35/002 Hillhead Community Council - Further education campus plans should be available and consulted on before being incorporated into the development plan in principle. There should be policies to deal with the location and type of accommodation and the impact of further and higher education establishments on other aspects of the Plan should be assessed.

00501/1/001 Wheatley Group - Support for the Placemaking principle in the Plan. Much of Glasgow's regeneration challenge resides in areas where the physical fabric no longer provides a successful context for current and future social and economic conditions. Through partnership working, restructuring of the City's residential neighbourhoods is already underway in order to promote health, wellbeing and sense of place.

00631/1/001 Christ's Hospital Foundation - Welcomes the broad aims of policy CDP 1 and its commitment to bringing vacant and derelict land back into effective use. However, the policy does not provide the appropriate support for Economic Development Areas and should be expanded to allow for the use of underutilised EDAs for alternative uses, such as residential.

00633/10/001 Strathclyde Partnership for Transport - Support for Policy CDP1. Movement within and between places is essential for creating successful places that link well with surrounding settlements and are easy to move around. Public transport and active travel should be mentioned specifically in Policy CDP1 in order to ensure that new development gives adequate recognition to these, particularly the operational requirements of bus services. The Council's "Design Guide for New Residential Areas" also has a role to play here and should be referenced within Policy CDP1.

00633/10/002 Strathclyde Partnership for Transport - Supports the use of the Healthy Sustainable Neighbourhood model and a joined up approach. Changes suggested to reflect the relationship between this policy and CDP4 and to aid the read-across throughout the document.

### Supporting

00411/4/001 East Dunbartonshire Council - Agrees that the planning system has a central role in improving the health and wellbeing of everyone in Scotland and the prominence given to this in Policy CPD1 is welcomed. Also supports the principle of a 'compact city form' that supports sustainable development. This means prioritising brownfield development and ensuring that sustainability is a central factor in the assessment of proposed development locations.



00429/14/001 Sportscotland - Support for Policy CDP1: The Placemaking Principle and its recognition of the importance of health, healthy lifestyles and community facilities in the context of using a placemaking principle to guide development.

00491/5/001 Retail Property Holdings (RPH) - Support for the placemaking principle as a starting point for new development proposals and support for creation of supporting detailed Supplementary Guidance.

00563/1/001 Broomhill Community Council - Support for the aspirations detailed in Policy CDP1: Placemaking, particularly in relation to embedding community facilities in communities and recognising the needs of all members of society.

00597/3/001 St Enoch Trustee Company Ltd - Supports the expectation that new development should be design-led to contribute towards making the City a better and healthier environment to live in and should aspire towards the highest standards of design. Welcomes the opportunity to review the Supplementary Guidance.

00599/2/001 Say No To Tesco In Scotland - Supports the CDP's aim to enhance the sustainability and wellbeing of Glasgow and its people by encouraging more horticulture within the City. This can help mitigate and adapt to climate change.

00609/1/001 Pollokshields Community Council - Support for Policy CDP1 The Placemaking Principle and the promotion of design and health which is seen as central to the policy and at the core of the Council's expectations with regards to new developments.

00623/8/001 Yorkhill and Kelvingrove Community Council - Support Policy CDP1. The encouragement of sensitive and creative flair will be very important to the future of the City. For this to be successful, a spread of design-trained officers will be needed at all levels of the planning system. Special training and recruitment must, therefore, be seen as a top priority.

00627/1/001 Barrett Homes West Scotland - Support for the aims and objectives of Policy CDP1: Placemaking and in particular, the design led approach. In order to facilitate such development, however, it is necessary for all Council departments to be fully engaged with the policy. This type of engagement will lead to effective consultation being made during the statutory period and determination targets being met.

00636/12/001 George Capital LLP - Support the design-led approach to planning set out in Policy CDP1 and believe that any new development should be well designed and add to the sense of place. George Capital intend that their redevelopment plans at Bath St/West Nile St would support the six qualities of place outlined in policy CDP1.

00637/2/001 Dowanhill Hyndland and Kelvinside Community Council - Support for the Plan's approach to use placemaking toolkits and guides to support placemaking, particularly where these toolkits can be used by communities.

00637/3/001 Dowanhill Hyndland and Kelvinside Community Council - Support for Policy CDP1: Placemaking and the recognition of the importance of health, placemaking and wellbeing. There is a changing culture and raising awareness and offering capacity building opportunities for communities to develop themselves is welcomed.

Noise Management AreaObjecting

00479/22/001 Hillhead Community Council - A definition is needed of both noise protection areas and quiet areas. There needs to be an explanation of how they are defined and differentiated from other areas which would seem eligible.

00479/22/002 Hillhead Community Council - Other areas, other than the noise protection areas quiet areas shown on Figure 7, need to be protected from noise, including noisy streets in residential areas and town centres, all parks and other areas that suffer acutely from noise on a regular basis.

00479/22/003 Hillhead Community Council - The Plan should include a policy for promoting noise reduction in all areas, particularly where there are currently no policies or specific legislation to cover contingencies. This would fit with the desire in the plan to improve health, sense of place and community and to develop community support for the plan and community involvement.

HealthObjecting

00442/1/001 Glasgow Centre for Population Health - Welcomes the inclusion of a Placemaking principle, and pleased that it will apply to all forms of development. This represents significant progress as it recognises the importance of how development decisions are made, as well as the value in encouraging more participation from local people. Policy CDP1 should specify that developers will be expected to demonstrate how they intend to improve the health of people affected by a proposed development, as well as what impact it could have on existing inequalities in health.

00497/8/001 Persimmon Homes - Policy CDP1 outlines a number of non-statutory requirements in respect of the assessment of planning applications. This policy could be used to slow down the decision making process and be used as a stick to force unnecessary changes to the content of applications, particularly in relation to the layouts of residential developments which already require to be assessed against the adopted Residential Design Guide. The Neighbourhoods Model is not considered necessary or relevant in assessing major new development.

Traffic ManagementObjecting

00479/12/004 Hillhead Community Council - Active measures are required to prevent commuter traffic coming to the Partick hub. Parking should be prevented at this Hub or in Partick's Side streets. It is noted that park and ride places are provided to the east and south of the City but not the West and North. This is counterproductive.

00479/12/005 Hillhead Community Council - Traffic management measures are required to divert traffic from polluted streets, including controlling routes and preventing access from certain streets. Unnecessary traffic could be discouraged by closures to all or certain vehicles. Additional "residents only" parking would help discourage cars. More

use should be made of traffic studies to determine the causes of additional traffic and how to route it or control it.

**Modifications sought by those submitting representations:**

The General Placemaking Principle

00426/1/001 The Coal Authority - Amend Policy CDP1 by including an additional criterion to read: "Ensuring new development takes account of ground conditions including instability".

00442/1/003 Glasgow Centre for Population Health - The Plan should contain a statement which demonstrates support for community engagement and community-based proposals.

00479/9/001 Hillhead Community Council - Policy CDP1 should include further clarification and detail, particularly in relation to Figures 6 and 7.

00479/35/001 Hillhead Community Council - The Plan should include robust planning guidance relating to the location and design of schools.

00479/35/002 Hillhead Community Council - The Plan should state that further education campus plans should be available and consulted on before being incorporated into the development plan and that the impact of further and higher education establishments on other aspects of the development plan should be assessed.

00501/1/001 Wheatley Group - The Plan should more explicitly recognise the impact of current economic conditions and challenges on the ability of all sectors to translate strategic intentions into investment, including a sharper focus on established priorities as areas where resources should be concentrated in the early years of the Plan.

00631/1/001 Christ's Hospital Foundation - The policy should be amended to allow for the use of underutilised Economic Development Areas for alternative uses, such as residential.

00633/10/001 Strathclyde Partnership for Transport - Amend policy CDP1 by: rewording main bullet point 10, to read: "Promoting connectivity, active travel and public transport use rather than private car use" rather than "Promoting connectivity and active travel rather than motorised journeys;" and by making reference to the Design Guide for New Residential Areas.

00633/10/002 Strathclyde Partnership for Transport - Amend Policy CDP1 by replacing main bullet point 2 with new text, to read: "Embedding community facilities and local shopping facilities in communities and recognising the needs of all members of society; (refer to Policies CDP 4: Network of Centres).

Noise Management Area

00479/22/001 Hillhead Community Council - The Plan should include a definition of both noise protection areas and quiet areas and an explanation of how are they defined.

00479/22/002 Hillhead Community Council - The Plan should identify other areas, other than the noise protection areas quiet areas shown on Figure 7, to be protected from noise.

00479/22/003 Hillhead Community Council - The Plan should include a policy for promoting noise reduction in all areas of the City.

### Health

00442/1/001 Glasgow Centre for Population Health - Policy CDP1 should require developers to demonstrate how a development will improve the health of people affected by the development as well as what impact it has on health inequality.

00497/8/001 Persimmon Homes - Policy CDP1: Placemaking should be amended to reference relevant supplementary guidance and to remove any text which has the potential to slow down the decision making process, including the following bullet point: "Assessing major developments using the Glasgow Healthy Sustainable Neighbourhood Model and demonstrating healthy outcomes have been considered (via application forms)."

### Traffic Management

00479/12/004 Hillhead Community Council - The Plan should include measures to prevent commuter traffic coming to the Partick hub. The Plan should provide for Park and ride places to the West and North of the City.

00479/12/005 Hillhead Community Council - The Plan should promote traffic management measures to divert and control traffic, including street closures and additional 'residents only' parking.

## **Summary of responses (including reasons) by planning authority:**

### The General Placemaking Principle

#### Objecting

00426/1/001 The Coal Authority - Coal Authority Development High Risk Areas are currently identified, in the Council's GIS datasets, as a constraint on development. This informs the Development Management process. This means that applicants for proposals for new development on sites identified as being within a High Risk Area are alerted to the fact and are routinely required to submit a coal report to support their application. There would appear to be merit in making this approach more visible in the Plan.

The Reporter could, if so minded, amend Policy CDP 5: Resource Management, by inserting new text after the bullet points following paragraph 2, to read: 'Development proposals in some parts of the City may be at risk from unstable ground, a legacy of previous mining works. The Coal Authority publishes maps of such areas and development proposals in these parts of the City may require to be accompanied by a Coal Report to help determine how development may best proceed.'

This would not have any implications for the LDP strategy but would reflect current practice.

00442/1/003 Glasgow Centre for Population Health - Policy CDP 1 - The Placemaking Principle acknowledges the importance of effective community engagement. It describes how successful placemaking relies on a meaningful dialogue with stakeholders and effective engagement with communities in order to harness local knowledge and better understand how new development can be successfully integrated. In addition, Policy CDP1 expects new development to demonstrate efforts 'to responsively engage with all stakeholders'.

No modifications recommended.

00479/9/001 Hillhead Community Council - Policy CDP1 - The Placemaking Principle, which seeks to create and maintain high quality, healthy places, is one of two overarching policies in the Plan. Further detail will be provided in the Placemaking Supplementary Guidance which will be adopted alongside the Plan. See Issue 54 for further information.

No modifications recommended.

00479/35/001 Hillhead Community Council - Beyond the design of new school buildings, which are discussed at the planning application stage, these are not planning related matters.

No modifications recommended.

00479/35/002 Hillhead Community Council - The Plan is supportive of Campus Plans. These are shown on the Policy and Proposals map as Masterplan Areas.

No modifications recommended.

00501/1/001 Wheatley Group - Policy CDP 1- The Placemaking Principle, which seeks to create and maintain high quality, healthy places, is one of two overarching policies in the Plan. The other overarching policy, CDP2 - Sustainable Spatial Strategy seeks to provide a spatial representation of the Plan's Strategy and recognises that intervention is required in some parts of the City. Policy CDP1 should be read in conjunction with Policy CDP2.

Policy CDP2 states that Spatial Supplementary Guidance will be prepared for those priority areas identified in the Sustainable Spatial Strategy in the form of Strategic and Local Development Frameworks. Six Strategic Development Framework Areas have been identified and three Local Development Framework Areas. In most cases the need for these Frameworks has been identified as a result of changed circumstances such as the need to refresh efforts to support regeneration which has been hampered by the economic downturn.

No modifications recommended.

00631/1/001 Christ's Hospital Foundation - Policy CDP1 - The Placemaking Principle and Policy CDP2 - Sustainable Spatial Strategy are overarching policies which must be considered for all development proposals in order to help achieve the aims of the Plan. Policies CDP3 to CDP12 provide more detail on the specific land use elements which contribute to meeting the requirements of the overarching policies.

Policy CDP3 - Economic Development and the Economic Development Supplementary Guidance, which will be adopted alongside the Plan, will provide all the detail about the

Review of the City's Economic Development Areas. See Issue 54 for further information.

No modifications recommended.

00633/10/001 Strathclyde Partnership for Transport - The existing bullet 10 in Policy CDP1 does appear to imply a bias against 'motorised journeys', which could be seen as including bus travel.

In relation to making a reference in Policy CDP1 to the Design Guide for New Residential Areas (OC34). See Issue 54 for further information.

The Reporter could, if so minded, amend Policy CDP1, bullet point 10, to read:

"Promoting connectivity, active travel and public transport use rather than private car use".

00633/10/002 Strathclyde Partnership for Transport - A revised bullet point, along the lines suggested, could better reflect the relationship between Policies CDP1 and CDP4 and help to improve cross referencing generally through the Plan.

The Reporter could, if so minded, amend Policy CDP10, bullet point 2, to read:

"Embedding community facilities and local shopping facilities in communities and recognising the needs of all members of society; (refer to Policies CDP4: Network of Centres)".

### Noise Management Area

#### Objecting

00479/22/001 Hillhead Community Council - Noise Management Areas and Quiet Areas are designated under separate legislation. The Main Issue Report (CE8), which preceded the Plan, explains how Noise Management and Quiet Areas were defined in Glasgow (Issue 4.9). The extent of these areas, which could change over time, is shown in the Plan and detailed boundaries will be set out in Supplementary Guidance.

No modifications recommended.

00479/22/002, 00479/22/003 Hillhead Community Council - Policy CDP1 - The Placemaking Principle expects new development, amongst other things, to ensure that new activity does not introduce unacceptable additional noise particularly in, or adjacent to, Noise Management Areas nor have an adverse effect on Quiet Areas. The Policy as it currently stands, therefore, already seeks to protect all areas from unacceptable levels of noise.

No modifications recommended.

### Health

#### Objecting

00442/1/001 Glasgow Centre for Population Health - Policy CDP1 - The Placemaking Principle acknowledges that Glasgow, more than any other Scottish city, must continue to

give increased priority to the potential health outcomes that successful placemaking can deliver. Policy CDP1 seeks to put health at the centre of its aspirations and to make a significant contribution to improving the health and well-being of Glasgow citizens by taking a creative and holistic approach to regenerating buildings, sites and areas. In this way it is anticipated that outcomes will be more successful and sustainable and will include health improvements and a reduction in health inequalities.

In order to achieve the Plan's aim of creating and maintaining a high quality healthy place, Policy CDP1 will be applied to all development proposals throughout the City. It is intended that there will be an obligation for developers to demonstrate how Placemaking will be applied within their schemes and proposals. Further details on this obligation will be detailed in Supplementary Guidance. See Issue 54 for further information.

In addition, all major developments will be assessed using the Glasgow Healthy Sustainable Neighbourhood Model, contained in the policy, and developers will be asked to demonstrate how healthy outcomes have been considered.

No modifications recommended.

00497/8/001 Persimmon Homes - The Council considers the planning system to be crucial in addressing existing health inequalities in Glasgow. The creation of well-designed and connected neighbourhoods is seen as a key contributing factor to improving the health and wellbeing of everyone living and working in Glasgow.

Policy CDP1 - The Placemaking Principle acknowledges that Glasgow, more than any other Scottish city, must continue to give increased priority to the potential health outcomes that successful placemaking can deliver. Policy CDP1 seeks to put health at the centre of its aspirations and to make a significant contribution to improving the health and wellbeing of Glasgow citizens by taking a creative and holistic approach to regenerating buildings, sites and areas. In this way it is anticipated that outcomes will be more successful and sustainable and will include health improvements and a reduction in health inequalities.

In order to achieve the Plan's aim of creating and maintaining a high quality healthy place, Policy CDP1 will be applied to all development proposals throughout the City. It is intended that there will be an obligation for developers to demonstrate how Placemaking will be applied within their schemes and proposals. Further details on this obligation will be supplied in Supplementary Guidance. See Issue 54 for further information.

In addition, all major developments will be assessed using the Glasgow Healthy Sustainable Neighbourhood Model, contained in the policy, and asked to demonstrate that healthy outcomes have been considered.

The existing Residential Design Guide (OC34) is a material consideration and will require to be up-dated to reflect Policy CDP1, as well as other Scottish Government Guidance, before the Council can adopt it as part of the suite of Supplementary Guidance.

No modifications recommended.

Traffic ManagementObjecting

00479/12/004, 00479/12/005 Hillhead Community Council - Policy CDP1 - The Placemaking Principle and Policy CDP2 - Sustainable Spatial Strategy are overarching policies which must be considered for all development proposals in order to help achieve the aims of the Plan.

Policy CDP1 expects development to be design led and to contribute towards making the City a better and healthier environment by, amongst other things, promoting connectivity and active travel rather than motorised journeys.

Policy CDP2 supports development proposals that contribute towards the development of an active travel network and enhanced public transport accessibility within and between neighbourhoods, town centres and major employment locations.

In addition, the Plan proposes that Spatial Supplementary Guidance, in the form of a Strategic Development Framework (SDF), will be prepared for a number of areas in the City, including Govan/Partick. The Govan/Partick SDF will respond to the context of the local area and the local issues which are identified.

Some of the matters identified, for example in relation to, parking, park and ride and electric shuttle buses are not planning related matters.

No modifications recommended.

**Reporter's conclusions:**Mining legacy

1. It is well known that past coal mining activity within the Glasgow City Council area has left a legacy of potential land instability and other public safety issues. Over 900 recorded mine entries and around 75 coal mining related hazards in the City have been reported to the Coal Authority.

2. It is important that mine entries and mining legacy matters are taken into account by developers and the council when considering new development. That indicates that the Proposed Plan should highlight the issue, so that it is taken on board at the earliest stage in the development process, in the interests of public health and safety. The suggested amendment to the Proposed Plan would achieve that objective.

Community engagement and community proposals

3. I am satisfied that Policy CDP1 The Placemaking Principle properly recognises the key role of community engagement and community proposals, as one of its objectives is "*demonstrating efforts to responsibly engage with all stakeholders*". The supporting text at page 29 explains that placemaking "*..relies on a meaningful dialogue with stakeholders and effective engagement with communities in order to harness local knowledge and understand how new development can be successfully integrated.*" Moreover, the Glasgow Healthy Sustainable Neighbourhood Model (shown on page 30) is intended to help ensure that people and communities are at the centre of decisions. I therefore see



no need to modify the Proposed Plan to highlight the point further.

Lack of detail/figures unclear

4. I can understand the comment that the aims are expressed in broad terms, and that the figures are somewhat hard to read. However, this section of the Proposed Plan is intended to be conceptual, with the detail set out in the more specific policies later in the Plan, and in Supplementary Guidance. I consider that the approach adopted in the Proposed Plan is consistent with Scottish Ministers' expectation that local development plans should be "*..concise, map-based documents, making use of plain language and a range of graphical techniques to convey the strategy and individual policies and proposals in an accessible way*" (Planning Circular 6/2013: Development Planning). Detailed policies may be set out in Supplementary Guidance, where the main principles are already established in the Proposed Plan, as here.

Education provision

5. I acknowledge that the Proposed Plan does not contain guidance on the location and design of schools. However most of the issues raised in the representation, including catchment areas, the selling off of school sites, and parental behaviour, are not questions to be addressed in the Proposed Plan. Detailed design matters can be considered in Supplementary Guidance (see Issue 54).

6. Nonetheless the Proposed Plan does incorporate further education campus plans, which are shown on the Policy and Proposals Map as Masterplan Areas. It is also intended that supplementary guidance will include advice on higher and further education (see Issue 54).

Regeneration

7. The need to regenerate a number of residential neighbourhoods in the City is explicitly recognised in Policy CDP2 – Sustainable Spatial Strategy. The supporting text at page 32 explains the purpose of Strategic Development Frameworks (SDFs) and Local Development Frameworks (LDFs), and notes that six priority areas have been identified as requiring an SDF. The Policy makes clear that the council will continue to focus on the regeneration and redevelopment of the existing urban area. I therefore see no need for further clarification on this point.

Economic Development Areas

8. I consider Economic Development Areas elsewhere under Issue 10, where I recommend that the council carries out an early review of the Proposed Plan to reappraise the Economic Development Areas throughout the City, in accordance with the advice contained in paragraph 123 of Circular 6/2013: Development Planning. The review will look at a range of factors including physical condition, infrastructure provision, and demand potential, as well as the availability of marketable land. It will also identify areas which may provide opportunities for the planned integration of other land uses. In that context I do not consider that it is appropriate to amend Policy CDP1 in response to the point made in the representation.

### Public transport

9. I agree that, as drafted, Policy CDP1 does not adequately recognise the role of motorised public transport – i.e. bus travel – in reducing the dependency on private car journeys. I therefore propose to adopt the modification suggested by Strathclyde Partnership for Transport (SPT) and accepted by the council. It is intended that detailed design guidance will come forward in Supplementary Guidance (see Issue 54).

### Local shopping facilities

10. It would be desirable to adjust Policy CDP1 to more closely align with Policy CDP4: Network of Centres, by including 'local shopping facilities' within the facilities to be embedded in communities. I therefore propose to adopt SPT's suggested modification which achieves that objective.

### Noise Management Areas

11. 'Noise Management Areas' and 'Quiet Areas' are already defined in the glossary as follows:

*"Noise Management Areas: Areas of the City, identified under the Environmental Noise (Scotland) Regulations 2006, as being where people are most likely to be affected by environmental noise (noise from roads, railways, airports and industrial noise, but not from domestic or workplace activities).*

*Quiet Areas: Areas of the City, identified under the Environmental Noise (Scotland) Regulations 2006, where environmental noise quality is good and should be protected against an increase in noise. In Glasgow, Quiet Areas are exclusively parks."*

12. Policy CDP1 also protects areas outwith those defined zones, as one of the criteria of the policy is to ensure new activity does not introduce unacceptable additional noise particularly in, or adjacent to, Noise Management Areas nor has an adverse effect on Quiet Areas [my emphasis]. There is therefore no need to amend the policy to protect other areas of the city from excessive noise.

### Health

13. Policy CDP1 should not be considered in isolation. One of the key aims of the Proposed Plan is to make Glasgow *"a healthy, high quality place"*, and one of the City challenges is *"the need to address health levels and health inequalities across the City"*. One of the stated objectives is to *"deliver environments that support healthy lifestyles, reduce harm to health and contribute to wellbeing across the life course"*.

14. Policy CDP1 requires major developments to be assessed using the Glasgow Healthy Sustainable Neighbourhood Model and to demonstrate that healthy outcomes have been considered.

15. I am content that the Proposed Plan, in Policy CDP1 and elsewhere, attaches due significance to tackling poor health and health inequalities, insofar as is possible within the land use planning system. I am also satisfied that the application of the model referred to above will assist in meeting the council's aim, and providing it is applied reasonably, will not create an unnecessary obstacle to development. The new Supplementary Guidance should include guidance on how the model will be deployed in practice.

Traffic Management

16. I understand the concern to prevent commuters from parking in Partick, and to provide park and ride facilities serving the north and west of the City. I also appreciate the desire to discourage extraneous traffic from using Byres Road which is congested, to control emissions from taxis and to move to electric buses.

17. Detailed traffic management measures are not within the scope of the City Development Plan, which is more concerned with planning policies and development proposals. However, Policies CDP1 and CDP2 promote accessibility, active travel and public transport, rather than car journeys, and Policy CDP11: Sustainable Transport supports a number of public transport schemes, directs major developments to locations well served by existing public transport services and active travel routes, and requires new developments to be designed to promote and facilitate walking and cycling.

18. Taken together these measures should reduce car borne commuting, and the associated problems of congestion, on street parking and pollution.

Supporting representations

19. I note the representations in support of the Proposed Plan which are summarised above, but none raise any unresolved issues which I require to examine.

**Reporter's recommendations:**

Modify Policy CDP5: Resource Management, by inserting new text after paragraph 2, to read:

*"Development proposals in some parts of the City may be at risk from unstable ground, a legacy of previous mining works. The Coal Authority publishes maps of such areas and development proposals in these parts of the City may require to be accompanied by a Coal Report to help determine how development may best proceed."*

Modify Policy CDP1, bullet point 10, to read:

*"Promoting connectivity, active travel and public transport use rather than private car use".*

Modify Policy CDP1, bullet point 2, to read:

*"Embedding community facilities and local shopping facilities in communities and recognising the needs of all members of society; (refer to Policies CDP4: Network of Centres)".*

Issue 05	Air Quality	
Development plan reference:	City Profile and Context (Pages 11-15) Strategic Approach (Pages 16-25) Policy CDP1: The Placemaking Principle Policy CDP5: Resource Management	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
Hillhead Community Council (00479) Friends of the Earth Scotland (00573) Strathclyde Partnership for Transport (00633)		
Provision of the development plan to which the issue relates:	How the Plan addresses air quality, with particular reference to Policy CDP 1 - The Placemaking Principle, which seeks to ensure that new activity does not result in the deterioration of Air Quality, particularly in or adjacent to Air Quality Management Areas.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00573/1/001 Friends of the Earth Scotland - The Plan should include a policy which requires that new development does not lead to a deterioration in air quality, either directly, indirectly, or cumulatively. This is especially important as Glasgow is implicated in a legal action taken out by the European Commission against the United Kingdom for failure to reduce Nitrogen Dioxide levels to within legally binding limits. There needs to be a joined up approach between Planning Development Policies and the obligations on Glasgow City Council to improve air quality.  00573/1/004 Friends of the Earth Scotland - City Profile and Context – Social. Public Health England figures confirm that air pollution is Glasgow's biggest environmental health threat (306 deaths per year or 4.7% of all deaths in the City).  The key issues outlined in the social section of the 'City Profile and Context' chapter rightly include addressing health levels and levels of health inequality. It is worth bearing in mind that air quality has a disproportionate impact on the most vulnerable in our society: children, the elderly, those in poverty and those with pre-existing health conditions.  The Plan is directly relevant to air pollution in that the plans contained therein will have an impact on traffic flows within the City and therefore by consequence, air pollution.  Air quality has an enormous impact on the health and wellbeing of Glaswegians, the economy, and the environment, which should be reflected in the Social section of the City Profile and Context section.  00573/1/005 Friends of the Earth Scotland - City Profile and Context – Economy. Air pollution across the UK as a whole costs the NHS between £8.5 billion and £20.2 billion a year. We recommend that a cost assessment of the impact of air pollution on the economy in Glasgow is undertaken as this would show that it is an economic as well as a social and environmental priority to tackle. Tackling air pollution would contribute towards		

the achievement of growing the City's economic contribution as outlined in the Key Issues section.

Air quality has an enormous impact on the health and wellbeing of Glaswegians, the economy, and the environment, which should be reflected in the Economic section of the 'City Profile and Context' chapter.

00573/1/006 Friends of the Earth Scotland - City Profile and Context – Environment. The City Council has declared 4 Air Quality Management Areas across the City where Scottish Air Quality Standards are not being achieved and therefore putting public health at risk. European Law also exists and enforces legally binding limits on air quality for all Member States. These legal limits are not being met in Glasgow for Nitrogen Dioxide.

Air quality has an enormous impact on the health and wellbeing of Glaswegians, the economy, and the environment, which should be reflected in the Environment section of the 'City Profile and Context' chapter.

00573/1/002 Friends of the Earth Scotland - We support and agree with the key aims and four strategic outcomes outlined in the Strategic approach on pages 17 and 18. However, the Green Place Strategic Outcome should include the need to meet legally binding EU air quality limits and Scottish air quality standards - this should be reflected as one of the key objectives on Page 23.

00573/1/003 Friends of the Earth Scotland - City Profile and Context - City Challenges. At the end of this section, highlight the need to bring Glasgow's air quality to within legally binding limits required by EU law and Scottish Regulatory standards on air quality.

00479/12/001 Hillhead Community Council - Emissions from buses and taxis are a major source of pollution and should be addressed. The majority of buses and taxis in Glasgow are diesel operated. Measures should be taken to make it attractive to bus companies to change to electric or combination buses.

00479/56/002 Hillhead Community Council - Diesel taxis waiting in large numbers with engines idling poses problems for air quality and carbon emissions. Diesel buses using Byres Road can cause similar problems. The Plan should address this.

00479/12/002 Hillhead Community Council - There would appear to be a major spike in particulates around Subways. The Council should investigate this matter. Locating development near travel nodes is not sensible if it is going to expose more people to pollutants.

00479/12/003 Hillhead Community Council - Fine pollutants are dangerous but do not appear to be measured. Devices to measure the finer pollutants should be included in air quality measuring machines to give a more holistic picture of where serious steps need to be taken.

00479/12/006 Hillhead Community Council - Whilst trees are useful, they do not do a lot to control pollution by traffic. The southern beeches in the Botanic Gardens close to the Botanic/Byres Road traffic crossroad have leaves which are black with carbon and other pollutants.

00479/13/002 Hillhead Community Council - The Plan's policies in relation to air quality,

carbon reduction, public and active travel and car use are supported but these could be further improved and connected. Programmes and air quality measuring techniques undertaken by the council do not go far enough.

00479/32/003 Hillhead Community Council - Support policy CDP5 as regards use of biomass to generate electricity and its impact on Air Quality. Biomass is generally a contributor to pollution and gases. We recommend that the plan incorporates policies to discourage wood burning stoves within the city boundary as these are also pollutants of the air.

00479/56/003 Hillhead Community Council - Air quality matters should be considered by the Business Improvement District proposals for Byres Road.

00633/40/001 Strathclyde Partnership for Transport - Amend the City Challenges box (page 15) by adding a new bullet, to read: "The need to tackle congestion and improve air quality." European Environment Agency and Friends of the Earth studies show parts of Glasgow city centre as being the most polluted in the UK.

#### Supporting

00479/13/001 Hillhead Community Council - Support for the Plan's policies in relation to improving air quality, reducing emissions, and changing transport habits as:

- 1 air pollution can have long term effects on the young, the elderly and general health which in turn has implications and costs for education, health care, social services and family life
- 2 Glasgow is cited as one of the cities failing to meet EU standards
- 3 Pollution limits set by the EU have to be met by 2015

#### **Modifications sought by those submitting representations:**

00573/1/001 Friends of the Earth Scotland - Include a policy in the City Development Plan which requires that new development does not lead to a deterioration in air quality, either directly, indirectly, or cumulatively.

00573/1/004 Friends of the Earth Scotland - Amend the 'Social' section (page 12) of the 'City Profile and Context' chapter to reflect the impact of poor air quality on the health and wellbeing of Glaswegians.

00573/1/005 Friends of the Earth Scotland - Amend the 'Economy' section (page 13) of the 'City Profile and Context' chapter to reflect the impact of poor air quality on the economy of the City.

00573/1/006 Friends of the Earth Scotland - Amend the 'Environment' section (page 14) of the 'City Profile and Context' chapter to reflect the impact of poor air quality on the environment of the City.

00573/1/002 Friends of the Earth Scotland - The Green Place Strategic Outcome should include an objective of meeting legally binding EU air quality limits and Scottish air quality standards.

00573/1/003 Friends of the Earth Scotland - Amend the City Challenges section (page 15) of the 'City Profile and Context' chapter to highlight the need to bring Glasgow's air quality

to within legally binding limits required by EU law and Scottish Regulatory standards on air quality.

00479/12/001 Hillhead Community Council - Amend the Plan to address the issue of diesel emissions from buses and taxis and greater promotion of electric or combination buses.

00479/56/002 Hillhead Community Council - The Plan should address air quality and carbon emission problems associated with diesel taxis waiting in large numbers with engines idling and diesel buses using Byres Road.

00479/12/002 Hillhead Community Council - The spike in particulates around Subways should be investigated and the Plan amended if locating development near travel nodes will expose more people to pollutants.

00479/12/003 Hillhead Community Council - The Plan should promote the measurement of finer pollutants to give a more holistic picture of where steps need to be taken.

00479/12/006 Hillhead Community Council - The Plan should place less emphasis on the role that trees can play in controlling traffic pollution.

00479/13/002 Hillhead Community Council - The Plans policies in relation to air quality, carbon reduction, public and active travel and car use should be further improved and connected. The Council should do more by way of its programmes and air quality measuring techniques.

00479/32/003 Hillhead Community Council - Policy CDP5 should be reworded to state that wood burning stoves will be discouraged within the city boundary.

00479/56/003 Hillhead Community Council - Air quality matters should be considered by the Business Improvement District proposals for Byres Road.

00633/40/001 Strathclyde Partnership for Transport - Amend the City Challenges box (page 15) by adding a new bullet, to read: "The need to tackle congestion and improve air quality."

#### **Summary of responses (including reasons) by planning authority:**

##### Objecting

00573/1/001 Friends of the Earth Scotland - Scottish Planning Policy (CE2 paragraph 29) indicates that planning policies should consider the implications of development for air quality. Policy CDP1 seeks to ensure that new activity does not result in the deterioration of air quality particularly in, or adjacent to, Air Quality Management Areas. Further detail to support this policy position will be set out in Supplementary Guidance.

The Proposed Plan's strategy promotes urban regeneration and policy CDP11 directs major development to locations well served by public transport services and active travel routes and also promotes maximum parking standards to dissuade unnecessary car use. The Council will bring forward Supplementary Guidance to support policy CDP11 and provide detailed guidance on parking standards. This approach will help to minimise travel by non-sustainable means and address air quality concerns.

The Scottish Government has produced a draft Low Emission Strategy (LES), currently out for consultation (OC1). It identifies full compliance with the EU ambient air quality Directive (the Directive referred to by FoE in their objection) as an Action. The draft LES indicates that the Scottish Government will take the lead on this Action (Action 5b, page 5). This reflects that this can't be done by Local Authorities (or Development Plans) alone. The draft LES indicates, amongst other things, that local authorities will be required to take account of the objectives and policies in the Low Emission Strategy in preparing Development Plans and when undertaking Development Management (Action 14a, page 6) and that local authorities with air quality issues will revise supplementary guidance at the next scheduled update to take account of action to improve air quality whilst aligning with Low Emission Strategy objectives (Action 14c, page 6). The Supplementary Guidance which the Council will bring forward to support this aspect of policy CDP1 will provide further advice on this approach.

No modifications recommended.

00573/1/004, 00573/1/005, 00573/1/006 Friends of the Earth Scotland) - Proposed Plan policy CDP1 seeks to ensure that new activity does not result in the deterioration of air quality. Further detail to support this policy position will be set out in Supplementary Guidance. It is acknowledged that air pollution can have social environmental and economic impacts, but it is not considered necessary to make repeated reference to the impacts of air quality in each of the social, economic and environment profiles.

The Reporter could, if so minded, amend the Environment Profile, 'car' box, to make reference to the City's Air Quality Management Areas so that it reads: 'The Council has designated Air Quality Management Areas where air quality objectives are not being met'. This would help clarify the context to policy CDP1.

00479/12/001, 00479/56/002 Hillhead Community Council, 00573/1/002, 00573/1/003 Friends of the Earth Scotland - Proposed Plan policy CDP1 seeks to ensure that new activity does not result in the deterioration of air quality. However, the land use planning system has little control over other factors that determine air quality in the City, including use of wood burning stoves or the types of engine/fuel used by vehicles. As such, the policies of the Plan cannot, on their own, meet any legally binding air quality standards.

No modifications recommended.

00479/12/002 Hillhead Community Council - Scottish Planning Policy (CE2 paragraph 29) indicates that planning policies should consider the implications of development for air quality. Policy CDP1 seeks to ensure that new activity does not result in the deterioration of air quality particularly in, or adjacent to, Air Quality Management Areas. Further detail to support this policy position will be set out in Supplementary Guidance.

The Proposed Plan's strategy promotes urban regeneration and policy CDP 11 directs major development to locations well served by public transport services and active travel routes and also promotes maximum parking standards (to be set out in Supplementary Guidance) to dissuade unnecessary car use. This approach will help to minimise travel by non-sustainable means and address air quality concerns. The objector has brought forward no evidence to support the contention that there is a spike in particulates around subways.

No modifications recommended.



00479/12/003 Hillhead Community Council - How air quality is measured is governed by environmental legislation. This is not a matter that can be addressed by the Plan.

No modifications recommended.

00479/12/006 Hillhead Community Council - Whilst it is considered that trees can have a role to play in addressing air quality concerns, the Plan does not place any emphasis on the role that trees can play in controlling traffic pollution.

No modifications recommended.

00479/13/002 Hillhead Community Council - Part 2 of the Plan illustrates how its policies and proposals are intended to deliver the Plan's Key Aims. As a result, the Plan's policies in relation to air quality, carbon reduction, public and active travel are considered to be both connected and mutually supportive. Policies CDP 1 and CDP 2, as overarching policies, further aid in ensuring a connected approach, and must be considered for all development proposals in order to help achieve the aims of the Plan. They are also considered to be in accord with the National Planning Framework 3, Scottish Planning Policy and the Strategic Development Plan.

The Council will bring forward Supplementary Guidance to support these policies and provide detailed advice on their implementation and use.

How air quality is measured is governed by environmental legislation. This is not a matter that can be addressed by the Plan.

No modifications recommended.

00479/32/003 Hillhead Community Council - The context to policy CDP5 indicates that the use of biomass to generate electricity and heat may raise air quality issues in some instances. This would be in relation to larger biomass plants or boilers, intended to deliver electricity and or heat to larger developments. These issues will be considered in Supplementary Guidance to be brought forward to support the air quality statement in Policy CDP1. However, the policy/Supplementary Guidance cannot address the use of wood burning stoves as the land use planning system has little control over the installation or use of them.

No modifications recommended.

00479/56/003 Hillhead Community Council - Businesses on Byres Road recently voted to set up a Business Improvement District. This will involve contributing to a common fund which will be used to pay for a wide range of improvements aimed at enhancing trading performance and environment. The views of the traders have helped inform the projects and services that the BID will help deliver.

However, the BID is developed, managed and paid for by the private sector. The Local Development Plan has little control over its content.

No modifications recommended.

00633/40/001 Strathclyde Partnership for Transport - The Proposed Plan addresses both the issue of congestion (policy CDP 11: Sustainable Transport) and air quality (policy

CDP 1: The Placemaking Principle), reflecting their importance in Glasgow.

The Reporter could, if so minded, amend the City Challenges box on page 15 to include a new bullet point, to read: “tackling congestion and improving air quality”. This would not have the effect of amending the Plan's policies but would provide a clearer context for them.

### Supporting

00479/13/001 - Noted

No modifications recommended.

## **Reporter's conclusions:**

### Background

1. Friends of the Earth Scotland draw attention to an important challenge for the City which requires to be addressed. Air quality is a real problem in Glasgow, where parts of the city centre are identified as the most polluted in the UK. Particulates and Nitrogen Dioxide are especial concerns. There are manifest health, social, environmental and economic consequences of elevated levels of air pollution. In response the council has designated four Air Quality Management Areas, where Scottish Air Quality Standards are not being achieved.

2. The question arises whether the Proposed Plan adequately reflects that concern, and whether it makes an appropriate response in its policies and proposals.

### Need for a separate policy and supporting text on air quality?

3. In relation to the suggestion that the Proposed Plan should include a policy requiring that new development does not lead to a deterioration in air quality, I consider that Policy CDP1: The Placemaking Principle already does so. The policy indicates that council will expect new development to contribute towards making the City a better and healthier environment to live in, by ensuring, amongst other things, that new activity does not result in the deterioration of air quality particularly in, or adjacent to, Air Quality Management Areas (AQMA's).

4. The Glossary explains that AQMA's are designated parts of the City where the council considers that air quality objectives are unlikely to meet the criteria set by the Air Quality (Scotland) Regulations 2000. AQMA's then require the council to produce an air quality action plan, setting out the measures that the authority will introduce in pursuit of the air quality objectives.

5. Further guidance will be provided in supplementary guidance, which will reaffirm the importance of air quality as a relevant consideration when assessing development proposals. The council also intends to reflect the Scottish Government's draft Low Emission Strategy in its Supplementary Guidance which will aim to improve air quality. The strategy and other policies in the Proposed Plan, notably CDP11 (and the associated Supplementary Guidance), support urban regeneration, public transport and active travel, and limit car parking in order to reduce unnecessary car use and the associated air pollution.

6. I conclude that, overall, the Proposed Plan and associated Supplementary Guidance will contain sufficient policy and guidance on air quality matters, taking account of the other initiatives under way to tackle the problem. Specifically, I conclude that there is no need for a separate policy on air quality in the Proposed Plan. However, because of the acknowledged social, environmental and economic impacts, I agree that the issue should be highlighted in the City Profile and Context chapter in the manner that the council now suggests.

7. I also agree with the suggestion by Strathclyde Partnership for Transport that the need to tackle congestion and improve air quality should be recognised in the City Challenges section at page 15 of the Proposed Plan.

#### Emissions from buses, taxis, subways and wood burning stoves

8. I understand the concern about the effect of particulate emissions from diesel buses and taxis in Byres Road and elsewhere. However, this local development plan cannot determine the type of fuel used by vehicles carrying passengers in Glasgow; nor can it exercise any control over the domestic use of wood burning stoves in the City. Any proposals for biomass plants would be carefully assessed against the criteria of Policy CDP1 and the associated Supplementary Guidance, including impact on air quality. There is no evidence that there is a spike in particulate emissions around subways.

9. By themselves the policies and proposals in the Proposed Plan cannot ensure that the City meets air quality standards. The council is involved in other initiatives to that end (see above). Nonetheless, as indicated above the Proposed Plan can and does ensure that air quality issues are taken into account in the location and design of new development, and in policies which promote walking, cycling and active travel, and public transport in preference to private car use.

10. The Business Improvement District for Byres Road is an initiative by local businesses to improve trade and the local environment, and is not a matter for the local development plan.

#### Supporting representation

11. I note the representation in support of the Proposed Plan which is summarised above, but it does not raise any unresolved issues which I require to examine.

#### **Reporter's recommendations:**

Modify the 'car' box within the Environment Profile on page 14 of the Proposed Plan so that it reads:

*"The Council has designated Air Quality Management Areas where air quality objectives are not being met."*

Modify the City Challenges box on page 15 of the Proposed Plan to include a new bullet point, to read:

*"tackling congestion and improving air quality".*

Issue 06		Allotments and Growing Spaces	
Development plan reference:		City Profile and Context (Pages 11-15) Strategic Approach (Pages 16-25) Policy CDP1 The Placemaking Principle (Pages 29-31) Policy CDP2 Sustainable Spatial Strategy (Pages 32-34) Policy CDP4 Network of Centres (Pages 37-38) Policy CDP6 Green Belt and Green Network (Pages 43-45) Policy CDP7 Natural Environment (Pages 46-47) Policy and Proposals Map	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):			
Glasgow Centre for Population Health (00442) Scottish Allotments and Gardens Society (00453) Glasgow Allotment Forum (00594) Stephanie Simpson (00598)			
Provision of the development plan to which the issue relates:		How the Plan addresses allotments and growing spaces, with particular reference to Policy CDP 1 - The Placemaking Principle (which supports bringing vacant and derelict land back into short term use) and Policy CDP 6: Green Belt and Green Network (which provides protection for existing and future open spaces, including allotments).	
Planning authority's summary of the representation(s):			
The Plan's Strategic Approach			
Objecting			
00453/1/001 Scottish Allotments and Gardens Society - Seeks amendments to the Strategic Outcome of 'A Sustainable Place' (page 21). In the 'Open Space' box, add 'create growing hubs with allotments, community gardens and market gardens'. A sustainable place should include growing hubs as part of community facilities to support neighbourhood living and provide opportunities for healthy living. This requires suitable land.			
00453/3/001 Scottish Allotments and Gardens Society - Seeks amendments to the City Profile page relating to the Environment (page 14). Add a new box to this page to read 'Only one in 500 people have access to an allotment plot in Glasgow'. Amend the existing key issues box on this page by adding: 'To address health and well-being inequalities across the city need access to growing spaces.' The statistics in these boxes inform the recommendations in the rest of the Plan, and we suggest that access to allotments should be included because of its importance to quality of life.			
00453/4/001 Scottish Allotments and Gardens Society - Suggests amendment to the Strategic Outcome of 'A Vibrant Place' (page 20) - the sustainability box should also			

include 'Support growing economy with access to growing spaces, horticultural skills and culinary excellence' - a significant input to the economy can be made by exploiting the links between food and allotments with support for the growth of horticultural skills leading to social enterprise market gardens providing plants, fruit, vegetables, herbs etc.

00453/5/001 Scottish Allotments and Gardens Society - Seeks amendments to the Strategic Outcome of 'A Connected Place' (page 22). Add a box for 'Green Corridors' relating to enhancing green links across the city for nature. At present, the 'Connected Place' only considers travel and public transport. Supporting habitats such as allotments are essential for the health and wellbeing of the urban environment.

00453/6/001 Scottish Allotments and Gardens Society - Figure 5 shows the town centres and thriving network of neighbourhoods. Each should contain access to allotments and greenspace for cultivation for the food growing strategy required in the forthcoming Community Empowerment Bill and in the Sustainable Food City recommendations. Land that can be used for cultivation in Glasgow is a precious resource that should not be lost for development.

00453/8/001 Scottish Allotments and Gardens Society - The spatial strategy highlights Green belt which is very important but smaller Greenspace areas throughout the City should also be protected. A number of the housing development applications are being made for these smaller, green sites whether gap sites or associated with buildings.

### Protection of Growing Spaces

#### Objecting

00453/2/001 Scottish Allotments and Gardens Society - Objects to the lack of identification of, and protection for, green spaces, particularly for neighbourhood communal growing, in the Plan. To meet the Plan's aspirations for tackling inequalities and providing opportunities for local food production, sufficient land for cultivation needs to be identified and protected in every locality. As it stands the Plan is unbalanced. There are schedules for housing and transport development but there are none for the provision of greenspace. Once land is lost it is very difficult to decontaminate it and return it to productive use. The number of vacant and derelict brownfield sites testifies to this.

00453/12/001 Scottish Allotments and Gardens Society - Seeks amendments to Figure 14 of policy CDP6. The land for future allotments and growing areas is protected by this policy and the map should indicate they are to be protected. This map should be developed in conjunction with the Open Space Strategy, the Sustainable Food City Strategy and the proposed Allotments Strategy. Potential land for allotments as well as the existing sites should be identified and preserved.

### Identification of Land for Growing

#### Objecting

00453/7/001 Scottish Allotments and Gardens Society - Objection to the Plan's lack of land identified for cultivation as prime growing spaces. The Plan must protect land for growing in order to achieve opportunities for local food production and healthy food outlets together with social cohesion and supportive networks.

00453/10/001 Scottish Allotments and Gardens Society - The Plan states that new housing developments must include provision for new shopping facilities where any part of the development is more than 800m from existing centres. Access to greenspace and opportunity to cultivate land is of equal importance and people should be able to access such land within 800m of their dwelling. 'Growing hubs' that enable people to cultivate land, gain information and share expertise should be considered as Centres in the same way as those supplying material needs.

00453/11/002 Scottish Allotments and Gardens Society - Seeks amendments to Policy CDP6 - the policy should protect land that is suitable for cultivation until such times as an assessment of the need for such land, undertaken through the Open Space Strategy, has been undertaken and accepted.

00594/1/001 Glasgow Allotment Forum - Support for the Plan's holistic approach to development and the "opportunity for local food production and healthy food outlets" (Table 2). Concern, however, that the space required to grow food is preferred by developers as housing land. The allocation of land for food production should be included in all new developments.

### The Plan's Policies

#### Objecting

00442/2/001 Glasgow Centre for Population Health - Wishes to see a statement in support of the development of allotments and community gardens, either as community initiated projects or as part of larger housing developments. This is in light of the potential social/wellbeing benefits that these can bring, particularly for older people. Would also welcome a statement in support of developments which include opportunities to grow food locally. Therefore, seeks amendment to Policy CDP 6 to include support for the development of community gardens, allotments and spaces for growing food.

00453/9/001 Scottish Allotments and Gardens Society - Policy CDP3 should highlight the need to identify and preserve land for allotments in order to contribute to economic growth, help Glasgow become a Sustainable Food City, develop skills and reduce food imports.

00453/13/001 Scottish Allotments and Gardens Society - Policy CDP7 should be amended to include an additional aim: 'protect and increase the growing landscape across the city' and an additional paragraph: 'Growing spaces contribute to the natural environment and biodiversity of urban areas and is included in the natural landscape'. The policy should be used to ensure there is sufficient good quality land that can be used for cultivation and ecological enhancement in the City.

### Lambhill Allotments

#### Objecting

00598/1/001 Stephanie Simpson - Wishes to see the area of Lambhill Allotments zoned as Open Space and not as a possible development site. Lambhill Allotments has currently just been granted a further 3 year lease for the land, and the Community feel very strongly that an allotment site is much better for the area and the local people as it encourages people to be active, and to have a more healthy diet, and a green space for

everyone to benefit from. The area in question had been abandoned for years, a blight to the community and ignored by its owners, but through the community council working hard for nearly 2 years, we were able to transform it into a working allotment site which has flourished.

### **Modifications sought by those submitting representations:**

#### The Plan's Strategic Approach

00453/1/001 Scottish Allotments and Gardens Society - Amend the Open Space box of the Sustainable Place Strategic Outcome to include 'create growing hubs with allotments, community gardens and market gardens'.

00453/3/001 Scottish Allotments and Gardens Society - The Environment City Profile should be amended by adding a new box to 'Only one in 500 people have access to an allotment plot in Glasgow' and by amending the key issues box by adding: 'To address health and well being inequalities across the city need access to growing spaces.'

00453/4/001 Scottish Allotments and Gardens Society - Amend the Sustainability box of the Vibrant Place Strategic Outcome to include 'Support growing economy with access to growing spaces, horticultural skills and culinary excellence'.

00453/5/001 Scottish Allotments and Gardens Society - Amend the Connected Place Strategic Outcome to include a new box for 'Green Corridors' to refer to enhancing green links across the city for nature.

00453/6/001 Scottish Allotments and Gardens Society - Figure 5 should include a box for the protection and expansion of green spaces, particularly land suitable for cultivation and the links that connect every area of the city.

00453/8/001 Scottish Allotments and Gardens Society – Amend Policy CDP2 by adding "with associated growing spaces" to the end of Bullet Point 11, to read: "Support higher residential densities in sustainable locations with associated growing spaces".

Amend policy CDP2 by adding the following additional bullet points:

- "Protect and increase greenspace in the city that can be used for cultivation.
- Protect and enhance the integrity and character of the City's historic natural environment and growing spaces."

#### Protection of Growing Spaces

00453/2/001 Scottish Allotments and Gardens Society - The City Development Plan should identify, and protect, green spaces, particularly for neighbourhood communal growing.

00453/12/001 Scottish Allotments and Gardens Society - Figure 14 should be amended to show land for future allotments and growing areas.

#### Identification of Land for Growing

00453/7/001 Scottish Allotments and Gardens Society - Amend Policy CDP1 by adding a

new bullet point which reads: "Conserve any land that is suitable for cultivation as prime growing space".

00453/10/001 Scottish Allotments and Gardens Society - Add new Section 4 to Policy CDP 4 as follows:

#### '4. Growing Hubs

Development proposals within the Network of Centres will be assessed according to the following approach:

- Land suitable for growing will be protected and conserved.
- New housing developments must include provision for adequate growing spaces as identified in the survey and food strategy required under the Community Empowerment Bill.
- If sufficient land is not available, vacant and derelict land will be remediated to provide quality land for cultivation.'

Land for 'growing hubs' should also be identified in The Plan.

00453/11/002 Scottish Allotments and Gardens Society - Policy CDP6 should be reworded to protect land that is suitable for cultivation until such times as an assessment of the need for such land, undertaken through the Open Space Strategy, has been undertaken and accepted.

00594/1/001 Glasgow Allotment Forum - Amend the aims of Policy CDP1 to include the allocation of sufficient land within all new developments for food production by the community.

#### The Plan's Policies

00442/2/001 Glasgow Centre for Population Health - Policy CDP 6 should be reworded to include support for the development of community gardens, allotments and spaces for growing food.

00453/9/001 Scottish Allotments and Gardens Society - Amend Policy CDP3 by adding a new bullet point to read: 'Identify all the land that will support and improve the City's ability to become a Sustainable Food City and enable all the citizens who wish to feed themselves and acquire valuable horticultural and culinary skills that will contribute to the economic development.'

00453/13/001 Scottish Allotments and Gardens Society - Policy CDP7 should be reworded to include an additional aim: 'protect and increase the growing landscape across the city' and an additional paragraph: 'Growing spaces contribute to the natural environment and biodiversity of urban areas and are included in the natural landscape'.

#### Lambhill Allotments

00598/1/001 Stephanie Simpson - The City Development Plan should designate the area of Lambhill Allotments as Open Space.



**Summary of responses (including reasons) by planning authority:**

The Plan's Strategic Approach

Objecting

00453/1/001, 00453/4/001, 00453/5/001 Scottish Allotments and Gardens Society - The objector seeks similar modifications in relation to multiple sections of the Plan. The Sustainable Place and Green Place Strategic Outcomes already identify increased access to open space and the green network as being objectives of the Plan. Allotments and growing spaces are one of the functions which the green network is intended to deliver. However, to single out growing spaces in this part of the Plan as being a particularly important function of the green network, and not other functions, is not considered helpful. Specific reference to allotments and growing spaces as being appropriate functions of the Green Network would be more appropriately made in the Plan's policy section (see response to objection 00442/2/001).

No modifications recommended.

00453/3/001 Scottish Allotments and Gardens Society - The Council is starting work to refresh its Allotments/Food Growing Strategy and this will include a review of the demand for allotments, in terms of quantity, quality and geography. This will, in turn, help inform the approach to be taken to the provision of allotments/growing spaces in the City through the Open Space Strategy.

It is considered that there could be value in making reference to ensuring access to good quality open spaces in the Environment Key Issues box. However, to single out growing spaces as being particularly important compared to other open spaces is not considered helpful.

The Reporter could, if so minded, amend the text in the Environment Key Issues box to include "delivering access to better quality open spaces" as a new issue. This would include allotments and growing spaces, as well as amenity space, natural spaces etc. This would help clarify the Plan's context, reflecting the importance of this issue.

00453/6/001 Scottish Allotments and Gardens Society - The purpose of Figure 5 is to define the City's key spatial components and indicate The Plan's high level development ambitions for each of them. The strategic nature of this diagram means that detailed reference to the protection and expansion of green spaces is considered inappropriate, particularly as this is referred to elsewhere in The Plan.

No modifications recommended.

00453/8/001 Scottish Allotments and Gardens Society - Smaller open spaces are identified on the Council's Open Space Map (PAN 65 Map – <https://www.glasgow.gov.uk/index.aspx?articleid=5857>).

Policy CDP6 states that the Council will support the retention of a number of the open space categories shown on the Open Space Map. These are listed on Figure 14, and include allotments. There are too many of these small open spaces for them to be shown accurately in The Plan itself.

The Council is starting work to refresh its Allotments/Food Growing Strategy and this will include a review of the demand for allotments/growing spaces, in terms of quantity, quality and geography. Land needed to help meet this demand will be identified in the Allotments Strategy and ultimately on the Open Space Map and will benefit from protection under Policy CDP6.

Policy CDP2 indicates that the new development should protect and enhance the integrity and character of the City's historic and natural environment and provide for the development and expansion of the multi-functional green/blue network.

The Reporter could, if so minded, amend policy CDP2 to make specific reference to protecting open space (as addressed by CDP6), by amending bullet point 15 to read: "protect open space and provide for the development and expansion of the multi-functional green/blue network". This would help clarify the importance of protecting open space to the Plan's strategy, and would introduce consistency with CDP6.

### Protection of Growing Spaces

#### Objecting

00453/2/001, 00453/12/001 Scottish Allotments and Gardens Society - The Plan protects open spaces, including allotments. Smaller open spaces are identified on the Council's Open Space Map (PAN 65 Map). Policy CDP6 states that the Council will support the retention of a number of the open space categories shown on the Open Space Map. These categories are listed on Figure 14, and include Allotments. There are too many of these small open spaces for them to be shown accurately in the Plan itself.

The Council is starting work to refresh its Allotments/Food Growing Strategy and this will include a review of the demand for allotments/growing spaces, in terms of quantity, quality and geography. This will, in turn, help inform the approach to be taken to the provision of allotments/growing spaces in the City through the Open Space Strategy. Land needed to help meet this demand will be identified in the Allotments Strategy and ultimately on the Open Space Map. Policy CDP6 indicates that the Council will support the retention of the categories of open space specified and shown on Figure 14, and identified on the Council's Open Space Map. This includes allotments.

Development in those parts of the City where there is an identified unmet demand for allotments/growing spaces will be expected to provide a contribution to help meet that deficiency.

No modifications recommended.

### Identification of Land for Growing

#### Objecting

00453/7/001, 00453/11/002 Scottish Allotments and Gardens Society - The Council is starting work to refresh its Allotments/Food Growing Strategy and this will include a review of the demand for allotments/ growing spaces, in terms of quantity, quality and geography. This will, in turn, help inform the approach to be taken to the provision of allotments/growing spaces in the City through the Open Space Strategy. Land needed to help meet this demand will be identified on the Open Space Map. Policy CDP6 indicates

that the Council will support the retention of the categories of open space specified and shown on Figure 14, and identified on the Council's Open Space Map. This includes allotments.

There are a number of demands on land in the City, including for housing, jobs and community uses. The Plan has identified a housing land supply (predominantly brownfield), intended to address the Scottish Government's requirement to provide a generous effective land supply (*CE2*, paragraph 110). It is not considered possible, or desirable, to safeguard *any* land suitable for cultivation pending the outcome of the demand assessment being undertaken through the new Strategy. Use of the effective brownfield housing land supply for other uses, such as growing, would increase the pressure for additional greenfield release.

Nevertheless, it is considered that making more specific reference to the promotion of community growing would better help address SPP (*CE2*) paragraph 227, which indicates that Plans should encourage opportunities for a range of community growing spaces.

The Reporter could, if so minded, amend policy CDP 1 to refer to the need to promote community growing by amending bullet point 3 of the second set of bullet points, to read: "creating healthy and more equitable environments and promoting healthy lifestyle opportunities, including opportunities for communities to grow food." This would bring clarity to the policy and align it more closely with Scottish Planning Policy.

00453/10/001 Scottish Allotments and Gardens Society – The Council is starting work to refresh its Allotments/Food Growing Strategy and this will include a review of the demand for allotments/growing spaces, in terms of quantity, quality and geography. This will, in turn, help inform the approach to be taken to the provision of allotments/growing spaces in the City through the Open Space Strategy. Land needed to help meet this demand will be identified in the Allotments Strategy and ultimately on the Open Space Map. Policy CDP6 indicates that the Council will support the retention of the categories of open space specified and shown on Figure 14, and identified on the Council's Open Space Map. This includes allotments.

Developments in those parts of the City where there is an identified unmet demand for allotments/growing spaces will be expected to provide a contribution to help meet that deficiency.

No modifications recommended, but see response to objections 00453/7/001 and 00453/11/002 regarding proposed changes to policy CDP1 to promote community growing.

00594/1/001 Glasgow Allotment Forum - Policy CDP 6 indicates that standards for the provision of open space in new development will be brought forward through the Council's Open Space Strategy. It is anticipated that standards will be published for consultation by the end of 2015.

Planning Advice Note 65 (*CE4 para 29*) indicates that the Council should take a demand led approach to the provision of allotments and growing spaces. The Council is starting work to refresh its Allotments/Food Growing Strategy and this will include a review of the demand for allotments, both in terms of quantity, quality and geography.

Development in those parts of the City where there is an identified unmet demand for

allotments/growing spaces will be expected to provide a contribution to help meet that deficiency.

No modifications recommended

### The Plan's Policies

#### Objecting

00442/2/001 Glasgow Centre for Population Health - Policy CDP6 supports the retention of open spaces and development that delivers an enhanced/extended Green Network. Allotments and growing spaces are considered to be an element of the Green Network – the policy, in conjunction with Figure 14, specifically references allotments as a core element in the Green Network. It is considered that support for the development of community growing is expressed best in policy CDP1 (see response to objections 00453/7/001 and 00453/11/002).

The Reporter could, if so minded, amend policy CDP 6 to make specific reference to growing spaces as being one of the functions which the green network can provide. This could be done by including “growing spaces” in the list of functions set out in: the first sentence of the fifth paragraph of the policy; or the first paragraph of the policy context; or both. This would help clarify the intent of the policy.

00453/9/001 Scottish Allotments and Gardens Society - A variation on this objection has been submitted in relation to many policies in the Plan. In the interests of ensuring a concise and succinct Plan it is considered that the modification would not be appropriate in relation to this policy and that the matter could be more appropriately addressed in policy CDP1 (see response to objections 00453/7/001 and 00453/11/002).

No modifications recommended.

00453/13/001 Scottish Allotments and Gardens Society - Policy CDP7 aims to afford protection to landscape, nature conservation and geodiversity assets which are of particular importance in the City, including sites, habitats, species or ecosystems which are protected by law. Whilst it is recognised that allotments and growing spaces can provide benefits for biodiversity as part of the green network, there would appear to be no justification for identifying them for protection based solely on their nature conservation or landscape value.

Policy CDP6 indicates that the Council will support the retention of the categories of open space specified and shown on Figure 14, and identified on the Council's Open Space Map. This includes allotments. The protection and promotion of allotments and growing spaces is best addressed through policies CDP1 and CDP6 (see also response to objections 00453/7/001 and 00453/11/002).

No modifications recommended.

### Lambhill Allotments

#### Objecting

00598/1/001 Stephanie Simpson - This site, and the wider area, was the subject of an

objection to City Plan 2 and was considered at the City Plan 2 Local Plan Inquiry (OC53). The objector sought re-designation of the site to Residential Use. The Reporter agreed with the Council in concluding that much of the wider site was underused and that partial redevelopment, linked to upgrading of the remaining area of open space, could enable this land to be brought back into functional use. She indicated that there was scope for the relative balance between housing, open space and allotment provision to be considered in detail through the planning application process, but amended City Plan 2 to identify an area of land, roughly approximating to the area of the current Lambhill allotment site, as open space on City Plan 2's Development Policy Principles Map North (OC83).

The Proposed City Development Plan does not identify open space in the way that City Plan 2 does. Instead, policy CDP6 supports the retention of the categories of open space specified and shown on the accompanying Figure 14. Figure 14 indicates that certain of the open space categories shown on the Council's Open Space Map are protected by the policy, including allotments and other functional greenspace. The Open Space Map identifies the allotments site as part of a larger site categorised as 'other functional greenspace – allotments' (OC54). As such, the site would be protected by policy CDP6, with its current role as a functioning allotment giving its protection further weight should any planning application come forward for the wider site.

No modifications recommended.

### **Reporter's conclusions:**

#### The Plan's Strategic Approach

1. There is no argument that 'growing hubs' – allotments, community gardens and market gardens – have a key role to play in providing valuable physical exercise and access to good nutritious food. 73% of dwellings in Glasgow are flats, so only around a quarter of the City's residents have access to a garden. This means that allotments are an important part of the requirement for greenspace in Glasgow. It is clear that there is an active demand for allotments in the City, notably in the West End.
2. Scottish Planning Policy (paragraph 227) states that local development plans should safeguard existing and potential allotment sites to ensure that local authorities meet their statutory duty to provide allotments where there is a proven demand. The same paragraph indicates that plans should also encourage opportunities for a range of community growing spaces.
3. Policy CDP6: Green Belt and Green Network pledges that the council will support the retention, as open space, of the categories of open space specified and shown on Figure 14 (and identified on the council's Open Space Map). One of the listed categories is allotments, which are shown on the Open Space Map. The council's Open Space Strategy is intended to form the basis of forthcoming Supplementary Guidance aimed at enhancing and extending the Green Network.
4. The outcome of the council's current review of the demand for allotments in the City will determine the council's detailed response to the requirement for allotments and growing spaces in Glasgow.

5. A number of representations suggest that the Proposed Plan should attach greater priority to the protection and development of community growing spaces. I accept that it would be worthwhile to highlight the need to ensure access to good quality open spaces within the key issues (Environment) box on page 14 of the Proposed Plan. I also agree that policy CDP2 should be amended to underline that open space (which includes allotments) will be protected.

6. However I agree with the council that it is unnecessary to highlight allotments and growing spaces within the four Strategic Outcomes of the Proposed Plan, which are intended as high level aims rather than specific objectives. It is better to make explicit reference to them within the relevant policy, as the council suggests.

7. Likewise I see no need to include a reference to greenspace in Figure 5, which is intended to illustrate high level policy directing development through the sustainable spatial strategy.

#### Protection of Growing Spaces and Identification of Land for Growing

8. There is agreement that open spaces, including allotments, should be protected from development. Indeed, policy CDP6 supports the retention as open space of the categories of open space listed in Figure 14, which include allotments, shown on the Open Space Map.

9. The council's Open Space Map, which is updated over time, shows all open spaces within the City that are subject to the protection of policy CDP6. The Open Space Map will also identify additional land to meet the demand for allotments/ growing spaces in Glasgow, arising from the allotments strategy. Where there is a proven demand, developers will be expected to contribute to meeting the shortfall.

10. On that basis I do not consider that there is a need for a map in the Proposed Plan showing existing and proposed allotments/growing spaces.

11. However I agree that policy CDP1 should make a more explicit statement about the need to encourage communities to grow their own food, and I adopt the council's suggested wording which would achieve that purpose.

#### The Plan's Policies

12. For the reasons discussed above I accept that there is a need to amend policy CDP6 to recognise the importance of growing spaces as one of the key components of the green network.

13. However policy CDP3, which is concerned with economic development, does not require to be modified to refer to the economic benefits of growing food. It is unnecessary to single out horticultural and culinary skills amongst the various skills which contribute to economic development.

14. Similarly, policy CDP7 aims to safeguard natural environments and biodiversity, and is not the appropriate policy to promote and protect allotments and growing spaces – that is done effectively in policies CDP1 and CDP6 (as modified below).

Lambhill Allotments

15. These allotments are shown as such on the council's Open Space Map, and are therefore protected as part of the designated green network by policy CDP6. I therefore see no need to identify them separately within the Proposed Plan.

**Reporter's recommendations:**

Modify the text in the Environment Key Issues box in page 14 to include "*delivering access to better quality open spaces*" as a new issue.

Modify policy CDP1 by amending bullet point 3 of the second set of bullet points, to read:

*"creating healthy and more equitable environments and promoting healthy lifestyle opportunities, including opportunities for communities to grow food."*

Modify policy CDP2 by amending bullet point 15 to read:

*"protect open space and provide for the development and expansion of the multi-functional green/blue network".*

Modify policy CDP 6 by including "*growing spaces*" in the list of functions set out in the first sentence of the fifth paragraph of the policy, and the first paragraph of the policy context.

Issue 07	Sustainable Spatial Strategy	
Development plan reference:	Policy CDP 2 Sustainable Spatial Strategy (Pages 32-34)	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
Southside Housing Association (00424) Sportscotland (00429) Hillhead Community Council (00479) Persimmon Homes (00497) Forestry Commission Scotland (00535) St Modwen (00541) Pollokshields Community Council (00609) Strathclyde Partnership for Transport (00633) George Capital LLP (00636) Dowanhill Hyndland and Kelvinside Community Council (00637)		
Provision of the development plan to which the issue relates:	Policy CDP 2 - The Sustainable Spatial Strategy is one of two overarching policies in the Plan which all development proposals must consider in order to achieve the Plan's Key Aims. This Policy provides a spatial representation of the Plan's Strategy and seeks to influence the location and form of development and create a compact city which supports sustainable development.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00424/1/001 Southside Housing Association - The Plan should make provision for an East Pollokshields and Port Eglinton planning study to be undertaken.  00429/11/001 Sportscotland - In relation to sports uses, and uses like schools, which contain sports facilities, we are concerned that requiring these to be located in town centres could compromise their extent, e.g. a school with associated pitches takes up a reasonable area of land, a school with no outside sports space won't, and we suggest that schools need these outdoor sports areas. The published SPP reflects this issue.  00479/30/001 Hillhead Community Council - Concerns regarding the clarity of diagrams, particularly Figure 9, due to size, style and ease of legibility. The content of some diagrams require further explanation. This policy could be expanded to limit the need for supplementary guidance.  00479/30/003 Hillhead Community Council - Concerns regarding residential density, particularly aspects such as height, size and design which should be carefully considered along with any potential impacts on subway routes, conservation areas and transport nodes. Overdevelopment should be avoided, particularly where development may encroach onto residential lanes or community spaces within Conservation Areas.  00497/9/001 Persimmon Homes - Areas of long-term growth should be highlighted as part of the Spatial Strategy in line with Scottish Government Policy.		



00497/13/001 Persimmon Homes - In line with the revised Scottish Planning Policy, policy CDP2 should refer to a presumption in favour of sustainable development. The Council are prioritising environmental impacts over economic and social impacts and are prepared to sacrifice the delivery of housing, a key economic driver of the Scottish Government, in favour of the retention of greenbelt which regardless of designation is open to challenge due to its lack of defensibility. No weight was given to the economic and social impacts in the Green Belt Review.

00535/1/001 Forestry Commission Scotland - We wish to see an additional bullet point added that makes a more explicit reference to trees and the urban woodland environment.

00609/4/002 Pollokshields Community Council - Express concern in relation to the ad hoc nature in which recent development proposals have come forward in the area. The M74 extension/new housing developments warrant a planning study for East Pollokshields/Port Eglinton as outlined in City Plan 2 Development Strategies and Priorities.

00633/11/001 Strathclyde Partnership for Transport - This policy should also refer to the City Centre Strategy and City Centre Transport Strategy given the significant implications these will have for placemaking.

00633/36/001 Strathclyde Partnership for Transport - Bullet Points 9 and 11 make reference to sustainable locations. Transport accessibility is a vital component of a sustainable location. As noted in relation to page 20 (A Vibrant Place), the Plan should define what it considers sustainable locations to be or signpost to relevant sources.

00633/37/001 Strathclyde Partnership for Transport - We welcome the principle of higher residential densities in sustainable locations, but would suggest additional text in Bullet Point 11 to include transport hubs.

00637/5/001 Dowanhill Hyndland and Kelvinside Community Council - Add consideration of City Skyscape/Roofscape in the City Centre. As we move towards creating more tall buildings in the City Centre, the inevitable effects on the City Skyscape/Roofscape now need to be monitored. We have interesting high viewpoints e.g. The Lighthouse etc. So we also need to inform the decisions to take into account the character of the city centre Roofscape/Skyscape as it evolves from Victorian scale buildings into 21st century architecture.

### Supporting

00541/1/001 St Modwen - Supports the spatial strategy and the continued focus on regeneration and redevelopment of the existing urban area. Also welcomes that the Council will support development proposals that utilise brownfield sites in preference to greenfield sites. Development of the rail maintenance depot at Charles Street, Springburn is considered to accord with this approach.

00636/8/001 George Capital LLP - Support for the CDP 2 principles, that where possible, and economically viable, brownfield sites should be preferred to previously undeveloped land and that economic development should be focused in Strategic Economic Investment Locations, of which the City Centre is one.

**Modifications sought by those submitting representations:**

00424/1/001 Southside Housing Association - The Plan should make provision for an East Pollokshields and Port Eglinton planning study to be undertaken.

00429/11/001 Sportscotland - Amend policy CDP2 text to recognise that uses such as playing pitches and schools have space requirements that may not be able to be met in centres without compromising their function. As an alternative, use the wording from the published SPP (para 68) which reflects this

00479/30/001 Hillhead Community Council - Figure 9 needs to be made bigger and clearer and explanation for some of the terms used on it should be provided.

00479/30/003 Hillhead Community Council - The promotion of higher residential densities in sustainable locations should be tempered by reference to the need to have regard to aspects such as height, size, design, potential impacts on public transport, conservation areas and residential amenity.

00497/9/001 Persimmon Homes - Highlight areas of long-term growth as part of the Spatial Strategy.

00497/13/001 Persimmon Homes - Policy CDP2 should make reference to a presumption in favour of sustainable development.

00535/1/001 Forestry Commission Scotland - Add additional Bullet Point to Policy CDP2:

- Protect and enhance the function, character and integrity of the City's trees and urban woodlands, within its green network

00609/4/002 Pollokshields Community Council - Seek a planning study for East Pollokshields/Port Eglinton

00633/11/001 Strathclyde Partnership for Transport - Add reference to the City Centre Strategy and City Centre Transport Strategy.

00633/36/001 Strathclyde Partnership for Transport - The Plan should define 'sustainable locations'.

00633/37/001 Strathclyde Partnership for Transport - Add "... Including around transport hubs" after sustainable locations in Bullet Point 11 to read "Support higher residential densities in sustainable locations, including around transport hubs." This reflects policy CDP 11.

00637/5/001 Dowanhill Hyndland and Kelvinside Community Council - Consideration of City Skyscape/Roofscape in the City Centre should be included in CDP2.

**Summary of responses (including reasons) by planning authority:**Objecting

00424/1/001 Southside Housing Association, 00609/4/002 Pollokshields Community Council - The scoping and survey work required as the first stage of preparing the South

Central Local Development Framework (LDF) will determine an appropriate boundary for the LDF area. Timescales are not yet known for work to commence, but when they are, the Council will fully engage with all stakeholders and interested parties to take the process forward.

No modifications recommended.

00429/11/001 Sportscotland - The Proposed Plan was prepared prior to the publication of the revised Scottish Planning Policy (June 2014) (CE2). It would, therefore, be beneficial to update Bullet Point 5 of Policy CDP2 of the Plan to better reflect the up-to-date policy position, as outlined in paragraph 68 of Scottish Planning Policy (June 2014) (CE2).

The Reporter could, if so minded, amend Bullet Point 5 of Policy CDP2 by replacing "...For retail, leisure and business development and for community facilities;" with "...For uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities;".

00479/30/001 Hillhead Community Council - There are a number of 'Directing Development' diagrams in the Plan. These diagrams were intended to broadly indicate the key spatial implications for a particular policy area, at a City-wide level, and relate this to the Plan's Spatial Strategy. The diagrams are for illustrative purposes only. It is agreed that the existing diagrams in CDP5, CDP6, CDP8 and CDP9 require further refinement and amendment.

The Reporter could, if so minded, agree to the amendment of the suite of Directing Development diagrams within CDP5, CDP6, CDP8 and CDP9 to better illustrate the key spatial implications for that particular policy area. This will involve the addition of a key and/or a short descriptive narrative which explains each diagram and either the removal or fading out of the (Spatial Strategy) background layer. In addition, consideration will be given to extending the suite of diagrams to include similar diagrams for Policies CDP3, CDP4, CDP7 and CDP11. Diagrams of this nature are not required for Policies CDP1 or CDP12. Figure 9 (CDP2) is not considered to require amendment as it already fulfils its purpose of providing an indicative illustration of the spatial strategy and scope of Policy CDP2.

Such changes should bring greater clarity and help the reader to better understand the individual spatial implications of each of the policies in the Plan.

00479/30/003 Hillhead Community Council - Policy CDP 1 (The Placemaking Principle) requires development proposals to satisfy a list of criteria that contribute towards making the City a better and healthier environment to live in and aspire towards the highest standards of design while protecting the City's heritage. Policies CDP 1 and CDP 2 apply to all development proposals. These policies, together with associated Supplementary Guidance, are considered to provide sufficient protection from overdevelopment.

No modifications recommended.

00497/9/001 Persimmon Homes - The Plan has identified longer-term development sites at the three Proposed Community Growth Areas including Robroyston, Baillieston/Broomhouse/Carmyle and Gartloch/Easterhouse. These are identified spatially as proposed masterplan areas on the Policy and Proposals Map. A Feasibility Study

Area has also been identified at Summerston to assess the potential for additional housing growth in the long-term.

No modifications recommended.

00497/13/001 Persimmon Homes - It is not considered necessary for the Plan to refer to the presumption in favour of sustainable development, as this is set out explicitly in national policy, including a detailed explanation of what this means for policies and decisions.

Paragraphs 28 and 29 of Scottish Planning Policy (CE2) include this explanation. Paragraph 28 states that 'the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost.' Paragraph 29 of SPP indicates that a presumption in favour of development that contributes to sustainable development means, amongst other things, giving due weight to net economic benefit, but also:

- protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment; and
- making efficient use of existing capacities of land, buildings and infrastructure including supporting regeneration priorities.

The Green Belt review was undertaken to accord with Strategy Support Measure 8 (SSM8) of the Glasgow and the Clyde Valley Joint Structure Plan 2012 (CE6). SSM8 highlights that the Green Belt has a significant role to play in achieving key environmental objectives, and that the review and designation of the inner and outer boundaries of the Green Belt should be priorities for Local Development Plans so as to ensure that these environmental objectives are achieved.

The Green Belt Review (Background Paper 13) (OC46) examined the Green Belt within this context and with a view to identifying where land could be removed for development, helping deliver a long term sustainable spatial strategy. Glasgow has a small and tightly constrained Green Belt and the vast majority of green belt release opportunities which do not impact on these environmental objectives have already been made through City Plans 1 and 2. The relatively limited release of Green Belt land identified in the Green Belt Review (at 3 relatively small locations with the prospect of additional release, potentially on a larger scale, at a fourth (Summerston) reflects this, and the important environmental function of the remaining Green Belt.

The objector appears to suggest that the Council should release green belt land to deliver land for housing irrespective of the value of that green belt land in meeting environmental objectives. As detailed elsewhere, the Plan's approach (a predominantly brownfield housing land supply with limited green belt release) is intended to address the Scottish Government's requirement to provide a generous effective land supply. Although the total land supply falls short of the requirements set out in the Strategic Development Plan, it is considered to be an appropriate response, given the more difficult housing market conditions which have prevailed since 2008 and which are continuing. The land supply is considered to provide sufficient flexibility to respond to any future increase in housing demand, whilst protecting the City's green belt and open space.

It is considered that the approach taken in the Plan, and Green Belt Review, accords with the detailed explanation of what the presumption in favour of sustainable development means for policies and proposals, as set out in paragraphs 28 and 29 of SPP (CE2).

No modifications recommended.

00535/1/001 Forestry Commission Scotland - The Council cannot protect trees and urban woodlands unless they are covered by a Tree Preservation Order or lie within a Conservation Area or site with a specific landscape/nature conservation designation. Policy CDP2 is one of two overarching policies that highlights broad spatial principles that must be considered for all development proposals. It is supported by the remaining ten policies that provide more detail on specific land use elements. Bullet Point 12 of Policy CDP2 refers to 'integrated green infrastructure' in broad terms, which includes trees and woodland. This is supported more specifically by Policy CDP7 (Natural Environment) which seeks to ensure that new development does not have an unacceptable effect on trees, woodland and hedgerows of importance. These policies are considered to be adequate.

No modifications recommended.

00633/11/001 Strathclyde Partnership for Transport - It is not considered necessary to make specific reference to the City Centre Strategy and City Centre Transport Strategy as the relevant spatial planning elements of these documents will be included in the City Centre Strategic Development Framework, which is already referenced in Bullet Point 2 of Policy CDP 2.

00633/36/001, 00633/37/001 Strathclyde Partnership for Transport - The suggested modification is in line with the broad aims and objectives of the Plan, however, it is not considered necessary to add specific reference to transport hubs in the Policy itself.

The Reporter could, if so minded, add the following definition to the Glossary:

'Sustainable Locations

Areas of the City where higher density development will be encouraged in order to make most efficient use of the City's infrastructure and services.'

00637/5/001 Dowanhill Hyndland and Kelvinside Community Council - Consideration of general placemaking issues, such as skyscape and roofscape, will be addressed in the Placemaking Supplementary Guidance associated with Policy CDP1: The Placemaking Principle. Furthermore, Spatial Supplementary Guidance will be prepared specifically for the City Centre. Refer to Issue No.54 for further details. This suite of documents will ensure that placemaking issues specific to the City Centre will be considered when assessing future development proposals.

No modifications recommended.

## **Reporter's conclusions:**

### General

1. The supporting text at page 32 of the Proposed Plan explains that Policy CDP2 provides a spatial representation of the Plan's strategy, with a strong emphasis on

placemaking, health and wellbeing, and sustainability. It also advises that the policy should be read in conjunction with Policy CDP1: The Placemaking Principle. The stated aim of the policy is to influence the location and form of development to create a 'compact city' form which supports sustainable development. Two further levels of spatial guidance are proposed: Strategic Development Frameworks and Local Development Frameworks.

#### South Central Local Development Framework

2. Local Development Frameworks (LDFs) are to be prepared to guide development at a neighbourhood level. South Central Glasgow has been identified as an area where there is a need to refresh efforts to support regeneration which has been hampered by the economic downturn. It is not a matter for the Proposed Plan to define the boundaries of the South Central LDF. However, the council will require to take account of the views of Southside Housing Association, Pollokshields Community Council and other local organisations in scoping and preparing the LDF.

#### Town centres as preferred locations for leisure and community facilities

3. I can understand Sportscotland's concern about the wording of the fifth bullet point of Policy CDP2, which appears not to acknowledge the particular locational needs of sports facilities requiring extensive sites. I agree with the council that this issue can be readily resolved by amending the policy in line with paragraph 68 of SPP (June 2014).

#### 'Directing Development' diagrams

4. I share Hillhead Community Council's concern about the clarity of certain of the diagrams in the Proposed Plan, especially those supporting policies CDP5, CDP6, CDP8 and CDP9. I accept that the 'Directing Development' diagrams are intended for illustrative purposes, but many are difficult to interpret, and some of the terms used are rather opaque.

5. I agree with the council that the above diagrams require refinement and explanation, including the addition of a key or a descriptive narrative or both. However, Figure 9, which already has a key and is easy to interpret, does not require to be modified.

#### Residential densities

6. Policy CDP2 supports higher residential densities in sustainable locations. This approach is consistent with national and strategic planning policy. I understand Hillhead Community Council's anxiety to avoid overdevelopment and to respect the special qualities of conservation areas, residential lanes and community spaces, but elsewhere in the policy the council recognises the need to protect and enhance the integrity and character of the City's historic and natural environment.

7. Also, policy CDP1 expects new development to be design led, and to meet a number of requirements, including respecting the historic and natural environment by responding to its qualities and character. Taken together with the associated Supplementary Guidance, which will provide details of how development proposals will be assessed in terms of meeting the Placemaking Principle, I am content that there will be adequate policy and guidance to prevent overdevelopment in the City.

Areas of long-term growth

8. In relation to the objection from Persimmon Homes, the council points out that three areas are identified as Proposed Community Growth Area Masterplan Proposals (H115 to H117) on the Proposals Map. In addition, an extensive area is identified at Summerston (see Issue 17) as a Feasibility Study Area, to assess the potential for additional land supply within a smaller area.

9. I conclude that the Proposed Plan does indeed highlight areas of long-term growth, as required in Government policy.

Sustainable development

10. Scottish Planning Policy (SPP), issued in June 2014, introduced a presumption in favour of development that contributes to sustainable development. Paragraph 29 of SPP indicates that this means that policies and decisions should be guided by a number of principles. I am satisfied that these principles are embodied in the relevant policies of the Proposed Plan, including CDP2. I see no need for an explicit reference to the presumption within the Proposed Plan, providing its policies and proposals are generally consistent with the relevant principles of SPP. There is no inherent contradiction between the council's focus on the regeneration and redevelopment of the existing urban area, and the presumption in favour of development that contributes to sustainable development.

11. Persimmon Homes take issue with the council's weighting of environmental impacts against economic and social impacts. In particular, they criticise the emphasis which they consider the council has placed on protecting the green belt rather than the delivery of housing. We consider objections relating to the Green Belt and Meeting Housing Needs elsewhere in this report under Issues 13 and 17 respectively. We are satisfied that the modifications which we recommend in Issue 17 (including the revision to Policy CDP10 to address the circumstances where there is a failure to maintain a five-year supply of effective housing land) are the appropriate response to the identified shortfall in housing sites.

Trees and urban woodlands

12. I do not consider that the concern raised by Forestry Commission Scotland (FCS) is met by the requirement in policy CDP2 to "contribute towards the development of an integrated green infrastructure". FCS wish to see an explicit reference to the need to protect and enhance trees and urban woodlands. However, I am satisfied that FCS's interest is addressed elsewhere in the Proposed Plan. Policy CDP7 (see Issue 14) provides that new development should not have an unacceptable effect on trees, woodlands or hedgerows that are of importance, and requires new development to enhance them wherever possible.

City Centre Strategy and City Centre Transport Strategy

13. I see no need to reference these strategies in the Proposed Plan, since they will be included in the strategic development framework for the city centre. Local development plans are intended to be concise documents, and it is not necessary or appropriate to refer to all the relevant source material within the Proposed Plan.

Sustainable locations, and transport hubs

14. Given the Proposed Plan's emphasis on developing in 'sustainable locations' I agree that the term should be defined in the Glossary as now suggested by the council. However, there is no need to include specific reference to 'transport hubs' in Policy CDP2, as they would clearly fall within the wider definition of 'sustainable locations' now proposed.

Skyscape/roofscape

15. Dowanhill Hyndland and Kelvinside Community Council raise a legitimate matter of concern about the effect of tall new buildings on the roofscape of the City, including the impact on its important Victorian heritage. However, this is to be addressed under Policy CDP1: The Placemaking Principle, which expects new development to respect the historic environment by responding to its qualities and character. The policy will be supported by Supplementary Guidance which will provide details on how development proposals will be assessed in terms of meeting the Placemaking Principle.

Supporting representations

16. I note the representations in support of the Plan which are summarised above, but they do not raise any unresolved issues which I require to examine.

**Reporter's recommendations:**

Modify Policy CDP2 by amending bullet point 5 of Policy CDP2 to replace "...for retail, leisure and business development and for community facilities;" with *"...for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities;"*.

Modify the suite of Directing Development diagrams within Policies CDP5, CDP6, CDP8 and CDP9 by the addition of a key and/or a short descriptive narrative which explains each diagram and either the removal or fading out of the (Spatial Strategy) background layer.

Modify the Glossary, by adding the following definition:

*"Sustainable Locations*

*Areas of the City where higher density development will be encouraged in order to make most efficient use of the City's infrastructure and services."*



Issue 08	The Re-use of Vacant and Derelict Land	
Development plan reference:	General	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
Muriel Pearson (00143) Bill Carson (00144) Glasgow Centre for Population Health (00442) Scottish Enterprise (00533) Cranhill Development Trust (00614)		
Provision of the development plan to which the issue relates:	This is one of the biggest challenges the City faces, if it is to fulfil its economic potential. There is a large amount of vacant and derelict land across the City and significant remediation and infrastructural costs involved in bringing this land back into productive use.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00143/11/001 Muriel Pearson - All appropriate land identified by the Scottish Vacant and Derelict Land Survey 2012 should be developed so that there is no unproductive land in the area. This is of particular significance in the Cranhill area where there are large amounts of vacant and derelict land yet only three sites are designated for development. Potential for development should be supported.  00442/1/002 Glasgow Centre for Population Health - We would like the Plan to provide a statement in support of development which takes place in areas containing persistently high levels of vacant land. This, we feel, is an issue of environmental justice, as areas of deprivation are more likely to contain vacant land than affluent areas.  00614/2/001 Cranhill Development Trust - A significant percentage of the land in Cranhill is unused at present. Only a limited amount of the derelict land in Cranhill is designated for development in the Plan. Why is Cranhill not being considered for significant development? All unused land should be developed for a mixture of social and private housing.  <u>Supporting</u>  00144/3/001 Bill Carson - Supports bringing vacant and derelict land back into effective use via both short term and long term solutions. Mapped information on vacant ground and ownership information would help local communities.  00533/3/002 Scottish Enterprise - Supports the prioritisation of the remediation and reuse of vacant and derelict land and the utilisation of brownfield land.		

**Modifications sought by those submitting representations:**

00143/11/001 Muriel Pearson - All appropriate land identified by the Scottish Vacant and Derelict Land Survey 2012 should be developed so that there is no unproductive land in the area.

00442/1/002 Glasgow Centre for Population Health - The Plan should contain a statement in support of development which takes place in areas containing persistently high levels of vacant land.

00614/2/001 Cranhill Development Trust - All unused land should be developed for a mixture of social and private housing.

**Summary of responses (including reasons) by planning authority:**Objecting

00143/11/001 Muriel Pearson, 00442/1/002 Glasgow Centre for Population Health, 00614/2/001 Cranhill Development Trust - Policy CDP2 of the Plan states that the Council will support new development proposals that will utilise brownfield sites in preference to greenfield sites; and prioritise the remediation and reuse of vacant and derelict land. In addition, Policy CDP1 indicates that new development should help bring vacant and derelict land back into effective use via both short term (e.g. Stalled Spaces) and long term solutions. This approach is considered to be in line with both Scottish Planning Policy (CE2) and the Glasgow and Clyde Valley Strategic Development Plan (CE6). Nevertheless, there will be instances where vacant and derelict land can be justifiably used for purposes other than development, including for integrated green infrastructure or for biodiversity. In addition, vacant and derelict land is being developed, and new areas of vacant and derelict land are being created, on a continual basis. The Scottish Vacant and Derelict Land Survey is also updated on a yearly basis. Given this ongoing change, it is considered that identifying all vacant and derelict land in the Plan for regeneration could only be for illustrative purposes, at a single point in time. It is considered that the commitments in Policies CDP1 and CDP2 are sufficient.

No modifications recommended.

**Reporter's conclusions:**

1. In relation to the objection from Glasgow Centre for Population Health, I am satisfied that the Proposed Plan contains clear policy support for the development of vacant land, in accordance with national and strategic planning policies. Policy CDP1 expects new development to bring, wherever possible, vacant and derelict land back into effective use by means of short and long term solutions. Policy CDP2 supports new development proposals which utilise brownfield sites in preference to greenfield ones, and which prioritise the remediation and reuse of vacant and derelict land.
2. However it is not realistic or desirable to expect all vacant land which is identified in the annual Derelict Land Survey to be developed, as the picture is constantly changing as new areas of derelict land arise and others disappear. Not all derelict land is suitable for redevelopment, and some areas may have more potential for amenity, recreation or habitat creation, for example.

3. I note the representations in support of the Proposed Plan which are summarised above, but they do not raise any unresolved issues which I require to examine.

**Reporter's recommendations:**

No modifications.

Issue 09	Local and Strategic Development Frameworks	
Development plan reference:	Policy CDP 2 Sustainable Spatial Strategy (Pages 32-34)	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Muriel Pearson (00143) Garnethill Community Council (00450) Hillhead Community Council (00479) Hilary Stanger (00489) Retail Property Holdings (RPH) (00491) Wheatley Group (00501) Scottish Enterprise (00533) Pollokshields Community Council (00609) Yorkhill and Kelvingrove Community Council (00623) Strathclyde Partnership for Transport (00633) Dowanhill Hyndland and Kelvinside Community Council (00637) Clyde Gateway URC (00664)</p>		
Provision of the development plan to which the issue relates:	Spatial Supplementary Guidance will be prepared in the form of Strategic Development Frameworks and Local Development Frameworks in some areas of the City where intervention is required in order to achieve the Plan's aims. Strategic Development Frameworks will cover large areas of the City, which span beyond neighbourhood level, and Local Development Frameworks will guide development at a neighbourhood level.	
Planning authority's summary of the representation(s):		
<p><u>Objecting</u></p> <p>00143/6/001 Muriel Pearson - Cranhill warrants priority status in the Plan and should be subject of a planning framework. This would allow the Plan to focus on the distinctive opportunities and challenges faced by Cranhill to realise the potential of the area and build upon the asset based approach to regeneration already being pursued by organisations in the area.</p> <p>00143/8/001 Muriel Pearson - Since 2011, the Church of Scotland has been piloting an asset-based regeneration Initiative called 'Chance to Thrive' in 8 of the poorest parishes in Scotland. 5 of these, including Cranhill, are in Glasgow. Glasgow City Council's asset-based approach pilot areas encompass Easterhouse, Barlanark and Queenslie (which is part of Cranhill Parish) but not Cranhill itself. It does not make sense that an asset-based approach to neighbourhood regeneration should not include in one of its pilot areas a community which is already seeking to work in an asset-based and partnership way. The SOA `Thriving Places' pilot should be extended to include Cranhill.</p> <p>00450/3/001 Garnethill Community Council - Objects to the inclusion of Garnethill within the predominantly commercial area of 'Sauchiehall' in the City Centre Strategy and Action Plan 2014. This illustrates a lack of understanding of Garnethill's distinct nature and sense of place and could undermine the continuing development of the area as a</p>		

culturally and socially vibrant residential place that stands apart from the commercial interests of 'Sauchiehall'.

00479/15/001 Hillhead Community Council - Cannot support the proposal for a Govan/Partick Strategic Development Framework in the absence of any detail of what it is likely to contain, especially if this is to be used as the basis for making decisions on development applications. In addition, it is not clear why Govan and Partick, different communities on opposite banks of the Clyde, are linked. The reasons for this should be made clear.

00637/17/002 Dowanhill Hyndland and Kelvinside Community Council - General support for the Partick/Govan Strategic Development Framework. This must however ensure that on the River Front of the Clyde, any new development is provided with true connectivity to existing neighbourhoods.

00489/1/001 Hilary Stanger - Generally support the draft policy CDP 2 Sustainable Spatial Strategy. However, seek clarification of the extent of the proposed Local Development Framework for South Central (as indicated on Figure 9). The area of the South Central LDF should be clarified and should include East Pollokshields and Port Eglinton.

00609/2/001 Pollokshields Community Council - Support policy CDP 2. However, seek clarification of the extent of the proposed Local Development Framework for South Central that is indicated on Figure 9 Sustainable Spatial Strategy. Request that the area for the South Central Local Development Framework is clarified/crystallised and that it extends to cover East Pollokshields and Port Eglinton as well as, from a strategic point of view, the Eglinton St corridor, including Pollokshaws Rd up to Shawlands Cross.

00501/6/001 Wheatley Group - A sustainable spatial strategy is essential to address the challenges of climate change and to deliver a healthier environment. Agree with the aim of a compact city form which supports sustainable development, and the preparation of SDFs and LDFs, but believe this approach needs to be pursued sensitively. There are existing, ongoing programmes of regeneration and care must be taken to maintain the momentum of these and to ensure that the preparation of the frameworks does not lead to delayed investment decisions or the creation of uncertainty. Established strategies, including TRAs, should be seen through and not unnecessarily revisited.

00633/30/001 Strathclyde Partnership for Transport - Action 47: City Centre Strategic Development Framework. Explain relationship to City Centre Strategy.

00664/2/001 Clyde Gateway URC - The Clyde Gateway falls within with the River Clyde Development Corridor, one of 6 Strategic Development Frameworks to be prepared during the life of the plan. Whilst supportive of the Clyde Gateway being within an SDF area, it should be made clear that the Clyde Gateway area of operation does not share the same boundary as the SDF area and faces different issues to the other locations within it.

### Supporting

00491/10/001 Retail Property Holdings (RPH) - Supports both the policy aim of influencing the location of development to create a compact city form and the use of the proposed Local Development Framework at Pollok, in order to refresh efforts to support regeneration. An increased density of development at sustainable locations, e.g. Pollok

Town Centre, will help to deliver the benefits of sustainable economic growth in locations most accessible to the community and with minimal impact on the natural environment. Would welcome an opportunity to engage with the LDF consultation process.

00533/1/001 Scottish Enterprise - Supports the approach to meeting regeneration challenges, recognising that different approaches may be required in different areas. Wishes to participate in the development of the Glasgow North SDF, in the context of the important role that the former Ruchill Hospital site can play in support of the wider regeneration priorities of the area, housing land in particular.

00623/9/001 Yorkhill and Kelvingrove Community Council - We support Policy CDP2 (and map). We advocated the promotion of a master plan for the development of the Yorkhill Hospitals site at the previous consultation stage and are delighted to see this proposal confirmed. This warrants public involvement at the earliest possible stage, in the spirit of the Community Empowerment Bill currently in progress through the Scottish Parliament. Adequate time must be allowed for public consultation and the analysis of alternative concepts, in principle and detail, if the best result is to be achieved for our area and the wider inner west of the City.

**Modifications sought by those submitting representations:**

00143/6/001 Muriel Pearson - Cranhill should be designated priority status by being shown as an area for which a development framework should be prepared on Figure 9 Sustainable Spatial Strategy.

00143/8/001 Muriel Pearson - The SOA thriving places pilot should be extended to include Cranhill.

00450/3/001 Garnethill Community Council - Garnethill should be given clear, unambiguous, recognition (in the plan and its maps) as a distinct place.

00479/15/001 Hillhead Community Council - Govan/Partick should be defined as an area to be looked at with a view to improvement, rather than as a regeneration area. The Plan should state that any development applications will be looked at very carefully in view of the importance of the area and the masterplan for regeneration which is to be created. The reasons why Govan and Partick have been linked in one Strategic Development Framework should be made clear.

00637/17/002 Dowanhill Hyndland and Kelvinside Community Council - None.

00489/1/001 Hilary Stanger - The area of the South Central LDF should be clarified and should include East Pollokshields and Port Eglinton.

00609/2/001 Pollokshields Community Council - Clarify the area for the South Central Local Development Framework. Request that it extends to cover East Pollokshields and Port Eglinton as well as the Eglinton St corridor, including Pollokshaws Rd up to Shawlands Cross.

00501/6/001 Wheatley Group - The Plan should make it clear that the preparation of SDFs and LDFs should not undermine existing strategies which should be seen through and not unnecessarily revisited.

00633/30/001 Strathclyde Partnership for Transport - Explain relationship between City Centre Strategic Development Framework and City Centre Strategy.

00664/2/001 Clyde Gateway URC - The Plan should clarify that Clyde Gateway is a standalone organisation with a geographical boundary and is not the same entity as the 'River Clyde Development Corridor' Strategic Development Framework area.

**Summary of responses (including reasons) by planning authority:**

Objecting

00143/6/001 Muriel Pearson - The Council has completed scoping work for the Greater Easterhouse Strategic Development Framework area and would agree that Cranhill should be included within the boundary due to its strategic importance in relation to neighbouring communities in Greater Easterhouse.

The Reporter could, if so minded, amend Figure 9 of the Plan to show an enlarged shaded indicative area for the Greater Easterhouse Strategic Development Framework to include Cranhill. This would provide greater clarity regarding the extent of the SDF area.

00143/8/001 Muriel Pearson - The SOA Thriving Places pilot areas were designated through an initiative that is separate from the Local Development Plan process. The Plan does refer to the preparation of Strategic Development Frameworks (SDFs) for six priority areas throughout the City that require intervention. The Council has completed scoping work for the Greater Easterhouse SDF and would agree that Cranhill should be included within its boundary due to its strategic importance in relation to neighbouring communities in Greater Easterhouse.

The Reporter could, if so minded, amend Figure 9 of The Plan to show an enlarged shaded indicative area for the Greater Easterhouse Strategic Development Framework to include Cranhill.

This would provide greater clarity regarding the extent of the SDF area.

00450/3/001 Garnethill Community Council - The City Centre Strategy and Action Plan 2014-19 (OC51) was subject to a separate public consultation process prior to its approval by Glasgow City Council. It defined the 9 District Areas within the City Centre including 'Sauchiehall'. Community engagement is currently underway to inform the development of the 'Sauchiehall Local Development Framework' which includes Garnethill within its boundary. Visit [www.Sauchiehall.Net](http://www.Sauchiehall.Net) for further information.

No modifications recommended.

00479/15/001 Hillhead Community Council, 00637/17/002 Dowanhill Hyndland and Kelvinside Community Council - Glasgow City Council is in the process of engaging with all stakeholders and interested parties in advance of preparing the Govan Partick Strategic Development Framework (SDF), which will set out development and infrastructure constraints and opportunities in the Govan/Partick area of the City. A charrette took place on 16-19 March 2015. Further information on the charrette can be found at [www.Govanpartick.Com](http://www.Govanpartick.Com).

No modifications recommended.

00489/1/001 Hilary Stanger, 00609/2/001 Pollokshields Community Council - The scoping and survey work required as the first stage of preparing the South Central Local Development Framework (LDF) will determine an appropriate boundary for the LDF area. Timescales are not yet known for work to commence, but when they are, the Council will fully engage with all stakeholders and interested parties to take the process forward.

No modifications recommended.

00501/6/001 Wheatley Group - The proposed Strategic Development Frameworks and Local Development Frameworks will provide a spatial context for future development in specific areas of the City. These Frameworks are not intended to undermine existing priority areas. Indeed, by outlining a shared vision and future development intentions for the wider area, they should provide certainty for investment decisions including the delivery of existing regeneration priority areas.

The Action Programme, which accompanies the Plan, also highlights timescales and funding arrangements to ensure there is no conflict.

The Reporter could, if so minded, amend The Plan by adding the following text at the end of Context section of Policy CDP 2 (page 32) to ensure the Plan is clear that existing regeneration areas remain top priorities:

"The proposed Strategic Development Frameworks and Local Development Frameworks will provide a spatial context for future development in specific areas of the City. By outlining a shared vision and future development intentions for the wider area, it is anticipated that the Framework will provide certainty for investment decisions including the delivery of existing regeneration priority areas."

00633/30/001 Strathclyde Partnership for Transport - An explanation of the relationship between these documents has already been given on page 32 (Policy CDP 2, Strategic Development Frameworks, 2nd paragraph).

No modifications recommended.

00664/2/001 Clyde Gateway URC - It is considered that this level of detail is not required in the Plan. Sufficient detail regarding Clyde Gateway can be found in Background Paper 2 - Sustainable Spatial Strategy (OC52 pg. 11 & 12).

No modifications recommended.

### **Reporter's conclusions:**

#### Cranhill

1. The council accepts the objector's contention that Cranhill should be included within the boundary of the Greater Easterhouse Strategic Development Framework (SDF). As one of the poorest parishes in Scotland, Cranhill merits the 'priority status' which is sought, and it would have appeared perverse to exclude this community (which is already working in a partnership fashion) from the SDF area. I therefore agree that Figure 9 should be modified to extend the shaded indicative area for the Greater Easterhouse Strategic Development Framework to include Cranhill.



2. However Glasgow's Single Outcome Agreement (SOA) is the result of a separate process which is outwith the development plan. I therefore cannot comment on the suggestion that the SOA thriving places pilot should include Cranhill.

### Garnethill

3. I can appreciate the desire of the community council to ensure that the council recognises the distinctive nature of Garnethill, and that it is not just subsumed into the adjoining commercial area around Sauchiehall Street. However, I note that what is now termed the Sauchiehall and Garnethill District Regeneration Framework is the result of engagement with residents, businesses and organisations in the area. Amongst the four strategic themes of the framework are 'a living district' and 'local distinctiveness', and I am confident that Garnethill's special character and sense of place will be respected in the framework which emerges from the process.

### Govan/Partick Strategic Development Framework

4. The proposal to prepare an SDF for Govan and Partick is to be welcomed. Whilst these two communities are separated by the River Clyde, the Framework will examine how to improve linkages between them, and how to ensure any new development on the riverfront is properly connected to existing neighbourhoods. This work will be to the benefit of Govan and Partick, and the City in general.

### East Pollokshields and Port Eglinton

5. Work has yet to start on scoping and preparing the South Central Local Development Framework (LDF), so it is too early to determine the boundary for the LDF area. It is not for this examination to attempt to draw such a detailed boundary. However, the council has undertaken to consult with stakeholders (which will include Pollokshields Community Council and other interested parties) on this matter at the appropriate time.

### Strategic Development Frameworks and Local Development Frameworks

6. I consider that the understandable concern raised by the Wheatley Group to ensure that existing, ongoing regeneration programmes are not delayed by the preparation of strategic and local development frameworks would be answered by inserting the additional paragraph of clarification at page 32 of the Proposed Plan, as suggested by the council.

### City Centre Strategic Development Framework

7. I accept that the relationship between the City Centre Strategic Development Framework and the City Centre Strategy and Action Plan 2014-2019 is already explained at page 32 of the Proposed Plan.

### The Clyde Gateway

8. I do not foresee any potential confusion between the River Clyde Development Corridor which is to be the subject of a strategic development framework, and the Clyde Gateway URC which has a different boundary. I therefore see no need to insert additional text into the Proposed Plan to explain the difference.

Supporting representations

9. I note the representations in support of the Plan which are summarised above, but they do not raise any unresolved issues which I require to examine.

**Reporter's recommendations:**

Modify Figure 9 of the Proposed Plan to show an enlarged shaded indicative area for the Greater Easterhouse Strategic Development Framework to include Cranhill.

Modify the Proposed Plan by adding the following text at the end of Context section of Policy CDP2 (page 32):

*"The proposed Strategic Development Frameworks and Local Development Frameworks will provide a spatial context for future development in specific areas of the City. By outlining a shared vision and future development intentions for the wider area, it is anticipated that the Frameworks will provide certainty for investment decisions including the delivery of existing regeneration priority areas."*

Issue 10		Economic Development	
Development plan reference:	Policy CDP 3 Economic Development (Pages 35-36)		Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):			
The Industrial Property Investment Fund (00456) United Wholesale (Scotland) Ltd (00457) The University of Glasgow (00474) Hillhead Community Council (00479) Cathcart Developments Ltd (00490) Retail Property Holdings (RPH) (00491) Forge Properties LLP (00493) Persimmon Homes (00497) Whitbread plc (00500) Mobile Operators Association (00538) Allied Vehicles Limited (00545) Helical Bar (Cathcart) Ltd (00546) Diageo Scotland Ltd (00554)		Royal Mail Group (00578) Dandara Ltd (00604) Chris Breslin (00611) Paradigm CB1 (00613) Barratt Homes West Scotland (00627) John Lewis (00630) Christ's Hospital Foundation (00631) Strathclyde Partnership for Transport (00633) George Capital LLP (00636) Dowanhill Hyndland and Kelvinside Community Council (00637) Spectrum Properties (Scotland) Ltd (00652) Clyde Gateway URC (00664)	
Provision of the development plan to which the issue relates:	Policy CDP 3 - Economic Development is one of ten detailed policies in the Plan which contributes to meeting the requirement of the two overarching policies. Policy CDP3 seeks to promote the creation of economic opportunity for all the City's residents and businesses and encourage sustained economic growth.		
Planning authority's summary of the representation(s):			
<u>Economic Development Policy Wording</u>			
<u>Objecting</u>			
00479/31/001 Hillhead Community Council - Support for Policy CDP3 - Economic Development but concern over the lack of detail in relation to affordable housing, education (including student accommodation) and planning agreements.			
00497/10/001 Persimmon Homes - Objection regarding the weighting given to retail and commercial investment in Policy CDP 3 - Economic Development. Residential Development accounts for a significant portion of economic growth in Glasgow. The policy would be more robust if it referred to the contribution that residential development makes to the City's economy.			
00545/1/002 Allied Vehicles Limited - Objection to the wording of Policy CDP 3 - Economic Development. The Plan should recognise the importance of Balmore Industrial Estate, which is a significant employment site for the north of the City and the City as a whole. The site has been developed in an ad hoc manner over many years and would benefit from a comprehensive review to establish the contribution which it can best make to the economic regeneration of the area.			
00545/1/003 Allied Vehicles Limited - Within draft Policy CDP 3, within the first bullet point ("Promote Economic Growth by :"), an additional sub point should be added as a first			

point with the following text: "supporting and encouraging existing employment-generating business and industry".

00627/2/001 Barratt Homes West Scotland - Support for Policy CDP 3. It is considered, however, that Policy CDP 3 should acknowledge the economic development opportunities offered by the housebuilding industry, including creation of jobs, council tax revenue, training opportunities, infrastructure improvements and local economic opportunities.

00633/12/001 Strathclyde Partnership for Transport - Policy CDP 3 - Economic Development should include additional aims in relation to economic growth which promote improved active travel and public transport networks. This would make Glasgow a more attractive place to invest and stay.

00637/8/001 Dowanhill Hyndland and Kelvinside Community Council - Objection to Policy CDP3 - Economic Development as it relates to the International Financial Services District. The sense of place within the IFSD could be further enhanced by creating more active frontages, limiting the number of 'cold canyons', allowing fewer high rise buildings and encouraging more shops and hotels.

00637/9/001 Dowanhill Hyndland and Kelvinside Community Council - Decentralisation of office and commercial activity should be sought, particularly to the East End of the City, to improve quality of place and space and to ensure the more equitable distribution of wealth.

00664/6/001 Clyde Gateway URC - Support for the identification of a Strategic Economic Investment Location and Opportunity Sites within the Dalmarnock Area. Concern raised, however, regarding the lack of a specific reference to the South Dalmarnock Integrated Infrastructure Framework. This should be the key document for future development in this area.

#### Supporting

00474/3/001 The University of Glasgow - Support for the recognition in the Plan that higher education, and the whole range of activities related to higher education, are a significant contributor to Glasgow's economy.

00474/3/002 The University of Glasgow - Support for the clear identification of both the Gilmorehill/Hillhead/Western Infirmary Campus and the South Glasgow Hospitals Campus as Economic Development Areas (Policy and Proposals Maps for City Wide and North West and Figure 10 (Policy Context Diagram) on Page 36 of the Proposed CDP).

00474/3/004 The University of Glasgow - Support for the commitment within Policy CDP 3 - Economic Development to promote Glasgow as a Learning City by supporting the growth of higher and further education institutions and other training opportunities.

00491/7/001 Retail Property Holdings (RPH) - Welcomes the support set out for creating employment opportunities within the city's town centres.

00636/9/001 George Capital LLP - Support for Policy CDP3 - Economic Development which supports development proposals that promote economic growth (including the City Centre as a Strategic Economic Investment Location) and reinforces the role of the City Centre as the primary location within the City-region for retail, employment, leisure,

tourism and evening economy uses.

### Telecommunications

#### Objecting

00538/1/001 Mobile Operators Association - Seeks the inclusion of a policy on telecommunications in the Plan. Telecommunications play a vital role in both the economic and social fabric of communities, and this is acknowledged by national policy guidance.

### Economic Development Areas

#### Objecting

00456/1/001 The Industrial Property Investment Fund - Milnpark Industrial Estate should be reallocated from its existing Development Policy Principle DEV 3 Industry and Business to Proposed Addition to Housing land Supply within the adopted City Development Plan. The site has been actively marketed for the past 10 years with little interest in occupiers for business and industry space. There has been high ongoing vacancy rate over this period. The site is suitable for housing, being adjacent to a residential area.

00457/2/001 United Wholesale (Scotland) Ltd - Objection to the designation of land at 110 Easter Queenslie Road as an 'Economic Development Area'. This site should be re-designated for Mixed Use (which would support alternative leisure and commercial land uses) due to the location of the site and the changing character of the area. Ancillary facilities that support industrial and economic areas should be favourable, where these enhance the attraction of the area for industrial and business investment.

00490/1/001 Cathcart Developments Ltd - Objection to the inclusion of land at Cathcart Road/Caledonia Road within an Economic Development Area. This site has been granted planning permission for a mixed used development and should be re-designated as Mixed Use.

00493/1/001 Forge Properties LLP - Objection to the inclusion of land at Carlisle Street in an Economic Development Area. This site should be designated as Mixed Use. A proposed mixed use scheme is the subject of an on-going planning application for this site.

00546/1/001 Helical Bar (Cathcart) Ltd - Representation seeking the re-designation of the Scottish Power site at Cathcart from 'Economic Development Area' to 'Mixed Use' or 'Residential'. The site is set in a sector of the City residential in character, well served by public transport and close to local services (Cathcart Town Centre) and primary schools. The site has been identified as an area which retains an important employment function but where there may be scope for change. In addition, the site is the subject of an in principle planning application for housing and represents a windfall brownfield opportunity.

00554/1/001 Diageo Scotland Ltd - Objection to Port Dundas being identified as an Economic Development Area. This designation does not provide clarity on future potential development options. Redevelopment to uses other than business/industrial such as housing and commercial uses (leisure, restaurants, retail and hotels) is the clear future of

this site given its location adjacent to the Canal and its connections to the City Centre. The site has been the subject of a Design Charrete which promoted redevelopment for a mixed of alternative uses.

00578/2/001 Royal Mail Group - Representation seeking the inclusion of Lochburn Road within the adjacent Economic Development Area on the grounds that the area is currently characterised by Class 4 uses and is the ideal location for further similar investment. This would ensure the right level and type of investment in the future, support and improve the local business environment and would ensure the continued use of the Royal Mail Group (and associated jobs) in the area by protecting the existing operation from inappropriate neighbour development.

00604/1/002 Dandara Ltd - Dandara propose to redevelop the Cheapside Street site predominantly for residential purposes with ancillary landscaping and car parking and a small element of commercial use. The designation of part of the site as falling within an area identified as Economic Development Area should be removed. Previous proposals on site have included substantial residential development, as do current proposals, the principle of which has been accepted. It is therefore misleading to include part of the site within an Economic Development Area. Whilst commercial development may form part of the final proposals, it is a residential led development site.

00611/2/001 Chris Breslin - Objection to the designation of Garscube Estate and Port Dundas as Economic Development Areas. Policy for these areas should reflect the: masterplan study for the Spiers Wharf area; and recent charette for Port Dundas, which was supported by the Scottish Government. Both exercises recommended a more mixed use outcome for both areas, including residential use.

00613/1/001 Paradigm CB1 - Objection to the inclusion of vacant land, adjacent to the office pavilions at Nova Business Park, as an Economic Development Area. This site should be re-designated as Mixed Use on the grounds that the surrounding area comprises a mix of retail development and residential development, a pub/restaurant is due to open adjacent to the site and the provision of additional facilities such as car showrooms, hotel, leisure, creche and retail would provide important supporting uses to the existing business park and would enhance its attractiveness.

00630/3/001 John Lewis - Objection to the John Lewis Distribution site on Lister Street being identified as an Economic Development Area. It is considered that this site should be re-designated as the facility is becoming less fit for purpose, the area has become significantly residential in character and is an appropriate location for future alternative development, including residential uses. A residential designation would secure the long term viability of the site.

00631/10/001 Christ's Hospital Foundation - Representation seeks the re-designation of Baillieston Distribution Centre (which is a proposed Economic Development Area) to a more appropriate and flexible designation such as Residential and Supporting Uses. This will allow for a wider range of tenants and encourage higher occupancy rates.

#### Supporting

00500/1/001 Whitbread plc - Support for Policy CDP3 - Economic Development which promotes the integration of compatible, employment supporting land uses in Economic Development Areas. Plan policies should promote flexibility in terms of uses within the

City Centre to allow the market to respond to changing demand and requirements. Allowing for a mix of uses and flexibility will help to maintain a vibrant and diverse City Centre.

### Other Designations

### Objecting

00474/3/003 The University of Glasgow - Objection to the exclusion of the Garscube Campus of the University as an Economic Development Area.

00613/2/001 Paradigm CB1 - Objection to the designation of the Thomson Pavilion and Telford Pavilion (part of West of Scotland Science Park) as a Strategic Economic Investment Location. It is considered that the identified buildings should be re-designated to allow for a wider range of uses, including food retail, on the grounds that the site has been vacant for approximately 5 years, despite being marketed extensively. And existing tenants can be successfully relocated. The Council's Review of Industrial and Business Areas will release areas like this for alternative uses and additional facilities would encourage greater occupational business requirements. It is proposed that the change for greater flexibility should be incorporated for this site.

00652/1/001 Spectrum Properties (Scotland) Ltd - Objection to the current industrial and business used designation at Strathclyde Business Centre on the grounds that a proposed residential development (in line with the Dalmarnock Master Plan) is in conflict with the Plan.

### **Modifications sought by those submitting representations:**

### Economic Development Policy Wording

00479/31/001 Hillhead Community Council - Policy CDP 3 to include more detail on affordable housing, education and planning agreements (including an explanation of what the implications of planning agreements are).

00497/10/001 Persimmon Homes - Add new bullet point to Policy CDP 3 to state that significant weight should be given to the economic impact of housing development in line with Scottish Planning Policy.

00545/1/002 Allied Vehicles Limited - Amend the policy to make specific mention of the role and importance of the Balmore Road Industrial Estate.

00545/1/003 Allied Vehicles Limited - Within draft Policy CDP 3, within the first bullet point ("Promote Economic Growth by:"), an additional sub point should be added as a first point with the following text: "supporting and encouraging existing employment-generating business and industry".

00627/2/001 Barratt Homes West Scotland - Amend Policy CDP 3 to acknowledge the economic development opportunities offered by the housebuilding industry.

00633/12/001 Strathclyde Partnership for Transport - Amend Policy CDP3 by adding an additional bullet point to the context, after "This is reflected in the following aims it identifies relative to economic growth", to read: "an improved active travel and public

transport network".

00637/8/001 Dowanhill Hyndland and Kelvinside Community Council - Amend the Plan to promote a greater sense of place in the International Financial Services District by creating more active frontages, limiting the number of 'cold canyons', allowing fewer high rise buildings and encouraging more shops and hotels.

00637/9/001 Dowanhill Hyndland and Kelvinside Community Council - Amend the wording of Policy CDP 3 - Economic Development to promote the decentralisation of office and commercial activity.

00664/6/001 Clyde Gateway URC - Amend policy CDP 3 to make specific reference to the South Dalmarnock Integrated Infrastructure Framework.

#### Telecommunications

00538/1/001 Mobile Operators Association - The Plan should include a new policy on Telecommunications - the objection suggests detailed wording. (See associated submission within Schedule 4)

#### Economic Development Areas

00456/1/001 The Industrial Property Investment Fund - Redesignate Milnpark Industrial Estate from Economic Development Area to residential.

00457/2/001 United Wholesale (Scotland) Ltd - Redesignation of land at 110 Easter Queenslie Road from 'Economic Development Area' to Mixed Use.

00490/1/001 Cathcart Developments Ltd - Change in designation of land at Cathcart Road/Caledonia Road from 'Economic Development Area' to 'Mixed Use' (to be illustrated on the City Development Plan South Policy and Proposals Map).

00493/1/001 Forge Properties LLP - Change in the designation of land at Carlisle Street from 'Economic Development Area' to Mixed Use' (to be illustrated on the City Development Plan North Policy and Proposals Map)

00546/1/001 Helical Bar (Cathcart) Ltd - Re-designation of the Scottish Power site at Cathcart site for either: Housing only (preferred option); or Mixed Use (to allow for Class 4 business and housing).

00554/1/001 Diageo Scotland Ltd - Re-designation of site at Port Dundas from 'Economic Development Area' to 'Mixed Use'. Clarity in the LDP about the potential future land uses acceptable in the area.

00578/2/001 Royal Mail Group - Amendment to Proposals Map to include existing industrial land (including the Royal Mail Group Delivery Office) at Lochburn Road, Maryhill within the designated Economic Development Area to the south east of Lochburn Road.

00604/1/002 Dandara Ltd - Remove the designation of part of the site of proposal H057 - Anderston Quay/Cheapside Street as falling within an area identified as Economic Development Area in the City Development Plan.



00611/2/001 Chris Breslin - Sites at Garscube Estate and Port Dundas should be re-designated as Mixed Use.

00613/1/001 Paradigm CB1 - The Plan should support additional facilities, including car showrooms, hotel, leisure and retail on land adjacent to Nova Business Park, Robroyston, currently within the Economic Development Area.

00630/3/001 John Lewis - The John Lewis Distribution site at Lister Street should be re-designated for residential use.

00631/10/001 Christ's Hospital Foundation - Re-designation of Baillieston Distribution Centre (BDC), Nurseries Road, Baillieston, G69 6UL as Residential and Supporting Uses.

#### Other Designations

00474/3/003 The University of Glasgow - Identification of the Garscube Campus as an Economic Development Area (on the Policy and Proposals Maps (City Wide and North West) and as a "Hospital/University Campus" in Figure 10 (Policy Context Diagram) on Page 36 of the Proposed CDP.

00613/2/001 Paradigm CB1 - The Plan should be changed positively to support additional facilities at West of Scotland Science Park including food retail.

00652/1/001 Spectrum Properties (Scotland) Ltd – Re-designation of Strathclyde Business Centre for residential use.

#### **Summary of responses (including reasons) by planning authority:**

##### Economic Development Policy Wording

##### Objecting

00479/31/001 Hillhead Community Council - The scope and aims of the policy have accommodated linkage to the roles of Higher and Further Education institutions in Economic Development and it recognises the importance of having a good quality housing supply. However, to extend the scope of the policy coverage to include more detail on tenures of residential accommodation would exceed the aims of the policy. The cross reference to CDP 12 Delivering Development within CDP3 is proposed to be altered in accordance with suggested modifications to that policy which rules out providing further detail on planning agreements.

No modifications recommended.

00497/10/001 Persimmon Homes, 00627/2/001 Barrett Homes West Scotland - The Policy sets out the economic development benefits of promoting the city's centres as employment generators, as well as attracting investment. It identifies the network of centres' role in terms of retail, employment, tourism and leisure. This is consistent with paragraph 94 of SPP (CE2) in respect of "Supporting Business and Employment" where it identifies tourism and food and drink sector as well as financial and business services as opportunities for growth. This section of SPP is silent on the role of the housebuilding industry. Housebuilding is referenced in respect of Economic Development in "Enabling Delivery of New Homes". Paragraph 109 of this section refers to the contribution house

building makes to the economy. It clarifies that provision for new homes should be made in areas where economic investment is planned. This reflects a distinction in that the identification of the role of the network of centres relates to land use opportunities for employment creation and economic investment, whereas housebuilding is seen as a key factor in supporting locations where economic development is taking place. The Policy acknowledges this important supporting role in identifying that the Glasgow Strategic Plan (OC31) (page 9) aims to support economic growth via an improved supply of good quality housing in the City. Given this context it is considered that giving greater weight to the role of housebuilding in policy by incorporating a new bullet point would exceed the emphasis required by SPP and thereby skew the intentions of the Policy.

No modifications recommended.

00545/1/002 Allied Vehicles Limited - The Policy has identified selected key economic development locations within its context section to illustrate the current position. Generally these relate to strategically important locations or reflect regional or national priorities. It would not be helpful to the policy to add other locations within the context without needing to alter the overall policy content or direction.

No modifications recommended.

00545/1/003 Allied Vehicles Limited - The addition of this bullet point would reinforce a key point made in the Policy's context.

The Reporter could, if so minded, modify the policy to incorporate a bullet point under "Promote economic growth by" which states "supporting and encouraging existing employment-generating business and industry".

00633/12/001 Strathclyde Partnership for Transport - The particular bullet points identified are interpretations of the "Economic Growth" aims set out in the Glasgow City Council Strategic Plan (OC31) (page 9) The inclusion of "an improved active travel and public transport network" would still reflect what the Strategic Plan says and would also reflect the criteria set out in the Policy.

The Reporter could, if so minded, add the suggested text to the final bullet point in the context section to read "Better access to the internet, information technology and an improved active travel and public transport network for business and residents"

00637/8/001 Dowanhill Hyndland and Kelvinside Community Council - The principles of the modification are considered to have merit. However to include particular design guidance for a single Economic Development designation would be inconsistent with the level of detail within the Plan and would, be more appropriate within supplementary guidance.

No modifications recommended.

00637/9/001 Dowanhill Hyndland and Kelvinside Community Council - The Strategic Development Plan (CE6) (para. 4.19) identifies Glasgow City Centre as the Primary Strategic Economic Investment Location (SEIL). The Strategic Development Plan identifies the numerous unique components that make the city centre the Country's primary metropolitan centre and the city-region's economic core and the City Centre SEIL as having a business and financial services role. Within this context it is clear that the City

Development Plan must reflect the strategic priority given to the city centre and avoid eroding the importance of its role. The reality is that the nature of investment being encouraged and attracted to the city centre is largely a consequence of the various unique advantages of the city centre, therefore directing this investment to other locations in the city would be unlikely to be successful. However that is not to say that office and commercial activity should not be promoted elsewhere. Policy CDP 4 Network of Centres seeks to promote the principles of Town Centres First (as set out in that policy) to direct appropriate footfall generating uses including businesses and commercial activities to the city's network of centres. This approach is reinforced in Policy CDP 3 which promotes all town centres as opportunities for creating employment. The approach set out is considered to correctly reflect what is expected by the Strategic Development Plan, and the proposed modification would change the emphasis and undermine the strategy of prioritising the City Centre SEIL.

No modifications recommended.

00664/6/001 Clyde Gateway URC - The South Dalmarnock Integrated Infrastructure Framework (OC60) with associated Committee Report (OC60A) represents a significant material consideration for the area that it covers. The Framework and the EDA and SEIL designations are not coterminous but the Framework does cover much of the southern portion of the CDP designation.

The level of detail contained in the Plan reflects the more strategic approach that it has taken. On this basis it would be inconsistent to refer explicitly to this particular Framework within the text of the policy when other spatial frameworks or masterplans are not mentioned. Therefore it is not considered appropriate to reflect the Framework's status within the Policy text. However, it should be noted that a representation from the same contributor which appears in Issue Number 55 "Policy and Proposals Map" (reference 00664/6/002) has raised the fact that the Framework does not appear in the Policy and Proposals map and the Council's response recognises the status of the Framework as a masterplan and invites the reporter to include the site as a Masterplan on the Map.

No modifications recommended.

### Telecommunications

#### Objecting

00538/1/001 Mobile Operators Association - The Plan contains policies which operate at a strategic, City-wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan.

It should be noted that Policy CDP 3 sets out proposals that digital infrastructure will be supported. Issue 54 provides details of how the Council would propose to modify the policy to make the linkage to the supplementary guidance more explicit.

No modifications recommended.

Economic Development AreasObjecting

Policy CDP 3 sets out that a review of existing Industrial Areas (which reflects the Economic Development Areas (EDA's)) will be undertaken to identify which of the Areas could provide the opportunity for a planned integration of alternative uses. The intention is to undertake the review to establish the holistic position for all of the City's EDA's, so that decisions on the future status of EDA's are made in knowledge of the city-wide context as well as the site specific circumstances. The details of each submission will contribute towards the site specific circumstances. It is therefore considered premature to support any re-designation or revision of status of part or an entire EDA until the review process of EDA's has been undertaken.

It should be noted some representations promote reallocation to either residential or mixed use allocations. For clarification there is no mixed use land use designation within the Proposals map and this is not considered appropriate given the Placemaking context that covers the entire Plan area and will consider the relationship between uses. Similarly there is no Residential designation in the Plan as there was in City Plan 2. It should be confirmed that the representations have sought for a re-designation rather than seeking to promote sites as residential proposals.

In respect of supporting uses Policy CDP 3's supplementary guidance will set out the assessment criteria for non-business or industry uses within EDA's.

In some appropriate cases individual responses to submissions are provided below to provide any further necessary information or clarification.

00456/1/001 The Industrial Property Investment Fund, 00457/2/001 United Wholesale (Scotland) Ltd, 00490/1/001 Cathcart Developments Ltd, 00578/2/001 Royal Mail Group, 00604/1/002 Dandara Ltd, 00613/1/001 Paradigm CB1, 00630/3/001 John Lewis - The re-designation as proposed would be premature until the review of existing industrial areas has been completed.

No modification recommended.

00493/1/001 Forge Properties LLP - Planning application reference 09/01507/DC (OC59) for "Erection of mixed use development including Class 1 retail, Class 4 business, petrol filling station, coffee kiosk, gymnasium" was presented to Committee after the end of the publication period of the Proposed City Development Plan. The Council is minded to grant subject to the completion of a Section 75 Agreement relating to public transport provision. The area affected by the planning application covers the southern portion of the EDA location (less than half of the designation area) and it is noted that of the proposed new build layout drawing (OC 59) just over half would relate to business units. Given this context, it is clear that the application will not change the status of the vast majority of the site. On this basis it is not considered appropriate to alter the designation on the basis of the minded to grant application reference 09/01507/DC. However it should be noted that the Council would seek to incorporate the position set by the application as part of the Existing Industrial Areas Review.

No modifications recommended.

00546/1/001 Helical Bar (Cathcart) Ltd – The northern portion of the EDA designation has been granted planning permission 14/01770/DC (OC61) in principle for residential development. The southern portion remains in employment use accommodating a significant single employer site. The northern portion is surrounded by residential development (with the exception of the southern element) and is bounded to the north and east by the White Cart River. These circumstances do illustrate a reasonable case for removing the northern portion of the EDA from the designation but the Council would be willing to consider taking the site through the review process in order to accommodate any alteration to the boundary that may be considered appropriate.

The Reporter could, if so minded, alter the boundary of the EDA to remove the application site reference 14/01770/DC from the designation.

00554/1/001 Diageo Scotland Ltd, 00611/2/001 Chris Breslin - Since the publication of the proposed City Development Plan the Port Dundas Planning Charrete final report (OC58) has been published and this sets out that a masterplan shall be prepared covering factors including form, scale, phasing of development as well as mix of uses and multiple other design parameters. These will inform a Framework for Port Dundas that will ultimately be formed as supplementary guidance at the Local Development Framework level that will inform the future development of the locale.

The position in respect of the EDA has clearly evolved since the proposed Plan was published and in these circumstances it is considered reasonable that the EDA is now superseded and the masterplan area containing it should be retained instead.

The Reporter could, if so minded, remove the EDA designation shown in the accompanying Plan from this location but retain the masterplan designation to allow the Port Dundas Framework supplementary guidance set the spatial direction for the location.

00652/1/001 Spectrum Properties (Scotland) Ltd – Discussions have established that a previous residential consent on the site has not been implemented and has now lapsed. That permission was tied to the relocation of employment uses to an adjacent site. It is recognised that an application is being prepared for the site. However in these circumstances it is considered premature to change the designation prior to the conclusion of any application and any associated legal agreements that it may include.

The Economic Areas Review will allow the opportunity to revisit the position should it progress and this may involve a revision in the allocation.

No modification recommended.

00631/10/001 Christ's Hospital Foundation - The review of the City's Economic Developments Areas will inform any alternative use (not Class 4, Class 5, Class 6) being supported. The Plan does not include 'Residential and Supporting Uses' as a land use designation. CDP 1 The Placemaking Principle applies City-wide providing a framework for development and flexibility in terms of land use potential.

No modifications recommended.

Other DesignationsObjecting

00474/3/003 The University of Glasgow – The Gartcubie Campus within the boundary of Glasgow City Council contains the Glasgow Veterinary School along with other bio research facilities. It is a location of employment and education and on this basis is considered to reflect policy aim of promoting Glasgow as a learning city. Given this context it is considered that the modification proposed is reasonable and that making the Campus an EDA would be consistent with the policy intentions.

The Reporter could, if so minded, introduce an EDA designation to the Policy and Proposals Map in accordance with the corresponding location map for this representation.

00613/2/001 Paradigm CB1 – The designation of the entire West of Scotland Science Park as a SEIL is set out in the Glasgow and Clyde Valley Strategic Development Plan (CE6) (Diagram 11) and is, therefore, not a designation that can be changed within the City Development Plan. The corresponding EDA shall form part of the review of industrial areas, however, given the context set by the Strategic Plan it is considered very unlikely that the review would conclude promotion of re-designation.

No modifications recommended.

**Reporter's conclusions:**Policy CDP3: Economic Development

1. Policy CDP3 indicates that the Proposed Plan will support development proposals that promote economic growth, promote Glasgow as a learning city, ensure Glasgow's town centres are vibrant places, ensure the City has an adequate range of marketable sites, support and improve the City's infrastructure, and locate low amenity industrial operations on sites that will minimise the environmental impact on surrounding areas.

Affordable housing, education and planning agreements

2. It would not be appropriate to consider affordable housing or student accommodation under the heading of economic development, though there is recognition within policy CDP3 of the key role of higher and further education institutions in Glasgow. Also one of the identified aims relative to economic growth is an improved supply of good quality housing for the City. Policy CDP10: Meeting Housing Needs contains a section on student accommodation. Planning agreements are considered under Issue 53: Delivering Development.

Economic impact of housing development

3. Paragraph 109 of Scottish Planning Policy (SPP) recognises that house building makes an important contribution to the economy. In particular SPP advises that provision should be made for new homes in areas where economic investment is planned or there is a need for regeneration. SPP contains detailed advice on how to meet housing needs in the preparation of local development plans, but there is no suggestion that residential development should be separately referenced in the consideration of economic development. SPP highlights the potential of key sectors of the economy in Scotland with

particular opportunities for growth including: energy; life sciences, universities and the creative industries; tourism and the food and drink sector; and financial and business services.

4. I can therefore find no requirement to refer to the economic impact of housing development within policy CDP3. We address the extent to which the Proposed Plan meets the housing needs of the City in the discussion of policy CDP10 at Issue 17.

#### Balmore Industrial Estate

5. I appreciate the important employment function of Balmore Industrial Estate within north Glasgow, and note that the objectors wish to consider future options for their site. However policy CDP3 is essentially strategic in nature, and I agree with the council that it would be inappropriate to name one particular industrial estate, and not others, within the policy wording.

6. I do accept though that the policy would be improved by adding a bullet point which would clarify that the Proposed Plan will support development proposals that promote economic growth by “*supporting and encouraging existing employment-generating business and industry*”.

#### Active travel and public transport networks

7. I agree with Strathclyde Partnership for Transport that policy CDP3 should include additional aims relative to economic growth which promote improved active travel and public transport networks. That is best achieved by inserting an additional bullet point in the context section, as the council now suggests.

#### International Financial Services District (IFSD)

8. Dowanhill Hyndland and Kelvinside Community Council raises valid concerns about the need to create more active frontages, avoid ‘cold canyons’, and introduce more activity and variety within the IFSD. However local development plans are intended to be concise documents, and these detailed design and land use issues are better addressed in Supplementary Guidance as the council proposes.

#### Decentralisation of office and commercial activity

9. The suggestion that office and commercial activity should be decentralised, particularly to the East End, is contrary to the thrust of national and strategic planning policy which directs such activity to the City Centre.

10. Scotland’s Third National Planning Framework (NPF3) emphasises that city centres are key assets for attracting investment and providing services. The Glasgow and Clyde Valley Strategic Development Plan identifies Glasgow City Centre (and surrounding areas) as a Strategic Economic Investment Location, where business and financial services/green technologies are expected to have the dominant role and function

11. Nonetheless policy CDP3 also supports development proposals that ensure that Glasgow’s town centres are vibrant places in which to live and work, by supporting the creation of employment opportunities in them in accordance with policy CDP4 (which notes that the major town centres provide a full range of town centre uses).

12. I am content that the Proposed Plan strikes the right balance between promoting the city centre as the primary location for office and commercial activity, and allowing an appropriate measure of commercial uses in the other town centres within the City.

#### South Dalmarnock Integrated Infrastructure Framework

13. I note Clyde Gateway's support for the identification of a Strategic Economic Investment Location and Opportunity Sites within the Dalmarnock Area. However I accept the council's position that there is no need to make a specific reference to the South Dalmarnock Integrated Infrastructure Framework within policy CDP3. To do so would suggest that a range of other important references would also have to be mentioned in the policy. That would be unnecessary and would run contrary to the intention that local development plans should be concise documents. However, within our discussion in Issue 55 we have concluded that there should be a masterplan for the site.

#### Letters in support

14. I have taken account of the support for various elements of the policy from the University of Glasgow, Retail Property Holdings and George Capital LLP.

#### Telecommunications

15. The Proposed Plan recognises the vital role of telecommunications in facilitating economic development in the City. Policy CDP3 supports development proposals that support and improve the City's energy, transport and digital infrastructure. The supporting text highlights the importance of providing the physical and digital infrastructure that will attract investors to Glasgow in preference to competitor cities.

16. I do not consider that the absence of a specific policy addressing telecommunications is a serious omission, providing the issue is dealt with in Supplementary Guidance as proposed. The Supplementary Guidance would need to set out criteria to be applied when determining planning applications for telecommunications equipment, and the matters to be addressed in planning applications. It is proposed elsewhere at Issue 54 to strengthen and clarify the link between policy CDP3 and the associated Supplementary Guidance.

#### Economic Development Areas

17. Background Paper 3: Economic Development (OC67) acknowledges that as well as focusing on the opportunities for growth there is a need to address and capitalise on the City's industrial legacy, which has left substantial areas of underused industrial and business land. This should involve investigating what opportunities exist to improve the environment and infrastructure and to investigate alternative uses.

18. One of the uses which the Monitoring Statement identified as requiring to be addressed by the local development plan was "*the rationalisation of the City's poorer quality industrial and business areas to achieve a more sustainable land use pattern*".

19. The Main Issues Report stated that the City's industrial land supply would be reviewed to focus on sites which benefit from good access to the strategic road network and high public transport accessibility. The physical characteristics of all areas identified for Industry and Business in City Plan 2 were reviewed, leading to a categorisation as



'green' (stable employment locations), 'amber' (areas which retain an important employment function, but where there may be scope for change depending on the outcome of further study/ spatial Supplementary Guidance), or 'red' (areas where a change of designation is appropriate).

20. The next stage was to assess each area in terms of development activity, employment data, vacancy rates and links to multiple deprivation, in order to identify which areas should be retained as employment locations and which provide an opportunity to broaden the range of uses.

21. Page 35 of the Proposed Plan confirms that a review of all Economic Development Areas (EDAs) is to be undertaken in order to identify the areas which can help to achieve the City's economic objectives. The review will look at a range of factors including physical condition, infrastructure provision, demand potential and the availability of marketable land. Some areas will be afforded protection as Areas of City-Wide Economic Importance and the review will also identify those areas which may, through a planned process, provide opportunities for the planned integration of other land uses.

22. The council considers that it would be premature to re-designate or revise the status of any of the EDAs until the review is complete. I agree with the council that a comprehensive review is required, and that it is inappropriate to allocate or de-allocate economic development sites in advance of the review. However, in my judgement it is highly unsatisfactory that the review is not to take place until after the adoption of the local development plan; that is not the sequence envisaged by Scottish Ministers.

23. Paragraphs 101-103 of SPP are unequivocal on the matter:

*"Local development plans should allocate a range of sites for business, taking account of current market demand; location, size, quality and infrastructure requirements; whether sites are serviced or serviceable within five years; the potential for a mix of uses; their accessibility to transport networks by walking, cycling and public transport and their integration with and access to existing transport networks. The allocation of such sites should be informed by relevant economic strategies and business land audits in respect of land use classes 4, 5 and 6.*

*Business land audits should be undertaken regularly by local authorities to inform reviews of development plans, and updated more frequently if relevant. Business land audits should monitor the location, size, planning status, existing use, neighbouring land uses and any significant land use issues (e.g. underused, vacant, derelict) of sites within the existing business land supply.*

*New sites should be identified where existing sites no longer meet current needs and market expectations. Where existing business sites are underused, for example where there has been an increase in vacancy rates, reallocation to enable a wider range of viable business or alternative uses should be considered, taking careful account of the potential impacts on existing businesses on the site."*

24. From the above it is clear that Ministers expect the assessment of demand for and supply of economic development sites to be conducted as part of the preparation of the local development plan. This assessment is intended to consider a range of factors, including market demand, location, quality, infrastructure and servicing, the potential for mixed uses, and marketability. Councils should consider whether underused business sites should be reallocated.

25. On an issue which is as important as this it is insufficient to delay the review of economic development sites until some unspecified later date; the review needs to be conducted in advance of the issue of the local development plan in order to fulfil one of the basic requirements of SPP. Nor is it satisfactory to 'relegate' this pivotal issue to Supplementary Guidance. The 'amber' areas, where there may be scope for change, amount to over 770 hectares of employment land. Manifestly this is not a detailed matter to be fleshed out in Supplementary Guidance.

26. I consider that this inconsistency with Scottish Planning Policy amounts to a serious deficiency in the Proposed Plan. I am unable to resolve this through the examination process, as it requires the reappraisal of all the Economic Development Areas across the City. I therefore intend to recommend that an early review of the Plan be carried out to remedy the deficiency, in accordance with the advice contained in paragraph 123 of Circular 6/2013: Development Planning. (See also Issue 17: Meeting housing needs)

27. I have considered the individual objections from the Industrial Property Investment Fund, United Wholesale (Scotland) Ltd, Cathcart Developments Ltd, Royal Mail Group, Paradigm CB1, John Lewis and Christ's Hospital Foundation, which are summarised above by the council. Most of the objectors wish the sites concerned to be reallocated from economic development purposes to various alternative uses, notably housing, mixed use and commercial uses (leisure, restaurants, retail and hotels). Conversely Royal Mail Group seek the inclusion of their site within an adjacent EDA.

28. However, for the reasons given above I agree with the council that it would be premature to re-designate these sites until the review of existing industrial areas has been completed. It would be wrong to deal with the matter in a piecemeal fashion when there is insufficient knowledge of the overall requirement for economic development sites, and a lack of comparative evidence to enable an assessment of the best future use or uses of existing allocated sites.

29. The only exceptions could be where the council has already sanctioned a change of use of employment land to another distinct purpose, or has signalled its intention to do so.

30. In relation to the objection by Forge Properties LLP, although planning permission has been granted subject to a Section 75 agreement for a mixed use development on part of the EDA, I note that the application affects less than half of the area of the EDA, and over half of the application site would still be devoted to business units. I can see little purpose therefore in re-designating the land at this stage to reflect the boundary of the planning application.

31. With regard to the objection by Helical Bar (Cathcart) Ltd, the council is now well disposed towards a reduction to the designated EDA, having granted planning permission in principle for residential development on the northerly part. There is little purpose in retaining that area within the EDA designation, and I therefore propose to recommend that the Proposed Plan be modified accordingly.

32. Concerning the objections by Diageo Scotland Ltd and Chris Breslin, the situation has changed since the publication of the Proposed Plan. The council now advises that, following a charrette, a masterplan for a mix of uses will be prepared, to inform a Framework for Port Dundas which will become Supplementary Guidance to the Proposed Plan. Since the council has already decided to change the status of the site, I consider that this should be reflected in the Proposed Plan as the council now suggests.

33. The objection by Dandara Ltd points out that part of the site of the current planning application for a mixed use development at Cheapside Street lies within the EDA. In our discussion of Issue 33 we conclude that the proposed housing land supply allocation H057 should be extended to coincide with the boundary of the planning application site. Accordingly, I consider that the EDA boundary should be re-drawn to exclude the extended H057 site.

34. As there is no longer an extant planning permission for residential development at the Strathclyde Business Centre, I agree with the council that it would be premature to re-designate the site for residential purposes until the review of Economic Development Areas has been carried out.

#### Other Designations

35. The request by the University of Glasgow for the Garscube Campus to be identified as an Economic Development Area is well founded, in view of its critical role as a provider of higher education and employment at the veterinary school and associated research facilities. Having regard to policy CDP3's key objective to promote Glasgow as a learning city by supporting the growth of higher education institutions, I agree that the campus should be designated as an EDA.

36. There is no ability to remove part of the West of Scotland Science Park from the identified Strategic Economic Investment Location, as this designation was made in the Glasgow and Clyde Valley Strategic Development Plan, to which the Proposed Plan is required to conform.

#### Supporting representations

37. I note the representations in support of the Plan which are summarised above, but they do not raise any unresolved issues which I require to examine.

#### **Reporter's recommendations:**

Carry out an early review of the Proposed Plan to reappraise the Economic Development Areas throughout the City, in accordance with the advice contained in paragraph 123 of Circular 6/2013: Development Planning.

Modify policy CDP3 to incorporate a bullet point under "Promote economic growth by" which states "*supporting and encouraging existing employment-generating business and industry*".

Modify the context section on page 36 of the Proposed Plan, by adding the suggested text to the final bullet point to read "Better access to the internet, information technology *and an improved active travel and public transport network* for business and residents"

Modify the boundary of the Economic Development Area affecting the Scottish Power site at Cathcart to remove the application site reference 14/01770/DC, where planning permission has been granted in principle for residential development, from the designation.

Modify the Proposed Plan by removing the Economic Development Area designation at Port Dundas, but retain the masterplan designation shown on the Proposals Map.

Modify the Proposed Plan by excluding the extended site of the H057 housing land supply allocation from the adjoining Economic Development Area.

Modify the Proposed Plan to designate the Garscube Campus of the University of Glasgow as an Economic Development Area.

Issue 11	Network of Centres	
Development plan reference:	Policy CDP 4 Network of Centres (Pages 37-38)	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>ROCK DCM (00006) Kartar Singh Barhaya (00087) Muriel Pearson (00143) Bill Carson (00144) The Theatres Trust (00422) Southside Housing Association (00424) Sportscotland (00429) Gobafoss General Partner Ltd (00439) Buchanan Partnership (00451) Candleriggs Limited (00463) Hillhead Community Council (00479) Retail Property Holdings (RPH) (00491) Aldi Stores Ltd (00496) Whitbread plc (00500) Adam Bruce (00544) Allied Vehicles Limited (00545) Ediston Properties Ltd (00557) Lujo Properties Ltd (00564)</div> <div>Highland Properties Group (00567) Shawlands Retail Ltd (00568) Wm Morrison Supermarkets plc (00575) Great Western Unit Trust (00580) St Enoch Trustee Company Ltd (00597) Say No To Tesco In Scotland (00599) Pollokshields Community Council (00609) John Lewis (00630) Strathclyde Partnership for Transport (00633) Dennistoun Community Council (00634) George Capital LLP (00636) Dowanhill Hyndland and Kelvinside Community Council (00637) Asda Stores Limited (00642) West Dunbartonshire Council (00806) Scottish Property Federation (00818)</div>		
Provision of the development plan to which the issue relates:	Policy CDP 4 - Network of Centres is one of ten detailed policies in the Plan which contributes to meeting the requirement of the two overarching policies. Policy CDP 4 seeks to ensure that all of Glasgow’s residents have good access to a network of centres which are vibrant, multi functional and sustainable and which provide a range of goods and services.	
Planning authority’s summary of the representation(s):		
<u>City Centre - Boundaries and Functions</u>  <u>Objecting</u>  00451/2/001 Buchanan Partnership - The North Cutting (between Cathedral Street and the Buchanan Galleries Shopping Centre) was designated in City Plan 2 as part of the City Centre Principal Retail Area, but has been excluded from it on the LDP Policy and Proposals Map. The site is an integral part of the Buchanan Galleries Extension proposals and benefits from a Planning Permission in Principle for mixed use (retail and leisure) development. The site should be included in the Principal Retail Area.		

00463/1/001 Candleriggs Limited - The site bounded by Hutcheson Street/Trongate/Wilson Street and Candleriggs is shown on the Policy and Proposals Map as falling within the City Centre Principal Retail Area. The site is considered to be the missing piece of the jigsaw in the regeneration of the Merchant City. It is considered to be suitable for a variety of land uses and, in line with recent land use changes in the locale, should be re-designated as 'Mixed Use' in the CDP.

00564/3/001 Lujo Properties Ltd - The City Centre Principal Retail Area has changed over the last few years and the western end of Sauchiehall Street has become more of a focus for leisure and entertainment rather than retailing. The PRA boundary should be redrawn to include only the pedestrianised area of Sauchiehall Street and a more flexible policy should apply to the remaining part of Sauchiehall Street.

00597/1/001 St Enoch Trustee Company Ltd - Supports Policy CDP 4 and its strategy to promote development in the City Centre and other neighbouring Town Centres and to maintain and strengthen the role of Glasgow City Centre as the key economic driver in the West of Scotland. However, the policy could be more explicit to this effect.

#### Supporting

00479/20/001 Hillhead Community Council - Support for the intention to make the City Centre the main focus for shoppers.

00500/2/001 Whitbread plc - Support Policy CDP4 which supports the primary retail, office and leisure functions of the City Centre and favours proposals which supports the retail function and/or improves the quality and diversity of Glasgow's Major Town Centres. Future policies should promote flexibility in terms of uses within the City Centre to allow the market to respond to changing demand and occupier requirements.

00597/1/005 St Enoch Trustee Company Ltd - Supports the encouragement of non-retail Town Centre uses, such as leisure activity, within the City Centre and agree that this will enhance the attractiveness of the City Centre. Further detail is required on how support for the primary retail, office and leisure functions of the City Centre will be supported in practice. Note that this will be available through Supplementary Guidance in due course, and would welcome the opportunity to comment when published.

00597/1/006 St Enoch Trustee Company Ltd - Support policy CDP 4 which seeks to reinforce the network of centres by supporting the 'Town Centres First' principle and directing appropriate footfall generating uses to Town Centres. The scope of the policy, however, is not well defined in terms of, 'appropriate footfall generating uses' and guidance will be required to explain how this should be applied in practice. The Plan should look to direct all Town Centre footfall generating uses including office, education and civic uses to the City Centre first.

00636/10/001 George Capital LLP - Support policy CDP 4 as it promotes the City Centre as the primary location for retail office, education, commercial leisure, tourism and civic uses.

00636/10/002 George Capital LLP - Support the proposed City Centre Principal Retail Area and Strategic Economic Investment Area land use designations within the City Centre.

00806/5/001 West Dunbartonshire Council - Support for the priority given by the Plan to directing appropriate development towards the city centre and other town centres.

### Town Centres - Boundaries and Functions

#### Objecting

00479/2/001 Hillhead Community Council - The east side of Kersland St, adjacent to the lane, is currently identified as a stalled space within Town Centre. This site should be re-designated as Residential and removed from the Town Centre as there was a residential building on this site previously, with no history of commercial use.

00479/16/002 Hillhead Community Council - Do not support any increase in Entertainment businesses, hot food or carry out businesses or other restaurants. There is already an abundance of these, such that they are having an impact on the main retail area and the southern end of Byres Road.

00479/16/003 Hillhead Community Council - Do not support any increase in offices or agencies on Byres Road.

00479/21/001 Hillhead Community Council - Objects to the inclusion of Church Street triangle in the Partick/Byres Road Town Centre, and also to shops in Church Street and to any further entertainment uses at this location. There are already too many licensed/entertainment premises in the area

00479/30/002 Hillhead Community Council - Concerns regarding the management of use classes on Byres Road. There is pressure from supermarket chains and non-retail units eroding the distinct identity of the area and undermining small businesses. Desire for support to be provided for small, retail businesses within the area and non-retail units need to be discouraged.

00557/2/001 Ediston Properties Ltd - Robroyston Retail Park was identified as having the potential to be designated a town centre in City Plan 2 and in the MIR. The Robroyston Retail Park location, together with the ASDA and the adjoining commercial land, is the logical location for a town centre. The Community Growth Area will require further facilities and the CGA proposals include promoting town centre uses on the land immediately to the south of the Retail Park. The Plan should identify the opportunity for existing and proposed facilities to perform a town centre role for the enlarged Robroyston area.

00575/2/001 Wm Morrison Supermarkets plc - The Baillieston Morrisons store should be included within the Baillieston Local Town Centre. This store has been trading for several years and is well established within its community. It provides a key retail function and as such, should be identified in the Local Development Plan and given town centre of other protected status.

00575/2/002 Wm Morrison Supermarkets plc - The Gallowgate Morrisons store should be included within the Barras Local Town Centre. This store has been trading for several years and is well established within its community. It provides a key retail function and as such, should be identified in the Local Development Plan and given town centre of other protected status.

00575/2/003 Wm Morrison Supermarkets plc - The Crossmyloof Morrisons store should be identified in the Local Development Plan as another retail and commercial leisure designation. This store has been trading for several years and is well established within its community. It provides a key retail function and as such, should be identified in the Local Development Plan and given town centre of other protected status.

00575/2/004 Wm Morrison Supermarkets plc - The Newlands Morrisons store should be included within the Shawlands Town Centre. This store has been trading for several years and is well established within its community. It provides a key retail function and as such, should be identified in the Local Development Plan and given town centre of other protected status.

00575/2/005 Wm Morrison Supermarkets plc - The Cardonald Morrisons store should be included within the Cardonald Local Town Centre. This store has been trading for several years and is well established within its community. It provides a key retail function and as such, should be identified in the Local Development Plan and given town centre of other protected status.

00580/1/001 Great Western Unit Trust - The Plan should deal more creatively with the relationship between Great Western Retail Park and Drumchapel town centre in the same sort of way it has at Easterhouse/Glasgow Fort and Pollok/Silverburn by linking together the "traditional" local centre (which will never again function as originally intended) and an adjacent commercial centre, to the benefit of both.

00642/2/001 Asda Stores Limited - Whilst a Robroyston Town Centre Masterplan Brief has been prepared, no Masterplan has been prepared and, on this basis, the Council consider it premature to designate a Robroyston town centre in the Plan. The population of this area will increase significantly over the plan period and this increased population must be served by adequate infrastructure. A new town centre is considered the most appropriate way to meet this prospective demand and would be in-keeping with SPP. As a result, it is not considered premature.

### Supporting

00479/16/001 Hillhead Community Council - Supports the retention of the City Plan 2 policy position that 80% of the units on Byres Road should be in retail use.

00479/19/001 Hillhead Community Council - Supports the intention to refuse permission for further large superstores, wherever situated, as they undermine small businesses which keep money in the area, give diversity and sense of place to a district.

00491/3/001 Retail Property Holdings (RPH) - Supports the aims of the policy and also the means identified to achieve the aims, particularly the town centres first approach and building on the strengths of each centre.

00491/8/001 Retail Property Holdings (RPH) - RPH support the identification of Pollok as a Major Town Centre.

00496/1/002 Aldi Stores Ltd - Note that policy CDP 4 specifically addresses the Council's approach to protecting town and local centre areas and assume that the approach to considering other locations for retail development will be set within the supplementary guidance (SG) and that this will accord with national policy within SPP. Aldi support the



approach to protecting town centres set out as it recognises the importance of ensuring the availability of a mix of services and a retail offer in local areas so that all local residents have convenient access to such facilities.

00599/1/001 Say No To Tesco In Scotland - Support the CDP aim to make the city a sustainable place, in particular through a 'town centre first' approach (CDP, p.21), which is beneficial in meeting the needs of the local inhabitants and businesses by strengthening the capacity of the area to "provide a range of shops, community facilities and services". In relation to Class 1 retail spaces, we are in favour of a diversity of food businesses, so that low carbon and biodiverse food options have a real place on our high streets.

00633/13/001 Strathclyde Partnership for Transport - Support the aims seeking to maintain and strengthen Glasgow City Centre and use the 'town centre first' approach, as this will provide services and employment opportunities in locations which are accessible by a variety of transport modes.

00633/13/003 Strathclyde Partnership for Transport - The identification of the role that town centres play as integrated transport hubs and encouraging travel by sustainable means is welcomed.

00637/10/001 Dowanhill Hyndland and Kelvinside Community Council - Support having no new Superstores outwith Town Centres.

00642/1/001 Asda Stores Limited - Supports the network of centres as being in line with Scottish Planning Policy and also the 'assessment of development proposals' section, which acknowledges the sequential approach that should be taken whilst at the same time acknowledging the important contribution that each type of centre brings.

### Commercial Centres

#### Objecting

00144/2/001 Bill Carson - A change in policy sought at Auldhouse Retail Park, which is subject to a bulky Goods restriction, on the grounds that the Park has seen a number of businesses fold, many people made unemployed and is in danger of becoming totally redundant.

00439/1/001 Gobafoss General Partner Ltd - Auldhouse Retail Park is currently identified in Glasgow City Plan 2 (GCP2) as an 'other retail and commercial centre'. Policy CDP4 states that the role and function of other retail and commercial centres will be set out in Supplementary Guidance (SG). The permitted trading format for the Retail Park constitutes some units with no restriction, others which are non food goods only and the remainder as non food retail. In the production of SG, it is important that the role and function of Auldhouse is informed by its actual planning status and that it is not designated a bulky goods retail park.

00557/3/001 Ediston Properties Ltd - The Plan should be clear about the role of centres in the network. It is not appropriate to simply restrict Other Retail and Commercial Leisure Centres to bulky goods retailing. In this regard, it is considered that Robroyston Retail Park is not just a location for bulky goods and this should be reflected in the LDP. Recognition should be given to the retail park's location being central to the existing and developing Robroyston community.

Out of Centre Designations and ProposalsObjecting

00006/2/001 ROCK DCM - Promotion of the Glasgow Green/Barras area as a combined Urban Events and Market Zone. This would have major urban regeneration benefits for the Glasgow Cross/Calton areas and the wider East City Centre.

00597/1/002 St Enoch Trustee Company Ltd - To protect investment and future retailer demand in Glasgow City Centre, the Council must take a proactive and firm stance against out of town development. To do this, the Council should consider including a 'presumption against out of town development' in the City Plan.

00630/1/004 John Lewis - A Retail Impact Assessment should be required where new proposals are out with a defined Town Centre in order to demonstrate that there will be no threat to the vitality and viability of the City Centre or other Town Centres. A floor space threshold could be set by the Council to assist with the implementation of this policy. A Retail Impact Assessment could also be requested for certain types of proposals within a Town Centre, where they could be considered to have an impact on the centre's vitality and viability.

Technical GuidanceObjecting

00087/6/001 Kartar Singh Barhaya - Carbon filter systems should be accepted as a means of extracting odours and fumes from hot food takeaways and restaurants.

00087/6/002 Kartar Singh Barhaya - If Greggs Bakery, Subway and other similar takeaways are using concealed units, like pizza ovens, then why do people need planning permission for microwave ovens? Bakeries and outlets like Subway do not need planning permission for microwave ovens and concealed units.

00087/6/003 Kartar Singh Barhaya - Internal flues should be accepted as a means of extracting odours and fumes from hot food takeaways and restaurants where a suitably qualified person has confirmed that the proposed system will satisfy the design and performance requirements of the Planning Authority. Planning Officers should not ask anything about heating and ventilation when officers are in the position to put the condition on planning permission.

00087/6/005 Kartar Singh Barhaya - If satellite dish are not detrimental to the residential amenity, then why are external flues for hot food takeaways considered detrimental to the residential amenity?

00087/6/006 Kartar Singh Barhaya - Objections from the Roads Department to hot food takeaways on the basis of parking considerations should not be allowed - it is the job of traffic wardens to stop illegal parking.

00143/4/001 Muriel Pearson - Improved public transport connection must not only connect local, major and city centre but must connect the peripheral schemes such as Ruchazie to Duke Street and Parkhead. Better access to local shops is also required.

00429/12/001 Sportscotland - In relation to sports uses, and uses like schools, which contain sports facilities, we are concerned that requiring these to be located in town centres could compromise their extent, e.g. a school with associated pitches takes up a reasonable area of land, a school with no outside sports space won't, and we suggest that schools need these outdoor sports areas. The published SPP reflects this issue.

00479/16/004 Hillhead Community Council - Have concerns over the adaptation of existing office class use shops for betting shops and similar businesses, which can result in social problems. Can any policy address this?

00479/16/005 Hillhead Community Council - LES does not refer to Planning when issuing licences for pavement use and there are examples where planning consent is refused but a licence is issued. This should be resolved and planning decisions should have primacy.

00479/16/006 Hillhead Community Council - The issues surrounding deliveries to units on Byres Road should be a greater consideration in determining planning applications. Delivery vehicles can often give rise to safety issues in residential streets and narrow lanes and amenity issues related to antisocial delivery hours.

00479/16/007 Hillhead Community Council - Greater attention needs to be given to dealing with and storing refuse from shops on Byres Road.

00479/16/008 Hillhead Community Council - The proposals for the Business Improvement District development of Byres Road should be discussed in full with surrounding communities, as well as shops, before being included in the Plan.

00479/18/001 Hillhead Community Council - If the proposed Glasgow Harbour Superstore is to go ahead the planning permission should be conditioned to ensure there is no increase in traffic levels (and associated problems of air and noise pollution, etc.) on Byres Road and Dumbarton Road.

00479/18/002 Hillhead Community Council - Concerns regarding the amount of vehicular traffic moving around town centres, such as Byres Road. The Plan should make provision to encourage the use of public transport where possible and improve accessibility. Delivery arrangements for new businesses in the area should be carefully considered so as not to result in congestion, dangerous traffic situations or the increased use of residential streets by servicing vehicles.

00544/1/001 Adam Bruce - Seeks a change of allocation of two areas of land in close proximity to each other at London Road, both within the urban area. The westernmost site should be reallocated to Other Retail and Commercial to accurately reflect the established commercial use. The open space designation should be removed from the easternmost site and it should also be allocated as Other Retail and Commercial for the potential expansion of the established commercial uses to the south.

00597/1/003 St Enoch Trustee Company Ltd - Policy CDP4 refers to 'Other Retail and Commercial Leisure Centres' as locations for trading formats that cannot be easily accommodated in a Town Centre, but should specify which 'trading formats' cannot be accommodated in the Town Centre and clarify the role and function of Other Retail and Commercial Leisure Centres. Such locations should only be considered where a proposed development cannot be accommodated within a Town Centre, or possibly on a suitable site at the edge of an identified Town Centre. The Plan needs to clarify what is

considered 'complementary to' and what could 'undermine' a Town Centre and how this would be tested.

00609/4/001 Pollokshields Community Council - Seek to ensure that the Plan does not support retail use only on a site at Maxwell Rd, as proposed by SGN. A mix of uses, compatible, with the generally residential use of the area would be preferable and would have less of an impact on local retailers or traffic flows.

00630/1/001 John Lewis - Policy CDP 4 states that Glasgow City Centre should be the, "Primary location for retail, office, education, commercial leisure, tourism and civic uses serving the city region as well as a national transport hub".

The contributor strongly supports the Council's strategy to promote development in the City Centre and other neighbouring Town Centres but considers that it may be appropriate to clarify which areas are the preferred location for major retail developments and other Town Centre uses, making reference to the City Centre Principal Retail Area which is shown on the draft Proposals Map.

The policy should explicitly state that all development appropriate to Town Centres should be located in accordance with this hierarchy and the sequential approach, and that larger scale proposals should locate in the City Centre and higher order Town Centres in preference. The policy also does not provide an indication of the instances that proposals for edge of centre developments will be supported, if at all. We consider that this requires further clarification in the Plan.

00630/1/002 John Lewis - The contributor strongly supports Policy CDP 4's aim to achieve vibrant town centres by directing appropriate footfall generating uses to Town Centres in line with the 'Town Centres First' principle. However this policy is not well defined in terms of 'appropriate footfall generating uses' and guidance will be required to explain how this should be applied in practice and what uses it will apply to. The Plan should look to direct all Town Centre appropriate uses including office, education and civic uses to the City Centre first.

00630/1/005 John Lewis - The definition of 'complementary to' and what could 'undermine' the Town Centres requires greater clarification. It is not defined what type of development would be considered to undermine the Town Centre and how this would be tested.

00633/13/002 Strathclyde Partnership for Transport - Public transport connections between neighbourhoods and local town centres are essential. The Plan should recognise that active travel is not an option for all residents for all of their short journeys and access by different travel modes is key to the success of local centres.

00633/13/004 Strathclyde Partnership for Transport - Whilst welcoming the support for improved connections between centres, the mechanisms for the delivery for such improvements must be considered as this is unlikely to be achieved through developer contributions alone.

00634/2/004 Dennistoun Community Council - The Plan should become a driver in enabling spaces that have traditionally been used as shops (or similar Class 2 use) to be appropriated for alternative and creative uses in a way that has a long term positive outcome for communities such as Dennistoun. Temporary micro-businesses should be encouraged to take up space in empty commercial units on affordable, short lets: e.g.

Young Enterprise initiatives from local schools, or business projects connected to local universities/colleges/art schools - including work within the cultural and creative industries.

#### Supporting

00422/1/001 The Theatres Trust - Support for the protection and revitalisation of town centres and the integration of community, leisure, entertainment and recreation facilities. It will encourage a mix of uses such as restaurants, bars, cinemas and theatres which support the vibrancy, vitality and viability of town centres throughout the day and into the evening. A successful evening economy improves the image of the area to visitors as an attractive destination and improves the quality of life for residents.

00545/2/002 Allied Vehicles Limited - Supports commitment to the renewal of Possilpark.

00633/13/005 Strathclyde Partnership for Transport - Support the requirement for significant new housing developments to include provision for new Local Shopping Facilities where any part of the development is more than 800 metres walking distance from existing Centres. This will reduce the need to travel and encourage walking and cycling trips for everyday shopping needs.

#### Retail Applications Assessment Criteria

#### Objecting

00087/6/004 Kartar Singh Barhaya - The Plan should not state that shop units will have to lie vacant for 18 months before a hot food application will be considered. Sometimes a shop is vacant for many years and then somebody will buy it; the 18 month vacant period should not apply to them.

00087/6/007 Kartar Singh Barhaya - The 20% limit on Hot Food Takeaway Coffee/Tea, Restaurants, Pubs in any one street frontage should be changed - hot food takeaways should be calculated separately from pubs and other uses.

00424/1/002 Southside Housing Association - Objection to the former Gas Works site on Maxwell Road in Pollokshields being rezoned to retail.

00545/2/001 Allied Vehicles Limited - Possilpark was identified within the Main Issues Report as the subject of a Town Centre Renewal Programme (Map 3, Note 38 of the MIR). As part of any credible renewal strategy, an anchor supermarket/small superstore will be required. Land currently occupied by Allied Vehicles has potential to accommodate such a store and deliver connectivity with the existing defined town centre. The Proposed Plan should not avoid setting out clear criteria for the assessment of such proposals.

00568/1/001 Shawlands Retail Ltd - For a variety of reasons, premises in the Shawlands Arcade are not lettable to retailers at even an extremely low rent. The restrictive policy that 70%-80% of the centre will be retained in retail use is now clearly no longer realistic and a more flexible approach is required which allows for a greater presence of other town centre uses within the Arcade.

00597/1/004 St Enoch Trustee Company Ltd - Policy CDP 4 should be amended to refer to the need for a Retail Impact Assessment to assess the impact of out of centre

proposals on the vitality and viability of existing Centres. It may also be appropriate to require an assessment of the impact of certain types of proposals within a Town Centre, where they may have an impact on the centres vitality and viability. A floorspace threshold could be set by the Council to assist with the implementation of this policy.

00630/1/003 John Lewis - Policy CDP4 does not specify which 'trading formats' cannot be accommodated in the Town Centre and are directed to 'Other Retail and Commercial leisure Centres.' Policy should explicitly state that 'other retail and commercial leisure centres' will only be considered where the proposed development has demonstrated, in line with the sequential approach for retail and commercial leisure developments, that it cannot be accommodated within a Town Centre, or possibly on a suitable site at the edge of an identified Town Centre.

00634/2/002 Dennistoun Community Council - In responding to the GCC Gambling Policy Statement in 2013 DCC posited the view that an 'overprovision policy' be effected to ensure that disadvantaged communities have some support in resisting plans for increasing the number of betting shops in a given area.

The recent proliferation of pawn shops, money lenders and pay-day loan companies adds a further strain on long term community resilience.

#### Supporting

00479/20/002 Hillhead Community Council - Supports the retention of the City Plan 2 policy position that 80% of the units on Byres Road should be in retail use.

00496/1/003 Aldi Stores Ltd - Keen to ensure that the particularities of the Limited Assortment Discount (LAD) model, and its relevance when applying the sequential test, is recognised within the emerging SG. It is also important that the SG is based upon up to date evidence and information on latest retailing trends to ensure its policies are fit for purpose.

00575/1/001 Wm Morrison Supermarkets plc - Supports the decision not to introduce a moratorium on new superstore development.

00642/3/001 Asda Stores Limited - Support for the Plans position that new retail proposals should be assessed on their own merits, through a policy framework which is consistent with national planning policy/guidance and which emphasises the assessment of impact and the sequential approach.

#### Planning Studies/Town Centre Reviews

#### Objecting

00567/1/001 Highland Properties Group - We believe that a residential allocation for this site will meet the aims and objectives of the development plan by:

- Ensuring sufficient new housing land is available allowing for a phased approach to the release of housing land and provides alternatives should existing allocations and 'non-effective sites' slow or fail to deliver.
- Meeting the economic prosperity and environmental quality strategic objectives.
- Locating development which minimises number and length of car journeys by

providing new homes adjacent to a major transport corridor.

00634/2/001 Dennistoun Community Council - The Plan states that "the Council has conducted a review of the changing balance of land use within each town centre". Findings from this review should be outlined in the City Development Plan, along with an overview of 'premises use' as well as 'land use'. If the review did not consider town centres in such detail then it is suggested that further work is undertaken in this area.

00634/2/003 Dennistoun Community Council - Little focus is given to decline in Dennistoun's commercial and retail elements. There was a focus on Duke Street/Sword Street in City Plan 1, but not in City Plan 2 (adopted December 2009) on the basis that there would be a positive knock-on effect from the proposed development further up Duke Street (near High Street). If that 'approach' is still the basis for current strategy then it is suggested that this is no longer credible and that the approved City Development Plan includes a significant focus on improving the health, vibrancy and sustainability of Dennistoun as a Local Town Centre.

#### Supporting

00479/20/003 Hillhead Community Council - Support health checks on town centres.

00491/9/001 Retail Property Holdings (RPH) - Supports Actions 23, 28 and 103 and would welcome an opportunity to fully engage in the consultation processes for the preparation of the Pollok Local Development Framework (Actions 23 and 103) and the Town Centres Review and New Town Centres Action Plans (Action 28).

00575/1/002 Wm Morrison Supermarkets plc - Supports the decision to carry out a review of the City's retailing centres to inform the management of the Network of Centres.

#### General Comment

#### Objecting

00479/56/001 Hillhead Community Council - Do not support any expansion of pay and display bays in our area (Hillhead) which will encourage further commuting by car and cause problems for our residents.

00818/4/004 Scottish Property Federation - Concern that secondary areas of market activity, such as areas of Sauchiehall Street and Argyle Street, will continue to struggle to compete for major occupiers against the prime locations. The council should adopt flexible planning policies that support alternative uses in areas that are challenged for major investment and occupation.

#### **Modifications sought by those submitting representations:**

#### City Centre - Boundaries and Functions

00451/2/001 Buchanan Partnership - Change boundary of principal retail area at Cathedral Street Bridge/Buchanan Galleries to include site known as 'North Cutting' within the Principal Retail Area.

00463/1/001 Candleriggs Limited - The site bounded by Hutcheson Street/Trongate/Wilson Street and Candleriggs should be re-designated from Principal Retail Area to 'Mixed Use'.

00564/3/001 Lujo Properties Ltd - The City Centre Principal Retail Area boundary should be redrawn to include only the pedestrianised area of Sauchiehall Street and a more flexible policy should apply to the remaining part of Sauchiehall Street.

00597/1/001 St Enoch Trustee Company Ltd - Amend policy CDP to: state that all development appropriate to Town Centres should be located in accordance with the Town Centre hierarchy and sequential approach; state that larger scale proposals should locate in the City Centre and higher order Town Centres as a preference; and provide greater clarity on the acceptability or definition of proposed developments in edge of centre locations.

#### Town Centres - Boundaries and Functions

00479/2/001 Hillhead Community Council - The site on the east side of Kersland St, adjacent to the lane, is currently identified as a stalled space within Town Centre. This site should be re-designated as Residential and removed from the Town Centre.

00479/16/002 Hillhead Community Council - The Plan should not support any increase in Entertainment businesses, hot food or carry out businesses or other restaurants on Byres Road.

00479/16/003 Hillhead Community Council - The Plan should not support any increase in offices or agencies on Byres Road.

00479/21/001 Hillhead Community Council - Amend Policy and Proposals Map to omit Church Street Triangle from the Partick/Byres Road Town Centre.

00479/30/002 Hillhead Community Council - The Plan should include policy to manage pressure from, and discourage, non-retail uses on Byres Road.

00557/2/001 Ediston Properties Ltd - The Plan should identify Robroyston Retail Park and surrounding town centre uses, existing and proposed, as providing an opportunity to perform a 'town centre' role for the enlarged Robroyston area.

00575/2/001 Wm Morrison Supermarkets plc - The Baillieston Morrisons store should be included within the Baillieston Local Town Centre.

00575/2/002 Wm Morrison Supermarkets plc - The Gallowgate Morrisons store should be included within the Barras Local Town Centre.

00575/2/003 Wm Morrison Supermarkets plc - The Crossmyloof Morrisons store should be identified in the Local Development Plan as another retail and commercial leisure designation.

00575/2/004 Wm Morrison Supermarkets plc - The Newlands Morrisons store should be included within the Shawlands Town Centre.



00575/2/005 Wm Morrison Supermarkets plc - The Cardonald Morrisons store should be included within the Cardonald Local Town Centre.

00580/1/001 Great Western Unit Trust - At page 37, within the section headed 'Aims', insert an additional bullet point after current bullet point two as follows: 'review opportunities which may exist for creating a policy relationship between existing centres of all types if such relationships would be to the benefit of both centres'.

00637/10/001 Dowanhill Hyndland and Kelvinside Community Council - The Plan should state that there will be no new Superstores outwith Town Centres.

00642/2/001 Asda Stores Limited - Designate a new Town Centre at Robroyston.

### Commercial Centres

00144/2/001 Bill Carson - A removal of the bulky goods restriction at Auldhouse Retail Park.

00439/1/001 Gobafoss General Partner Ltd - The consented role and function of Auldhouse Retail Park needs to be properly considered in the production of Supplementary Guidance.

00557/3/001 Ediston Properties Ltd - The LDP should not seek to restrict the range of goods at Robroyston Retail Park to bulky goods and should identify the centre having a wider role and providing a wider range of retail and leisure facilities to the surrounding area.

### Out of Centre Designations and Proposals

00006/2/001 ROCK DCM - The Plan should promote the Glasgow Green/Barras area as a combined Urban Events and Market Zone.

00597/1/002 St Enoch Trustee Company Ltd - Consider including a 'presumption against out of town development' in the Plan.

00630/1/004 John Lewis - A Retail Impact Assessment should be required where new proposals are out with a defined Town Centre in order to demonstrate that there will be no threat to the vitality and viability of the City Centre or other Town Centres. A floor space threshold could be set by the Council to assist with the implementation of this policy. A Retail Impact Assessment could also be requested for certain types of proposals within a Town Centre, where they could be considered to have an impact on the centre's vitality and viability.

### Technical Guidance

00087/6/001 Kartar Singh Barhaya - The Plan should state that carbon filter systems are an acceptable means of extracting odours and fumes from hot food takeaways and restaurants.

00087/6/002 Kartar Singh Barhaya - The Plan should state that planning permission should not be required for microwave ovens and concealed units in hot food takeaways.

00087/6/003 Kartar Singh Barhaya - The Plan should state that internal flues should be accepted as a means of extracting odours and fumes from hot food takeaways and restaurants where a suitably qualified person has confirmed that the proposed system will satisfy the design and performance requirements of the Planning Authority.

00087/6/005 Kartar Singh Barhaya - The Plan should not consider external flues for hot food takeaways as detrimental to residential amenity.

00087/6/006 Kartar Singh Barhaya - Objections from the Roads Department to hot food takeaways on the basis of parking considerations should not be considered in determining planning applications for hot food takeaways.

00143/4/001 Muriel Pearson - The Plan should promote improved public transport connections between local and major centres and the city centre and also between peripheral schemes and major centres, as well as better access to local shops.

00429/12/001 Sportscotland - Amend policy CDP4 text to recognise that uses such as playing pitches and schools have space requirements that may not be able to be met in centres without compromising their function. As an alternative, use the wording from the published SPP (para 68) which reflects this.

00479/16/004 Hillhead Community Council - The Plan should, if possible, state that it does not support the adaptation of existing office class use shops for betting shops and similar businesses.

00479/16/005 Hillhead Community Council - Planning decisions on use of the pavement should have primacy over licensing decisions.

00479/16/006 Hillhead Community Council - The Plan should include policy to deal with the issues surrounding deliveries to units on Byres Road.

00479/16/007 Hillhead Community Council - The Plan should give greater attention to dealing with and storing refuse from shops on Byres Road.

00479/16/008 Hillhead Community Council - The proposals for the Business Improvement District development of Byres Road should be discussed in full with surrounding communities, as well as shops, before being included in the Plan.

00479/18/001 Hillhead Community Council - If the proposed Glasgow Harbour Superstore is to go ahead the planning permission should be conditioned to ensure there is no increase in traffic levels (and associated problems of air and noise pollution, etc) on Byres Road and Dumbarton Road.

00479/18/002 Hillhead Community Council - The Plan should make provision to encourage the use of public transport where possible and improve accessibility. Delivery arrangements for new businesses in the area should be carefully considered.

00544/1/001 Adam Bruce - Designate two areas of land at London Road as Other Retail and Commercial. Remove the open space designation from the easternmost of these sites.

00597/1/003 St Enoch Trustee Company Ltd - Amend Policy CDP4 to: specify which 'trading formats' cannot be accommodated in Town Centres; clarify the role and function of Other Retail and Commercial Leisure Centres; state that Other Retail and Commercial Leisure Centres should only be considered where a proposed development cannot be accommodated within a Town Centre, or suitable edge Centre site; and clarify what is considered 'complementary to' and what could 'undermine' a Town Centre and how this would be tested.

00609/4/001 Pollokshields Community Council - Seek a mixed use designation on the SGN site on Maxwell Drive.

00630/1/001 John Lewis - Clarify which areas are the preferred location for major retail developments and other Town Centre uses, making reference to the City Centre Principal Retail Area which is shown on the draft Proposals Map.

Policy should explicitly state that all development appropriate to Town Centres should be located in accordance with this hierarchy and the sequential approach, and that larger scale proposals should locate in the City Centre and higher order Town Centres in preference. The policy should provide an indication of the instances that proposals for edge of centre developments will be supported, if at all.

00630/1/002 John Lewis - The Plan should look to direct all Town Centre appropriate uses including office, education and civic uses to the City Centre first.

00630/1/005 John Lewis - The Plan should define 'complementary to' and 'undermine' in relation to Town Centres, and clarify how a development would be tested to ensure it does not undermine a Town Centre.

00633/13/002 Strathclyde Partnership for Transport - The Plan should recognise that active travel is not an option for all residents for all their short journeys and access by different travel modes, including public transport, is key to the success of local centres.

00633/13/004 Strathclyde Partnership for Transport - The Plan should clarify how improved connections between centres are to be delivered.

00634/2/004 Dennistoun Community Council - The Plan should provide for empty units that have traditionally been used as shops to be used for alternative uses, such as temporary micro-businesses on affordable, short lets, including work within the cultural and creative industries.

#### Retail Applications Assessment Criteria

00087/6/004 Kartar Singh Barhaya - The Plan should not state that shop units will have to lie vacant for 18 months before a hot food application will be considered.

00087/6/007 Kartar Singh Barhaya - The 20% limit on Hot Food Takeaway Coffee/Tea, Restaurants, Pubs in any one street frontage should be changed - hot food takeaways should be calculated separately from pubs and other uses.

00424/1/002 Southside Housing Association - The former Gas Works on Maxwell Road should not be designated for retail.

00545/2/001 Allied Vehicles Limited - Amend section on the "Assessment of Development Proposals" (Page 38) to contain more explicit criteria in relation to the Assessment of Development Proposals outwith Town Centres.

00568/1/001 Shawlands Retail Ltd - Policy CDP4 should be modified to remove or reduce the 70% minimum threshold for class 1 retail uses within Shawlands town centre.

00597/1/004 St Enoch Trustee Company Ltd - Amend Policy CDP4 to make explicit reference to the need for a Retail Impact Assessment where the proposals are outwith a defined Town Centre to demonstrate that there will be no threat to the vitality and viability of the City Centre or other Town Centres. Consider the requirement for a form of retail assessment for certain types of proposals within a Town Centre, where they may have an impact on the centres vitality and viability. Set a floorspace threshold to assist with the implementation of this policy.

00630/1/003 John Lewis - Policy CDP4 should include the following text 'other retail and commercial leisure centres will only be considered where the proposed development has demonstrated, in line with the sequential approach for retail and commercial leisure developments, that it cannot be accommodated within a Town Centre, or possibly on a suitable site at the edge of an identified Town Centre'.

00634/2/002 Dennistoun Community Council - The Plan should include an 'overprovision policy' be effected to ensure that disadvantaged communities have some support in resisting plans for increasing the number of betting shops in a given area.

#### Planning Studies/Town Centre Reviews

00567/1/001 Highland Properties Group - Request that the site is identified as suitable for development within the context of policy CPD10 Meeting Housing Needs.

00634/2/001 Dennistoun Community Council - Findings from the review of land use in town centres should be outlined in the City Development Plan, including an overview of 'premises use' as well as 'land use'.

00634/2/003 Dennistoun Community Council - The Plan should include a significant focus on improving the health, vibrancy and sustainability of Dennistoun as a Local Town Centre.

#### General Comment

00479/56/001 Hillhead Community Council - The Plan should not support any expansion of pay and display bays in Hillhead.

00818/4/004 Scottish Property Federation - The Plan should take a flexible approach to the sorts of uses that will be supported in areas of the City Centre that are less attractive for major investment and occupation.

#### **Summary of responses (including reasons) by planning authority:**

##### City Centre - Boundaries and Functions

##### Objecting

00451/2/001 Buchanan Partnership - The element of the North cutting to the North of Cathedral Street has been omitted from the Principal Retail Area in the Policy and Proposals Map due to a mapping error.

The Council therefore has no objection to its inclusion if the Reporter is so minded.

The Reporter could, if so minded, amend the Principle Retail Area to include the element of the North cutting to the North of Cathedral Street.

00463/1/001 Candleriggs Limited - The site is currently the subject of a planning application (15/00457/DC) (OC100) for a mixed use development. There is no 'Mixed Use' designation in the Proposed City Development Plan, which is a change from the adopted City Plan and reflects the overarching Placemaking Principle that covers the entire city. The Council considers that the Principal Retail Area designation does not prevent the mixed use development of the site. Therefore no change is recommended. However, this response should be read in conjunction with the response to reference 00564/3/001 which follows.

No modification recommended.

00564/3/001 Lujo Properties Ltd – This objection relates to the Principal Retail Area as identified in the Plan and objects to a perceived restriction upon non Class 1 uses within the Area. However, the Plan does not provide clarification of what the assessment position would be regarding the Principal Retail Area as this is intended to be provided in the corresponding supplementary guidance for Policy CDP4. The current City Plan 2, Policy SC 10 page 201 states that within the Principal Retail Area “proposals will be assessed having regard to the maintenance of a range of shopping and retail facilities”. Therefore it seeks to ensure a range of Class 1 uses exists but does not preclude other uses being approved, provided the range of Class 1 uses is maintained. It is intended to maintain this position in respect of the Principal Retail Area in supplementary guidance once it is published. It appears that the objector has confused the Primary Retail Streets restriction which also appears in City Plan 2 which does seek to maintain a continuous retail frontage within its designation (including Sauchiehall Street).

The Network of Centres Background Paper sets out the Council's intention to relax the Primary Retail Streets designation to align with the pedestrianised area on Sauchiehall Street but that this would be set out in Supplementary Guidance.

On this basis it is considered that the intention behind the modification being sought would be achieved through the supplementary guidance designation of Primary Retail Streets (subject to public consultation and approval). Therefore it is not proposed to modify the coverage of the Principal Retail Area as this would not deliver the change being sought. However, the objection does illustrate that it might be more helpful to alter the title of the Principal Retail Area to better reflect its intention and the range of uses that exist within the Area. Therefore the Council would suggest altering the title of the Principal Retail Area to Principal Retail and Commercial Area.

The Reporter could, if so minded, change all references to Principal Retail Area in the Policy and the Policy and Proposals Map to Principal Retail and Commercial Area.

00597/1/001 St Enoch Trustee Company Ltd - The Plan contains policies that operate at a strategic, City wide level. The modifications sought involve Centre specific policies that

will be incorporated within a suite of Supplementary Guidance that will accompany the Plan. This Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption.

No modifications recommended.

### Town Centres - Boundaries and Functions

#### Objecting

00479/2/001 Hillhead Community Council - It is considered that the character of the site more closely resembles the residential street to the south than the Town Centre to the North. Therefore removing the site from the Town Centre designation would reflect the nature of the space and not alter the aims of the Policy. There is no residential designation in the Plan, therefore, the site would be undesignated but covered by the Placemaking Principle that covers the entire city.

The Reporter could, if so minded, modify the Town Centre boundary as proposed but leave the site undesignated.

00479/16/002, 00479/16/003 Hillhead Community Council - The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan. Supplementary Guidance will set out an appropriate balance between shopping and non-shopping uses for each of the City's Town Centres taking account of Scottish Planning Policy (CE2). No modifications recommended.

No modifications recommended.

00479/19/001 Hillhead Community Council - The preferred location of Town Centre uses, including superstores, will be set out in Supplementary Guidance and will be based on the sequential approach as set out in Scottish Planning Policy (SPP) (CE2 para.68). The LDP Main Issues Report identified no further development of new superstores as a preferred option however it is now considered that this approach would not be consistent with paragraphs 70-73 of the SPP.

No modifications recommended.

00479/21/001 Hillhead Community Council - It is considered that Major Town Centre is the appropriate designation for this location in view of the mix of uses in the area. In addition the planned redevelopment of the adjacent Western Infirmary Hospital by Glasgow University is likely to enhance the strategic importance of the Church Street Triangle within the Town Centre.

No modifications recommended.

00479/30/002 Hillhead Community Council – The Plan sets out the broad parameters in terms of the different types of town centres in the City. Detailed criteria for assessing development proposals within each town centre will appear in Supplementary Guidance. The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary

Guidance that will accompany the Plan. This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption.

No modification recommended.

00557/2/001 Ediston Properties Ltd - The Plan contains policies that operate at a City wide level. Supplementary Guidance will however identify an opportunity to create a Town Centre thereby maintaining the current City Plan position. This response should be read in conjunction with the response to comment 642/2/001.

No modifications recommended.

00575/2/001 Wm Morrison Supermarkets plc - This store is currently within an area designated as an Other Retail and Commercial Leisure Centre that also includes a convenience store, takeaway, restaurant and petrol station. This area is currently separated from the town centre by an area of Greenspace. In view of the range of uses in the area the Council considers that it could be included within the town centre along with the area of Greenspace. This would not alter the status of the Greenspace or the protection afforded to it in the PAN 65 map but would reflect the broader nature of uses within town centres which is being promoted by the Policy.

The Reporter could, if so minded, extend the Town centre boundary to include the Morrisons store that is adjacent to the Centre as well as the strip of Greenspace in-between the existing centre and the Other Retail and Commercial Leisure Centre designation.

00575/2/002 Wm Morrison Supermarkets plc - If the Reporter is so minded the Barras Town centre boundary could be amended to include The Morrisons store that is adjacent to the Centre has been constructed since the Adoption of City Plan 2. Its inclusion within the Town Centre boundary would reflect its nature as a town centre use and would be consistent with the Policy and Plan Strategy.

The Reporter could, if so minded, amend the Barras Town centre boundary to include the Morrisons store that is adjacent to the Centre as shown in the site plan.

00575/2/003 Wm Morrison Supermarkets plc – It is considered that designating the site as an Other Retail and Commercial Location would be consistent with the designation of the stand-alone store at Newlands (00575/2/004) on the City Development Plan Policy and Proposals Map.

The Reporter could, if so minded, amend the designation of the Morrisons store at Crossmyloof as an Other Retail and Commercial Location on the City Development Plan Policy and Proposals Map.

00575/2/004 Wm Morrison Supermarkets plc - The Newlands Morrisons store is separated from Shawlands Town Centre by Pollok Football Ground, an area of housing and a railway bridge that forms a natural boundary to the Town Centre. The retail character of the site has been recognised by its designation as Other Retail and Commercial on the CDP Policy and Proposals Map.

No modifications recommended.

00575/2/005 Wm Morrison Supermarkets plc - The Morrisons Cardonald store and car park are contiguous to the northern boundary of part of Cardonald Town Centre. Incorporating the site within the town centre would be consistent with the intention of the Policy and reflect the nature of the store.

The Reporter could, if so minded, amend the Town Centre boundary to include the store as shown on the site plan.

00580/1/001 Great Western Unit Trust - The Plan states that Other Retail and Commercial Leisure Centres should be complementary to and not undermine Town Centres. The Council considers that this adequately sets out the general policy relationship between these parts of the Network which will be expanded upon in Supplementary Guidance. The CDP priority is to protect Town Centres from development elsewhere that might harm them. There is no precedent in the City for 'linking together' a traditional local centre with an adjacent Other Retail and Commercial Centre as indicated in the objection.

No modifications recommended.

00637/10/001 Dowanhill Hyndland and Kelvinside Community Council - "The preferred location of Town Centre uses, including superstores, will be set out in Supplementary Guidance and will be based on the sequential approach as set out in Scottish Planning Policy (SPP) (*CE2 para. 68*). The LDP Main Issues Report identified no further development of new superstores as a preferred option however it is now considered that this approach would not be consistent with paragraphs 70-73 of the SPP.

No modifications recommended.

00642/2/001 Asda Stores Limited - Robroyston Retail Park (including Asda) to the North of Saugh's Rd, along with an area to the South, are designated Other Retail and Commercial on the CDP Policy and Proposals Map. City Plan 2 identified the potential for a new town centre and the Council has since prepared a Town Centre Masterplan Brief (OC99) intended to advance this process. It sets out the issues a Masterplan needs to address and also the need to consider the impact that a new town centre would have on the Network of Centres. No Masterplan has been produced in response to this Brief and neither has the potential retail impact been considered. Therefore it is the Council's view that designating a Town Centre that includes the Retail Park would be premature. Supplementary Guidance will however identify an opportunity to create a Town Centre thereby maintaining the current City Plan position. The land south of Saughs Road has permission for a range of town centre uses including 2,998sqm of retail (App. No. 10/01286/DC). Therefore the current designation has not impeded the provision of Town Centre Uses to serve the Community Growth Area.

No modifications recommended.

### Commercial Centres

#### Objecting

00144/2/001 Bill Carson, 00439/1/001 Gobafoss General Partner Ltd, 00557/3/001 Ediston Properties Ltd - The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was



incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan. In preparing this Guidance the Council will undertake a review of all Other Retail and Commercial Centres in the City, including Robroyston and Auldhouse Retail Parks, in order to define their role in the Network of Centres. This will inform the assessment criteria set out for the Other Retail and Commercial Leisure Centres. It is not considered appropriate to set out these restrictions within the Plan and these will appear in the supplementary guidance for the Policy.

This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption.

No modifications recommended.

### Out of Centre Designations and Proposals

#### Objecting

00006/2/001 ROCK DCM - The Plan contains policies that operate at a City wide level. Plans for the Glasgow Green/Barras area will be taken forward through the preparation of the Inner East Strategic Development Framework - which will be subject to public consultation.

No modifications recommended.

00597/1/002 St Enoch Trustee Company Ltd - Protection of the City Centre is a key principle in the Proposed Plan that needs to be balanced with delivering appropriate development across the City. The proposed modification would represent a barrier to development and would not achieve the broad aims of the Plan. Nevertheless the Council recognises the need to protect the City Centre and Supplementary Guidance will address this.

No modifications recommended.

00630/1/004 John Lewis - The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan. This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption. This will include criteria for requiring Retail Impact Assessments in relation to out of centre development.

No modifications recommended.

### Technical Guidance

#### Objecting

00087/6/001, 00087/6/002, 00087/6/003, 00087/6/005 Kartar Singh Barhaya - The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary Guidance

that will accompany the Plan. Supplementary Guidance regarding Food and Drink uses which contains detailed policy criteria was published for consultation in August 2014 and the submissions made here will be incorporated in the assessment of all comments made on that supplementary guidance. It should be noted that all this supplementary guidance shall be re-issued as part of a single Network of Centres guidance which reflects the streamlined and simplified approach for reducing the amount of guidance being prepared as described in Issue number 54. This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption.

No modifications recommended.

00087/6/006 Kartar Singh Barhaya - This is not an appropriate matter for the City Development Plan to consider and would be a material consideration for the assessment of a development proposal.

No modifications recommended.

00143/4/001 Ms Muriel Pearson - Promoting better public transport connections to more peripheral communities would be a positive addition to the policy and consistent with the aims of the policy and Plan's spatial strategy.

The Reporter could, if so minded, amend Policy CDP4, Assessment of Development Proposals 1. Town Centres (fourth bullet point) as follows: Support public transport connections between Town Centres , as highlighted in Figure 9 of Policy CDP1: Sustainable Spatial Strategy, and also promote access to Major Town centres and local shopping facilities for peripheral communities.

00429/12/001 Sportscotland – This response should be read in conjunction with the response to (00429/11/001) in Issue 7. The reference to the City Centre being a primary location for education uses is not intended to suggest that all schools be located only in city or town centres. It may be helpful, therefore, to remove education from this list to avoid uncertainty, particularly as this will not affect the aims of the policy.

The Reporter could, if so minded, remove reference to “education” from the first bullet point under part 1 “Town Centres” of the Policy.

00479/16/004 Hillhead Community Council - Following the publication of Scottish Planning Policy (*CE2, para. 67*) which raised the issue of the over-provision and clustering of uses such as payday lenders and bookmakers in town centres, Glasgow City Council and West Dunbartonshire Council have been working with the Scottish Government on a town centre pilot study. This study will consider whether the number and concentration of these uses affects the character and amenity of centres and the well-being of communities. It is anticipated that this will lead to the publication of Supplementary Planning Guidance on this issue later in 2015. In advance of the outcome of this study, it would not be appropriate to amend the Plan.

No modifications recommended.

00479/16/005 Hillhead Community Council - The objection relates to an operational issue between two Council Services and is not a City Development Plan matter.

No modifications recommended.

00479/16/006 Hillhead Community Council - The objection relates to an operational issue that will be assessed through the development management process on a case by case basis. The Council does not consider that it is appropriate for the City Development Plan to address an issue of this level of detail.

No modifications recommended.

00479/16/007 Hillhead Community Council - The storage and disposal of refuse will be addressed through Placemaking Supplementary Guidance that will accompany the Plan.

No modifications recommended.

00479/16/008 Hillhead Community Council - The Council does not intend to include Business Improvement District proposals within the Proposed City Development Plan. However as BID proposals emerge their suitability for inclusion in Supplementary Guidance will be monitored and consultation undertaken as appropriate.

No modifications recommended.

00479/18/001 Hillhead Community Council - Tesco have informed the Council of their intention not to proceed with the proposed superstore at Glasgow Harbour. (OC101)

No modifications recommended.

00479/18/002 Hillhead Community Council – The overall premise of the Plan seeks to promote non-motorised travel and then use of public transport over use of private motor cars. In terms of deliveries this is a matter which is beyond the more strategic content of the Plan and Policy CDP 4 and is therefore a matter which would be considered in supplementary guidance.

No modification recommended.

00544/1/001 Adam Bruce - The easternmost site was considered by the Reporter at the City Plan 2 Local Plan Inquiry (OC102) when the Reporter found that the site should not be re-designated Other Retail and Commercial Leisure on the following grounds:

- i. the site was found to fall within the definition of open space as set out in Scottish Planning Policy.
- ii. its status as a former railway formation with a reasonable prospect of being reused as a rail, tram, bus rapid transit or active travel route meant it should be safeguarded for this purpose.

With regard to the second of these grounds the Council accepts there is no longer a reasonable prospect of the site's reuse as a transport route and therefore the site is no longer safeguarded for this purpose in the Proposed Plan. With regard to the first point the Reporter found that the site forms part of a larger area of open space and forms a visual break between the commercial uses along London Road and the residential area to the north. On this basis the Reporter was not persuaded that the designation conflicts with the definition of open space set out in Scottish Planning Policy. The Council considers that this reasoning still applies and the site should be retained as open space pending more detailed consideration of the local contexts being developed to support the open space strategy which will consider the role of such sites as part of the wider green network.

With regard to the westernmost site. It is accepted that the City Plan 2 designation as DEV2 Residential and Supporting Uses is not appropriate. Consequently the designation in the proposed Plan is CDP1 - Placemaking Principle in recognition of the diverse land use mix in the immediate locality with the site being bounded to the west by a row of housing and a bowling green, to the north by Fullarton Park and by a furniture store to the east. The Council further considers that the established use of the site for vehicle sales, rental and display is not of a nature that would justify the re-designation of the site as Other Retail and Commercial Leisure and that re-designation of this site would create a fragmented land use pattern in the area since it is not considered that it would be appropriate to re-designate the bowling green and housing which would effectively become isolated between two Other Retail and Commercial Leisure areas. On this basis the Council would resist the modification.

No modifications recommended.

00597/1/003 St Enoch Trustee Company Ltd - The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan. This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption.

No modifications recommended.

00609/4/001 Pollokshields Community Council - The Local Development Plan does not propose to re-designate the area for retail use. There is no 'Mixed Use' Designation in the Proposed Plan. The site undesignated is a Housing Land Supply site.

No modifications recommended.

00630/1/001, 00630/1/005 John Lewis - The policy sets out that development proposals outwith town centres will be assessed in line with the sequential approach. The detailed modifications relating to complimentary uses to town centres and proposals that would undermine town centres are detail that will be provided in supplementary guidance which will also set out the details of the sequential approach. The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan. This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption. In light of this it is not considered appropriate to contain the detailed modifications within the Policy.

No modifications recommended.

00630/1/002 John Lewis - Protection of the City Centre is a key principle in the Proposed Plan however the Plan also seeks to deliver appropriate development across the City. The proposed modification would represent a barrier to development and would not achieve the broad aims of the Plan. Nevertheless the Council recognises the need to protect the City Centre and Supplementary Guidance will address this.

No modifications recommended.

00633/13/002 Strathclyde Partnership for Transport – It is considered that the proposed alteration would be a helpful clarification of the policy and would be consistent with the Plan's Strategic Aims.

The Reporter could, if so minded, amend Policy CDP4, Assessment of Development Proposals 1. Town Centres (fourth bullet point) as follows: Support public transport connections between Town Centres, as highlighted in Figure 9 of Policy CDP1: Sustainable Spatial Strategy, and also promote access to Major Town centres and local shopping facilities for peripheral communities.

00633/13/004 Strathclyde Partnership for Transport - The CDP provides policy support for development proposals that improve connections between centres. This will become a criterion for assessing planning applications. The objection refers to 'mechanisms for delivery' and specifically to the inadequacy of developer contributions to achieve delivery. The Council considers that setting out how this policy aim will be funded lies outwith the policy remit of the Plan.

No modifications recommended.

00634/2/004 Dennistoun Community Council - Policy CDP 4 recognises the challenges faced by Town Centres. It states that:

'in recent years, competition from alternative locations, internet shopping and the general downturn in the economy have served to challenge the retail function of some of the local town centres. To help revitalise town centres, the draft revised SPP (published for consultation by Scottish Government in April 2013) and the National Review of Town Centres Report both propose a 'Town Centres First' approach where town centres are the preferred location, not just for retail uses, but for a range of uses including cultural and community facilities, leisure, entertainment, recreation, as well as homes and businesses.'

It is considered that the level of detail proposed through this representation is not necessary in the Plan itself. The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan. This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption. Supplementary Guidance will be brought forward which will detail the approach to tackling long-term vacancies in town centres.

No modifications recommended.

### Retail Applications Assessment Criteria

#### Objecting

00087/6/004, 00087/6/007 Kartar Singh Barhaya - The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan. This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption.

No modifications recommended.

00424/1/002 Southside Housing Association - The Local Development Plan does not propose to re-designate the Gas Works site for retail use.  
No modifications recommended.

00545/2/001 Allied Vehicles Limited, 00568/1/001 Shawlands Retail Ltd - The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan. This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption.

No modifications recommended.

00597/1/004 St Enoch Trustee Company Ltd - The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan. This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption. This will include criteria for requiring Retail Impact Assessments.

No modifications recommended.

00630/1/003 John Lewis - The Plan contains policies which operate at a strategic, City wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan. This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption.

No modifications recommended.

00634/2/002 Dennistoun Community Council - Following the publication of Scottish Planning Policy (*CE2 paras. 67*), which raised the issue of the over-provision and clustering of uses such as payday lenders and bookmakers in town centres, Glasgow City Council and West Dunbartonshire Council have been working with the Scottish Government on a town centre pilot study. This study will consider whether the number and concentration of these uses affects the character and amenity of centres and the well-being of communities. It is anticipated that this will lead to the publication of Supplementary Planning Guidance on this issue later in 2015. In advance of the outcome of this study, it would not be appropriate to amend the Plan.

No modifications recommended.

#### Planning Studies/Town Centre Reviews

##### Objecting

00567/1/001 Highland Properties Group – The site in question currently has consent for a 26,000 sqm. Home and Lifestyle Centre (incorporating a supermarket) and is a significant retail development opportunity within the city. It forms part of a larger area designated Other Retail and Commercial Leisure in the Policy and Proposals Map and is bordered

on either side by bulky goods retail uses immediately to the East and West. The proposal would lead to the fragmentation of the area designated Other Retail and Commercial and effectively divide it in two. Therefore the Council considers that the retail designation should be maintained.

No modification recommended.

00634/2/001 Dennistoun Community Council - The Council's Review of Centres is on-going and will be used to identify the role of each Centre in Supplementary Guidance. Once the preparation of this Guidance is complete the Review of Centres will also be made available.

No modifications recommended.

00634/2/003 Dennistoun Community Council – It is anticipated that Dennistoun town centre will fall within the scope of the Inner East Strategic Development Framework which will provide the opportunity to consider a renewed focus on the town centre to align with the centres function.

No modification recommended.

#### General Comment

#### Objecting

00479/56/001 Hillhead Community Council - This is not a matter for the Plan to address, but relates to the use of the public road, which is governed by other legislation.

No modifications recommended.

00818/4/004 Scottish Property Federation - Policy CDP 4 seeks to promote the primary retail, office and leisure functions of the city centre. The Plan does not set restrictions for a particular use within the City Centre beyond these primary functions. Therefore it is considered that the statement in part 1 of Assessment of Development Proposals would allow sufficient flexibility to allow a more flexible approach. The background paper prepared to inform the preparation of the Plan has set out that the requirement to retain a continuous retail frontage on the Primary Retail Streets (which includes Sauchiehall Street and Argyle Street) would be retained subject to the removal of the westernmost block of Sauchiehall Street, which does suggest a relaxation in approach. However, as the Network of Centres Supplementary Guidance is developed it is intended to revisit the evidence available regarding the Primary Retail Streets to establish whether the Supplementary Guidance should alter the approach proposed in the background paper any further. However, it is considered that the policy wording does accommodate the flexibility to deliver this and on this basis it is considered that there should be no change.

No modification recommended.

#### **Reporter's conclusions:**

#### City Centre – Boundaries and Functions

1. The council advises that the omission of the area between Cathedral Street and

Buchanan Galleries from the Principal Retail Area is a mapping error. I shall therefore recommend that the boundary be re-drawn accordingly.

2. The site bounded by Trongate, Candleriggs, Wilson Street and Hutcheson Street lies within the City Centre Principal Retail Area, but policy CDP4 states that the council will support “*the primary retail, office and leisure functions of the City Centre*”. The supporting text refers to the ‘town centres first’ approach, where town centres (including city centres) are the preferred location for a range of uses including leisure and entertainment, recreation, as well as homes and businesses. I do not consider that the designation should inhibit an appropriate mixed use proposal for the Candleriggs site therefore.

3. I acknowledge that the function of the western end of Sauchiehall Street is changing, and that the street now contains a variety of city centre uses as well as Class 1 retailing. The council has clarified that it does not intend to preclude other uses in the Principal Retail Area, providing the range of Class 1 uses is maintained. Further detail on the matter is to be given in Supplementary Guidance, which is likely to make the distinction between the pedestrianised (eastern) and non-pedestrianised (western) sections of Sauchiehall Street. Meanwhile I agree with the council that it would be helpful to re-name the ‘Principal Retail Area’ as the ‘Principal Retail and Commercial Area’, to clarify the matter.

4. With regard to the request to amend policy CDP4 to provide more detailed guidance on the town centre hierarchy and sequential approach, I am satisfied that the proposed policy, though strategic in nature, is consistent with the approach outlined in Scottish Planning Policy. The greater certainty which is sought will be provided in the associated Supplementary Guidance, which will be consulted upon.

#### Town Centres - Boundaries and Functions

5. Hillhead Community Council points out that the strip of land north of Kersland Lane has always been residential, rather than commercial. I therefore agree that it should be removed from the Town Centre designation.

6. I understand the community council's anxiety to maintain the primary retail function of the Town Centre around Byres Road, and to avoid an over-concentration of entertainment, hot food and office uses. I also appreciate the concern to support small retailers and discourage non-retail uses. Policy CDP4, which is in general terms, aims to support the retail function of Glasgow's Major Town Centres, with detailed guidance on the matter to be supplied in Supplementary Guidance. On that basis I see no need to amplify policy CDP4 to take account of the community council's objection.

7. I note that the Church Street triangle was included within the town centre as defined in Glasgow City Plan 2. I consider that the Church Street triangle falls naturally into the town centre designation, given its location adjoining the main shopping street of Byres Road. Any proposals for licensed/entertainment premises would require to take account of the provisions of policy CDP4 and the associated Supplementary Guidance, and of any concerns expressed by neighbouring residents.

8. The Main Issues Report records that City Plan 2 identified the potential for a town centre at Robroyston to serve the Robroyston/Millerston Community Growth Area. City Plan 2 proposed:

*“Through the masterplan for the Community Growth Area, investigate the potential for a*



*new town centre at Robroyston and for improvements to the local road network. Should the potential for a new town centre at Robroyston be identified, its delivery would require to be promoted through the Development Plan process.”*

9. The council has prepared a draft development brief intended to inform the production of a masterplan that will take forward the town centre concept. The brief advises that any change in designation to town centre would require to: be justified in its strategic and city-wide context; examine the potential scale of retail and commercial leisure uses and the potential impact on adjacent centres and the city centre; and establish that the residential areas at Robroyston can sustain this level of activity without having an adverse effect on existing centres.

10. It is unfortunate that this work has yet to be carried out, but until it has I can only agree that it would be premature to approve any change in designation. Meanwhile I note that planning permission has been granted for a range of town centre uses on the land south of Saughs Road, so the lack of designation does not appear to have inhibited retail development in the area.

11. Wm Morrison Supermarkets plc argue that their supermarkets which are established within the City at Bailieston, Newlands, Cardonald, Gallowgate and Crossmyloof should be included within the designated town centres next to or near to the stores. I accept that the stores fulfil an important retail function, but it is necessary to consider the relationship of each store to the nearby town centre in order to address the objection.

12. I accept that the Bailieston store, which is already designated as an Other Retail and Commercial Leisure Centre and is separated from the neighbouring town centre only by a corridor of protected open space, should be included within the designated Bailieston Town Centre. That would be consistent with the provisions of policy CDP4.

13. Similarly, the Gallowgate store lies adjacent to, and functions as part of the Barras Centre. I therefore agree that the Barras Town Centre designation should include the Morrisons store.

14. The Morrisons store at Crossmyloof is located some distance from the nearest town centre, but I agree with the council that it should be designated as Other Retail and Commercial Leisure in the Proposed Plan, due to the key retail function which it performs in the area.

15. The Newlands store does not adjoin Shawlands Town Centre; there is a football ground and housing in between. There is therefore no justification for extending the town centre designation to encompass the store. The existing Other Retail and Commercial Leisure designation is appropriate.

16. The Morrisons store at Cardonald abuts and functions as part of Cardonald Local Town Centre. I agree that the town centre designation should be modified to reflect that.

17. The Great Western Retail Park is a modern retail park which is separated from the designated Drumchapel town centre to the north by an established industrial area (designated as an Economic Development Area). Policy CDP4 seeks to ensure that development in Other Retail and Commercial Leisure Centres such as this is complementary to and does not undermine Town Centres. I am convinced that is the right approach, and consider that it would be unnecessary and inappropriate to attempt to

create a policy link between the retail park and the town centre.

18. With regard to the objection by Dowanhill Hyndland and Kelvinside Community Council, a total embargo on new superstores outwith town centres would not be supported by national planning policy set out in Scottish Planning Policy. Although SPP indicates that development plans should adopt a sequential town centre first approach, it also advises that the approach should be applied flexibly to ensure that different uses are developed in the most appropriate locations. Paragraph 73 sets out the circumstances where out-of-centre locations may be considered for uses which generate significant footfall.

#### Commercial centres

19. The potential change in status of the retail park at Robroyston is discussed above.

20. Paragraph 63 of SPP accepts that where necessary to protect the role of town centres, plans should specify the function of commercial centres, for example where retail activity may be restricted to the sale of bulky goods. I can understand why the original restriction has been relaxed to a degree at Auldhouse Retail Park. However I consider that this issue is best reviewed across all retail parks in the City (including Robroyston if it is not re-designated as a town centre), and that any restrictions or further relaxations should be addressed and justified within the forthcoming supplementary guidance. This will involve a level of detail inappropriate to this city-wide local development plan.

#### Out of Centre Designations and Proposals

21. Given that the Inner East Strategic Development Framework will address the Glasgow Green/Barras area, there is no need to include detailed proposals for this district within the Proposed Plan.

22. I do not doubt the council's commitment to maintain and strengthen the role of Glasgow City Centre, which is clearly stated in policy CDP4 and in the supporting text at page 37 of the Proposed Plan. I consider that there is no need to include a 'presumption against out of town development', which in any case would not appear to chime with the sequential approach outlined in SPP.

23. SPP advises that an assessment of the impact on the town centre should be carried out where a retail and leisure development with a gross floorspace over 2,500 square metres is proposed outwith a town centre, contrary to the development plan. The council proposes to refine the circumstances when a retail impact assessment is required, within the Supplementary Guidance to be prepared in support of policy CDP4. In so doing the objection by John Lewis should be satisfied.

#### Technical Guidance

24. The technical considerations relating to takeaway proposals, such as carbon filter ventilation systems, internal and external flues, and parking are detailed matters which are outwith the scope of this concise local development plan. They are more appropriately addressed in the Supplementary Guidance which will follow.

25. I agree with Muriel Pearson that policy CDP4 would be improved if it promoted enhanced public transport connections between local and major centres and the city

centre and between peripheral schemes and major centres, and better access to local shops. I propose to recommend the change proposed by the council.

26. Paragraph 68 of SPP states that development plans should adopt a sequential town centre first approach when planning for uses which generate significant footfall, including retail and commercial leisure uses, offices, community and cultural facilities and, where appropriate, other public buildings such as libraries, and education and healthcare facilities (my emphasis). For the reasons explained by sportscotland there will be many occasions when the town or city centre is not the best location for sport uses and schools with playing fields. I agree that it would be best to remove 'education' from the list of uses which policy CDP4 directs to the City Centre as the primary location.

27. In relation to betting shops and similar businesses, paragraph 67 of SPP state:

*"There are concerns about the number and clustering of some non-retail uses, such as betting offices and high interest money lending premises, in some town and local centres. Plans should include policies to support an appropriate mix of uses in town centres, local centres and high streets. Where a town centre strategy indicates that further provision of particular activities would undermine the character and amenity of centres or the well-being of communities, plans should include policies to prevent such over-provision and clustering."*

28. The key message is that any such restriction should be evidence based. The council is taking part in a town centre pilot study to consider whether the number and concentration of these uses affects the character and amenity of centres and the well-being of communities. The outcome of the study is likely to be Supplementary Guidance on the topic, but it would be premature to modify the Proposed Plan until the results of the study are known.

29. The issue of licences for pavement use, and problems of delivery vehicles and refuse storage on Byres Road, are not matters for the local development plan, though the storage and disposal of refuse will be dealt with in Supplementary Guidance.

30. I note there is no intention to include Business Improvement District proposals in the Proposed Plan; nor is there a current proposal to construct a superstore at Glasgow Harbour.

31. I can appreciate the concern to reduce the volume of vehicular traffic moving around town centres such as Byres Road, and to encourage the use of public transport where possible. One of the criteria of policy CDP2: Sustainable Spatial Strategy is to contribute towards the development of an active travel network and enhanced public transport accessibility within and between neighbourhoods, town centres and major employment destinations. Further consideration will be given to the matter in supplementary guidance, and I see no need to modify the Proposed Plan to provide further detail.

32. I am not persuaded that the two sites at London Road promoted by Adam Bruce should be allocated for Other Retail and Commercial purposes. The western area has an established use for vehicle sales, rental and display, rather than class 1 retail, and lies in an area of mixed uses including housing, a football pitch, a bowling green and a furniture store. As such it is not a suitable location for retail and commercial leisure uses. The eastern area is a corridor of unmaintained open space between commercial premises on the road frontage and a housing estate to the rear. The development of the eastern area

would create an island of retail and commercial uses, separate from the western area, in an inappropriate location to the rear of residential properties.

33. I agree with John Lewis and others that further clarification is required on the intended application of the sequential approach in Glasgow, including the circumstances where proposals for edge of centre developments might be acceptable. The further policy guidance on the role and function of Other Retail and Commercial Leisure Centres, and specifically which activities would complement and which would undermine town centres, will be given in Supplementary Guidance rather than the Proposed Plan which is intended to be a concise document. However I am satisfied that policy CDP4 makes clear that the City Centre is to be the primary location for retail, office, education, commercial leisure, tourism and civic uses serving the region, whereas town centres are assigned a supporting role.

34. The Proposed Plan does not allocate the former gas works site at Maxwell Road, Pollokshields for retail purposes. Instead the proposals map identifies the site as a Housing Land Supply site (H073).

35. I accept SPT's point that active travel is not an option for all residents, and that policy CDP4 should be modified accordingly. I do not consider that the Proposed Plan, which is essentially a land use document, is the right place to address the funding to improve connections between centres however.

36. Dennistoun Community Council draws attention to the pressures on local town centres which mean that the council may have to consider alternative uses for vacant buildings that were formerly shops or offices. This issue is acknowledged in the Context section which precedes policy CDP4, and will be addressed in detail in Supplementary Guidance.

#### Retail Applications Assessment Criteria

37. The detailed criteria for the assessment of retail applications including proposals outwith town centres, criteria for requiring formal retail impact assessments, and any minimum thresholds for retail uses in town centres, will be developed in Supplementary Guidance, and not within the Proposed Plan which is intended to be concise and strategic in nature. The Proposed Plan has a different function to City Plan 2, which was a much more detailed document. I therefore see no purpose in expanding the criteria of policy CDP4 to accommodate the representations made.

38. I appreciate the concern expressed by Dennistoun Community Council about the proliferation of pawn shops, money lenders and payday loan companies in disadvantaged communities. However, I am satisfied that this will be addressed in Supplementary Guidance when the outcome of the town centre pilot study (referred to above) is known.

#### Planning Studies/Town Centre Reviews

39. Issue 17 deals with the issue of meeting housing needs, but the Highland Properties Group site at London Road lies within an area designated for retail and commercial leisure purposes, and there is an implemented retail consent on the site. The land is bounded by existing retail uses on two sides and an Economic Development Area on another. I therefore consider that the designation as Other Retail and Commercial Leisure should remain.

40. Supplementary Guidance will identify the role of each town centre, including Dennistoun town centre (which will also be the subject of further examination in the Inner East Strategic Development Framework).

#### General Comment

41. The future expansion or otherwise of pay and display bays in Hillhead is not a land use planning matter, and lies outwith the scope of the Proposed Plan.

42. I understand the concern that secondary areas, including sections of Sauchiehall Street and Argyle Street, will struggle to compete for major occupiers, and that flexible planning policies will be required in such areas. However, I am content that policy CDP4 contains sufficient flexibility to address the point, which can be developed further in supplementary guidance.

#### Supporting representations

43. I note the representations made in support of the Plan which are summarised above, but they do not raise any unresolved issues which I require to examine.

#### **Reporter's recommendations:**

Modify the boundary of the Principal Retail Area to include the element of the North Cutting to the north of Cathedral Street.

Modify the Proposed Plan by changing all references to 'Principal Retail Area' in the Policy and the Policy and Proposals Map to '*Principal Retail and Commercial Area*'.

Modify the Proposed Plan by amending the Byres Road Town Centre boundary to exclude the area of land north of Kersland Lane.

Modify the Proposed Plan by extending the Bailleston Town Centre boundary to include the Morrisons store that is adjacent to the Centre as well as the strip of Greenspace in-between the existing centre and the Other Retail and Commercial Leisure Centre designation.

Modify the Proposed Plan by extending the Barras Town Centre boundary to include the adjacent Morrisons store.

Modify the Proposed Plan to designate the Morrisons store at Crossmyloof as an Other Retail and Commercial Location on the Policy and Proposals Map.

Modify the Proposed Plan to extend the Cardonald Local Town Centre designation to include the adjacent Morrisons store.

Modify Policy CDP4, Assessment of Development Proposals 1. Town Centres (fourth bullet point) as follows: "*Support public transport connections between Town Centres, as highlighted in Figure 9 of Policy CDP1: Sustainable Spatial Strategy, and also promote access to Major Town centres and local shopping facilities for peripheral communities.*"

Modify Policy CDP4 to remove the reference to "education" from the first bullet point under part 1 "Town Centres" of the Policy.

Issue 12	Resource Management	
Development plan reference:	Policy CDP 5 Resource Management (Pages 39-42)	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
Muriel Pearson (00143) ReachCSG (00405) The Coal Authority (00426) Hillhead Community Council (00479) Scotia Gas Networks (SGN) (00483) Persimmon Homes (00497) Homes for Scotland (00602) Cranhill Development Trust (00614) Yorkhill and Kelvingrove Community Council (00623) Strathclyde Partnership for Transport (00633)		
Provision of the development plan to which the issue relates:	Policy CDP 5 - Resource Management, particularly its provisions in relation to: petroleum exploration and development; low and zero carbon generating technologies; renewable energy and heat; and coal and minerals.	
Planning authority's summary of the representation(s):		
<u>Renewable Heat and Energy</u>		
<u>Objecting</u>		
00143/5/001 Muriel Pearson - Potential District Heating Zones should be extended to include large scale areas of social housing such as Ruchazie.		
00143/5/002 Muriel Pearson - Retro fitting water source pumps to supplement other fuel services should be considered alongside new developments. Fuel poverty affects thousands of residents and tenants and reduction in fuel bills would greatly improve quality of life and disposable income.		
00143/5/003 Muriel Pearson - Potential thermal extraction from other sources should be explored alongside ground source. Ground, air and water sources would make a significant contribution to greenhouse gas emission savings. Reliance on bio-mass district heating would be short term and unsustainable.		
00143/7/001 Muriel Pearson - Potential District Heating zones should be extended to include large scale areas of social housing such as Cranhill, and due cognisance taken of thermal extraction from water sources as well as geo-thermal ground sources. A feasibility study should be undertaken which explores retro-fitting the Cranhill multi-storeys and providing district heating for new build on housing site H085.		
00614/3/001 Cranhill Development Trust - Policy CDP 5 should support the use of water sources to provide heat via heat pumps for housing estates such as Cranhill. Large heat pumps are a cleaner, more sustainable and more economic source of heat than fossil fuels bought from abroad. The Camlachie Burn runs under Cranhill and could be one such source.		

00623/1/004 Yorkhill and Kelvingrove Community Council - District heating and combined heat and power generation are rightly given high priority in Policy CDP 5. We suggest that the Yorkhill Hospitals site has good potential to be added to the list of proposed sites for evaluation.

00479/32/001 Hillhead Community Council - Object to policy CPD5 as Figs 13 and 14 are not clear, therefore have reservations on District Heating. It appears that a large section of our area is scheduled for District Heating. We need much more information on what it entails and how it is to be fitted inconspicuously into the historic setting. Policy should state 'The Council will, in principle, support' rather than 'The Council will support'.

#### Supporting

00633/14/001 Strathclyde Partnership for Transport - Support for "proposals to develop District Heating networks based on low carbon and renewable sources, or that facilitate the more efficient use of heat from existing energy generation or other processes". SPT is currently investigating the opportunity to extract heat from water ingress in the Subway. Would welcome the opportunity to feed into the development of the energy supplementary guidance with regard to the potential to support the development of District heating networks.

#### Oil, Gas and Minerals

#### Objecting

00405/1/001 ReachCSG - Policy CDP5 is inconsistent with existing and emerging Scottish Planning Policy (SPP), and does not reflect the general support for the onshore oil and gas industry. The policy should be reworded accordingly, particularly to exclude any suggestion that planning applications for extraction of oil and gas are unlikely to be acceptable within the Glasgow City boundary.

00426/2/001 The Coal Authority - Objects to the wording of policy CDP5 as regards workable mineral resources. Policy should be amended to indicate that the Council will safeguard workable mineral resources within the City to ensure that they are not sterilised by other development or that prior extraction of the mineral resources should be considered where new development is proposed.

00483/3/001 Scotia Gas Networks (SGN) - The Plan should include a policy that specifically deals with the redevelopment of hazardous installations, to read: "Policy Hazardous Installations - Hazardous installations will be identified in the adopted Proposal Map. The Council will take into account the need to incentivise and fund decommissioning as part of any redevelopment proposal through higher value land uses."

#### Supporting

00479/32/002 Hillhead Community Council - Support the general principles of policy CDP 5, especially restrictions on oil and gas extraction. Pleased that the dangers inherent in the undermining of Glasgow are recognised. These should take precedence over extraction. Fracking is not supported due to potential damage: disposal of polluted water and chemicals is not regulated or certain to be environmentally acceptable; potential harm to water table.

00483/3/002 Scotia Gas Networks (SGN) - Support the identification of the gas holder site at Cleveden Road, Temple as "white land" on the Proposals Map. There are significant costs related to decommissioning the gasholders, and residential/retail uses would be appropriate given the predominant character of surrounding land. Traditional employment uses at this site would not be deliverable as these would not generate significant value to offset remediation costs.

### Low and Zero Carbon Generating Technologies

#### Objecting

00497/11/001 Persimmon Homes - The policy addresses low and zero carbon issues and includes aspirational standards which are matters regulated by the Building Standards. Development Plans have no role in technical matters regulated by the Building Standards. It is not the place of Development Plans to anticipate, or exceed, the national Building Standards. That introduces confusion and uncertainty for developers working in different plan areas. It is impractical for developers to design and build to different local standards. The final two paragraphs of the policy, and accompanying Table 3, should be deleted and replaced with "Developers should also consider whether the use of low and zero-carbon technologies can contribute to more energy efficient houses in a cost-effective way."

00602/2/001 Homes for Scotland - The policy addresses low and zero carbon issues and includes aspirational standards which are matters regulated by the Building Standards. Development Plans have no role in technical matters regulated by the Building Standards. It is not the place of Development Plans to anticipate, or exceed, the national Building Standards. That introduces confusion and uncertainty for developers working in different plan areas. It is impractical for developers to design and build to different local standards. The final two paragraphs of the policy, and accompanying Table 3, should be deleted and replaced with "Developers should also consider whether the use of low and zero-carbon technologies can contribute to more energy efficient houses in a cost-effective way."

### **Modifications sought by those submitting representations:**

#### Renewable Heat and Energy

00143/5/001 Muriel Pearson - Amend Figure 13 of the City Development Plan to show Ruchazie as a Potential District Heating Zone.

00143/5/002 Muriel Pearson - Amend policy CDP 5 to make reference to retro fitting water source pumps to existing developments.

00143/5/003 Muriel Pearson - Amend policy CDP 5 to make reference to potential thermal extraction from other low and zero carbon sources.

00143/7/001 Muriel Pearson - Amend Figure 13 of the City Development Plan to show Cranhill as a Potential District Heating Zone.

00614/3/001 Cranhill Development Trust - Policy CDP 5 should support the use of water sources to provide heat via heat pumps for housing estates such as Cranhill.

00623/1/004 Yorkhill and Kelvingrove Community Council - Policy CDP5 should be reworded to identify the Yorkhill Hospitals site as having potential for combined heat and power.



00479/32/001 Hillhead Community Council - Policy CDP5 should be reworded to state that 'The Council will, in principle, support proposals to develop District Heating Networks ...' rather than 'The Council will support ...'.

#### Oil, Gas and Minerals

00405/1/001 ReachCSG - Policy CDP5 should be reworded to accord with Scottish Planning Policy and to exclude any suggestion that planning applications for extraction of oil and gas are unlikely to be acceptable within the Glasgow City boundary.

00426/2/001 The Coal Authority - Policy CDP5 should be reworded to indicate that the Council will safeguard workable mineral resources within the City to ensure that they are not sterilised by other development or that prior extraction of the mineral resources should be considered where new development is proposed.

00483/3/001 Scotia Gas Networks (SGN) - Include a new policy in the Plan to deal with the redevelopment of hazardous installations, to read: "Policy Hazardous Installations - Hazardous installations will be identified in the adopted Proposal Map. The Council will take into account the need to incentivise and fund decommissioning as part of any redevelopment proposal through higher value land uses."

#### Low and Zero Carbon Generating Technologies

00497/11/001 Persimmon Homes, 00602/2/001 Homes for Scotland - Delete the last two sentences of fifth paragraph of Policy CDP 5 and replace with "Developers should also consider whether the use of low and zero-carbon technologies can contribute to more energy-efficient houses in a cost-effective way." Delete Table 3.

### **Summary of responses (including reasons) by planning authority:**

#### Renewable Heat and Energy

##### Objecting

00143/5/001, 00143/7/001 Muriel Pearson, 00623/1/004 Yorkhill and Kelvingrove Community Council - Policy CDP5 is not intended to limit the development of district heating to those areas shown on Figure 13. Figure 13 (as stated in the context to the policy) is intended to provide an initial indication of the areas of the City with greatest potential for district heating networks. The Council will bring forward Supplementary Guidance to support policy CDP5 and this will include updated and more detailed heat mapping as a tool to aid understanding of where district heating may be most successfully implemented. However, the policy makes it clear that district heating is supported generally, stating the 'Council will support proposals to develop District Heating networks based on low carbon and renewable sources, or that facilitate the more efficient use of heat from existing energy generation or other processes.'

No modifications recommended.

00143/5/002, 00143/5/003 Muriel Pearson, 00614/3/001 Cranhill Development Trust - In line with NPF3, which aims to reduce energy demand and improve efficiency (CE1, para 3.8), further diversification of energy supplies is required. The Plan (Policy CDP5) makes it clear that the Council will support proposals to develop District Heating networks based

on low carbon and renewable sources, or that facilitate the more efficient use of heat from existing energy generation or other processes. CDP5 also supports a wide range of technologies that generate energy and/or heat from renewable sources, and distribute it efficiently. Such sources would include air, water and ground source heat and heat from other sources, such as excess heat generated in manufacturing processes. The Council will produce Supplementary Guidance to support this policy position and to include advice on renewable sources of heat and energy.

No modifications recommended.

00479/32/001 Hillhead Community Council - Paragraph 159 of SPP (CE2) supports the development of heat networks in as many locations as possible and this is reflected in the wording of policy CDP5. Figure 13 is intended to provide an initial indication, based on heat mapping undertaken to date, of area of greatest potential for district heating. Policy CDP5 indicates that such proposals should not have an unacceptable impact on, amongst other things, the built environment or the amenity of surrounding uses. In addition, page 8 of the Plan indicates that the Plan requires to be read as a whole, and applications for district heating proposals will also require to be considered against other policy considerations, such as those set out in policy CDP9 on the Historic Environment.

No modifications recommended.

#### Supporting

00633/14/001 Strathclyde Partnership for Transport - Noted.

No modifications recommended.

#### Oil, Gas and Minerals

#### Objecting

00405/1/001 ReachCSG - SPP 2014 (CE2, para 245) states that applicants should undertake a risk assessment for all proposals for shale gas and coal bed methane extraction and goes on to indicate that this should identify onsite activities that pose a potential risk and explain how measures will be used to monitor, manage and mitigate any identified risks to health, amenity and the environment. The evidence from, and outcome of, the assessment should lead to buffer zones being proposed which will protect all sensitive receptors from unacceptable risks. Sensitive receptors are defined, in the SPP, as including, population, fauna, flora, soil, water, air, climatic factors, material assets and landscape. SPP also indicates that, where proposed distances are considered inadequate, the Scottish Government expects planning permission to be refused.

At present, there are only two, very small, areas of the City covered by a Petroleum Exploration and Development Licence - PEDL 162 (OC3). Whilst no risk assessment of the potential use of these areas for unconventional oil and gas extraction has been undertaken, it is considered that the westernmost area is so close to the existing urban population that a risk assessment is unlikely to be able to identify a buffer zone adequate to protect the population from impacts on amenity. The other area covered by PEDL 162 is close to the City Plan 2 Community Growth Area expansion at Robroyston, as shown on the Policy and Proposals Map. The proximity of the proposed population may give rise to similar amenity concerns. The Green Belt Review (OC46) also considered this area of

the City, with the site having been consulted on during the Additional Potential Locations for Development consultation over August-October 2013 (OC64, Prop 0080).

In their consultation response (OC56, Annex, Page 3), SNH indicated that they considered that this site does not have capacity for housing development because of adverse effects on landscape character and visual amenity – it's a prominent, north facing slope. Landscape is one of the sensitive receptors identified in SPP and it is considered that a risk assessment is unlikely to be able to identify a buffer zone adequate to protect the landscape features of this area. As a result, it is considered that applications for extraction of onshore oil and gas are unlikely to be acceptable in this area.

Whilst policy CDP5 was drafted before SPP 2014 was published, the remainder of the policy is considered to accord, broadly, with the new SPP. Should new PEDL licences be awarded in the City Council area, then the Council will require to be satisfied on grounds of safety and potential adverse impact on the environment have been fully addressed. This is not considered inconsistent with the new SPP's approach of risk assessment to monitor, manage and mitigate any identified risks to health, amenity and the environment. The Scottish Government's news release of 15 January 2015 (OC2) states that the SPP is explicit that buffer zones will be assessed by the planning authority and statutory consultees, with a strong expectation that planning permission should be refused if they are unacceptable. On this basis, the Objector's position, that the Plan should exclude any suggestion that planning applications for extraction of oil and gas are unlikely to be acceptable within the Glasgow City boundary, is not supported.

The Reporter could, if so minded, amend this aspect of policy CDP5 to provide greater clarity by more explicitly reflecting the terms of the new SPP, by replacing the bullet points following paragraph 2 with:

'Require a risk assessment to be undertaken to determine impacts on local communities, neighbouring uses and the environment. The assessment should identify onsite activities that pose a potential risk and explain how measures will be used to monitor, manage and mitigate any identified risks to health, amenity and the environment. The assessment should inform the identification of buffer zones to protect sensitive receptors (including population, fauna, flora, soil, water, air, climatic factors, material assets, landscape, and the interrelationship between these factors) from unacceptable risks. Where proposed distances are considered inadequate planning permission will be refused. Supplementary Guidance will set out further detail on how this is to be undertaken'.

00426/2/001 The Coal Authority - This objection deals with minerals generally, but with a particular emphasis on coal.

The Strategic Development Plan (CE6) identifies areas of search (in North and South Lanarkshire) for surface coal and aggregate minerals, with SDP Background Report 10: Mineral Search Areas (OC65) indicating that this reflects the basic geography of the resource. The SDP further indicates that these areas of search provide a basis for local planning authorities to address the issue through their LDPs and that the detailed methodology and approach to be adopted should be a matter to be determined by them.

Paragraphs 236 to 248 of Scottish Planning Policy (CE2) sets out how local development plans should address the extraction of minerals and coal. It indicates that they should safeguard all workable mineral resources which are of economic or conservation value and ensure that these are not sterilised by other development (para 237) and that, where

possible, plans should secure extraction prior to permanent development above workable coal reserves.

Glasgow is not shown as a search area in the SDP, therefore the issue is whether there are locations in the City where mineral and surface coal resources can be extracted prior to development taking place. Whilst the vast majority of Glasgow's land area is built up, the objection indicates that 'Prior extraction of surface coal can be successfully achieved within built up areas'. SPP (CE2), however, states that 'Consent should only be granted for surface coal extraction proposals which are either environmentally acceptable (or can be made so by planning conditions) or provide local or community benefits which clearly outweigh the likely impacts of extraction. Site boundaries within 500 metres of the edge of settlements will only be environmentally acceptable where local circumstances, such as the removal of dereliction, small-scale prior extraction or the stabilisation of mining legacy, justify a lesser distance' (para 244).

This would suggest that, for sites within Glasgow's built up area, the Council would require to be convinced that these would not be an adverse impact on communities. This would include impacts from disturbance, transport etc., or on the natural or built environments. Policy CDP 6 of the Plan sets out policy on mineral extraction and refers to such issues – the Council will bring forward Supplementary Guidance to support this policy that will set out further detail.

Outwith the urban area, Glasgow's Green Belt is, generally, very narrow, with the areas around Drumchapel, Crookston, Nitshill and Carmunnock, in particular, being very close to the urban population. In addition, OC55 illustrates what the Coal Authority considers to be the Surface Coal Resource in Glasgow. It shows that, in many parts of the Green Belt, there is not considered to be a surface coal resource. Elsewhere, proposals for the Community Growth Area at Broomhouse, Baillieston and Easterhouse are generally well progressed, and resources in these areas are unlikely to be recoverable. There are further complications in the remainder of the Green Belt in the form of: landfill sites (Broomhouse and Summerston), a proposed Wetland Park (around Easterhouse/Garthamlock as part of the CGA proposals); SSSIs and Local Nature Reserves; Cemeteries and the Antonine Wall Buffer Zone. CDP Background Report 13: Green Belt Review (OC46) provides further detail.

On this basis, it is considered that there are likely to be very few areas of Glasgow where surface coal or mineral extraction would be acceptable in practice and that no modification to policy is required.

Should the Reporter propose to modify the Plan to reflect SPP (CE2) paras 237 and 239 by identifying a need to safeguard workable coal/mineral resources and ensure they are not sterilised by other development, then it is considered that this should be caveated by reference to the need to ensure that impacts on local communities, the natural and built environments can be adequately controlled/mitigated, as set out in policy CDP6.

No modifications recommended.

00483/3/001 Scotia Gas Networks (SGN) - The context to this objection is that set out in 00483/3/002, which is an expression of support for the "identification" of the gas holder site at Cleveden Road, Temple as "white land" on the Policy and Proposals Map. It indicates that there are significant costs involved in de-commissioning gasholders, and this objection follows on from that statement, in seeking that this consideration is reflected

in plan policy.

Whilst it is recognised that end-uses which deliver higher land values may help in the redevelopment of such sites, it is not considered that this is a sufficient consideration, in itself, to warrant a separate policy or a departure from the Plan's spatial strategy. It is considered that policies CDP1: The Placemaking Principle and CDP2: Sustainable Spatial Strategy, and the other policies of the Plan, set an appropriate policy context against which proposals for redevelopment of hazardous installations should be considered.

No modifications recommended.

#### Supporting

00479/32/002 Hillhead Community Council – Noted (though see response to objection 00405/1/001).

No modifications recommended.

00483/3/002 Scotia Gas Networks (SGN) – Noted (though see response to objection 00483/3/001).

No modifications recommended.

#### Low and Zero Carbon Generating Technologies

##### Objecting

00497/11/001 Persimmon Homes, 00602/2/001 Homes for Scotland - Section 72 of the Climate Change (Scotland) Act 2009 (CE15) (the 2009 Act) inserts a new section (3F) into the Principal Planning Act which requires planning authorities to include policies in their local development plans that require all developments to be designed to ensure that new buildings 'avoid a specified and rising proportion of the projected greenhouse gas emissions from their use, calculated on the basis of the approved design and plans for the specific development, through the installation and operation of low and zero-carbon generating technologies'. The wording, suggested by the objectors as a replacement text for Table 3 and associated policy wording, would not meet this legislative requirement.

The Government has not provided guidance on how exactly they wish the requirements of the legislation to be translated into local development plans or whether a standardised approach across the country is being sought. The Council considers that a policy based on Section 7 Sustainability of the building standards is an easy to understand means of delivering the sort of policy that the Government is seeking (OC84, OC85, sections 7.0.6). City Plan 2 policy DES 2 (CE17) requires larger developments to meet EcoHomes or BREEAM ratings and it is considered that the use of Section 7 represents a lower cost method of assessment that will help the Council meet its duty, under section 44 of the 2009 Act (CE15), to act in the way best calculated to contribute to the delivery of the targets set in Part 1 of the 2009 Act when exercising its functions.

No modifications recommended.

**Reporter's conclusions:**Renewable Heat and Energy

1. Policy CDP5: Resource Management is clear that the council will support proposals to develop district heating networks based on low carbon and renewable sources, or that facilitate the more efficient use of heat from existing energy generation or other processes. Whilst Figure 13 gives an initial indication of the areas of the City with greatest potential for district heating networks, the list is not intended to be exhaustive. The supporting text at page 39 advises that the position is being updated through heat mapping and that the outcomes will be set out in Supplementary Guidance.
2. In that context I do not consider that the failure of the Proposed Plan to identify large areas of social housing such as Ruchazie and Cranhill, and the Yorkhill Hospitals site, as potential district heating zones is an omission. There is scope to examine the potential of these areas as part of heat mapping which will inform the forthcoming Supplementary Guidance.
3. Similarly, the terms of policy CDP5 are not exclusive – the policy supports “*a range of technologies that generate energy and/or heat from renewable sources, and distribute it efficiently.*” That could encompass ground, air and water sources, including retro-fitted water source pumps, providing they are efficient and do not have unacceptable impacts on the landscape, transport or amenity, and are consistent with other policies in the Proposed Plan and associated Supplementary Guidance.
4. I am satisfied that the potential of these technologies can appropriately be examined in Supplementary Guidance, and that there is no need to add to the list of approved technologies within policy CDP5.

Oil, Gas and Minerals

5. ReachCSG holds a PEDL licence covering an extensive area (400km<sup>2</sup>) of the Central Belt of Scotland, only 0.05km<sup>2</sup> of which lies within the City of Glasgow. However, it is likely that the company will apply for licences in further areas in the Central Belt, including land within the Glasgow city boundary. The representation seeks to amend policy CDP5 to bring it in line with Scottish Planning Policy (which was in draft when the representation was made), and to remove any suggestion that planning applications for extraction of oil and gas are unlikely to be acceptable within the boundary of the City. Instead it is suggested that the policy should generally support oil and gas extraction, subject to any planning application meeting appropriate environmental and residential amenity standards.
6. Paragraph 235 of Scottish Planning Policy (SPP), published in June 2014, states that the planning system should recognise the national benefit of indigenous coal, oil and gas production in maintaining a diverse energy mix and improving energy security, but minimise the impacts of extraction on local communities, the environment and the built and natural heritage.
7. I do not read SPP as giving in principle support or opposition to onshore oil and gas proposals; rather, it applies a risk assessment approach with the intention of establishing buffer zones to protect sensitive receptors from unacceptable risks. If there is an inadequate buffer, permission is to be refused. Paragraph 245 of SPP explains the

approach:

*“To assist planning authorities with their consideration of impacts on local communities, neighbouring uses and the environment, applicants should undertake a risk assessment for all proposals for shale gas and coal bed methane extraction. The assessment can, where appropriate, be undertaken as part of any environmental impact assessment and should also be developed in consultation with statutory consultees and local communities so that it informs the design of the proposal. The assessment should clearly identify those onsite activities (i.e. emission of pollutants, the creation and disposal of waste) that pose a potential risk using a source-pathway-receptor model and explain how measures, including those under environmental and other legislation, will be used to monitor, manage and mitigate any identified risks to health, amenity and the environment. The evidence from, and outcome of, the assessment should lead to buffer zones being proposed in the application which will protect all [sensitive receptors](#) from unacceptable risks. When considering applications, planning authorities and statutory consultees must assess the distances proposed by the applicant. Where proposed distances are considered inadequate the Scottish Government expects planning permission to be refused.”*

8. Following the publication of SPP, the Scottish Government imposed a moratorium on granting consents for onshore unconventional oil and gas, including hydraulic fracturing, on 28 January 2015, and a similar moratorium on underground coal gasification on 8 October 2015. The Note to Editors which accompanied the first announcement was in the following terms:

*“The Scottish Planning Policy relating to onshore unconventional oil and gas extraction states:*

- *Confirmation that the concept of buffer zones should be applied to all proposals for the first time;*
- *Putting in place an additional requirement for risk assessments to be prepared, using a source-pathway-receptor model, to ensure a transparent and evidence based approach to assessing whether proposed buffer zones are acceptable;*
- *Making explicit that buffer zones will be assessed by the planning authority and statutory consultees, with a strong expectation that planning permission should be refused if they are unacceptable;*
- *Ensuring that operators are upfront about their plans and that communities are consulted on all unconventional gas developments, including close involvement in the risk assessment process;*
- *Requiring a fresh planning application (and public consultation) if permission was not sought for hydraulic fracturing but developers subsequently intend to undertake this process.”*

9. In order to conform to SPP, I agree with the council that policy CDP5 should be amended to mirror the risk assessment approach outlined in paragraph 245. In applying this approach, it may be that potential sites in Glasgow will be determined to be too close to sensitive receptors, but it is impossible to confirm that in the absence of a risk assessment of a particular proposal. I therefore agree with the representation that the matter should not be pre-judged, although for the reason stated above I do not accept that the policy should convey support in principle for such developments. I propose to amend the policy accordingly.

10. However, pending the outcome of the research and public consultation on behalf of the Scottish Government, no consents will be granted for unconventional oil and gas developments in Scotland. It may be that policy CDP5 will need to be revisited when the Scottish Government publishes its conclusions at the end of that process.

11. In relation to the representation by the Coal Authority, an examination of the plan (OC55) showing the surface coal resource in Glasgow City confirms that the vast majority lies under the existing built up area, and that other areas are likely to be constrained by green belt or natural or built heritage designations, or committed community growth areas. I therefore consider that there are likely to be very few if any sites within the city boundary where opencast coal mining or surface mineral extraction could be accommodated, and see little value in amending the policy to cater for that eventuality.

12. I appreciate the desire of Scotia Gas Networks to secure the successful redevelopment of the gas holder site at Cleveden Road, but I do not consider that a specific policy is necessary to achieve that object.

#### Low and Zero Carbon Generating Technologies

13. As the council indicates, it is a statutory requirement to include a policy in the Proposed Plan which requires all developments to be designed to ensure that new buildings “*avoid a specified and rising proportion of the projected greenhouse gas emissions from their use, calculated on the basis of the approved design and plans for the specific development, through the installation and operation of low and zero-carbon generating technologies*”.

14. The alternative policy proposed by Homes for Scotland and Persimmon Homes, whereby developers should consider whether the use of low and zero-carbon technologies can contribute to more energy-efficient houses in a cost-effective way, would not meet that statutory requirement.

15. In the absence of Scottish Government advice, I can understand why the council proposes to follow the standards set out in Section 7 of the Building Standards Technical Handbook. The Technical Handbooks provide guidance on achieving the standards set in the Building (Scotland) Regulations 2014. I note the comment that these are aspirational standards which are not yet formally required by the Building Standards, and I also recognise that these standards will change over time. However, I consider that they represent the best indication of good practice to be followed.

16. I therefore do not propose to recommend the modification of that aspect of policy CDP5.

#### Supporting representations

17. I note the representations made in support of the Plan which are summarised above, but they do not raise any unresolved issues that I require to examine.

#### **Reporter’s recommendations:**

Modify the Proposed Plan by replacing the second paragraph of policy CDP5 with:

*“The council will require the potential developers of any proposals for onshore oil and gas*



*production to undertake a risk assessment to determine impacts on local communities, neighbouring uses and the environment. The assessment should identify onsite activities that pose a potential risk and explain how measures will be used to monitor, manage and mitigate any identified risks to health, amenity and the environment. The assessment should inform the identification of buffer zones to protect sensitive receptors (including population, fauna, flora, soil, water, air, climatic factors, material assets, landscape, and the interrelationship between these factors) from unacceptable risks. Where proposed distances are considered inadequate planning permission will be refused. Supplementary Guidance will set out further detail on how this is to be undertaken."*

Issue 13	Green Belt and Green Network	
Development plan reference:	Policy CDP 6 Green Belt and Green Network (Pages 43-45)	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
Muriel Pearson (00143) Wm Goodfellow (Contractors) Ltd (00413) Sportscotland (00429) Glasgow Centre for Population Health (00442) Scottish Allotments and Gardens Society (00453) Laurence King (00455) United Wholesale (Scotland) Ltd (00457) Hillhead Community Council (00479) Paddy Lyons (00484) Persimmon Homes (00497)		James Jamieson (00570) University of Strathclyde (00577) Homes for Scotland (00602) Cranhill Development Trust (00614) RSPB Scotland (00629) Strathclyde Partnership for Transport (00633) Dowanhill Hyndland and Kelvinside Community Council (00637) The Glasgow Tree Lovers' Society (00655) West Dunbartonshire Council (00806)
Provision of the development plan to which the issue relates:	Policy CDP 6 - Green Belt and Green Network, particularly its provisions in relation to: the identification and protection of open spaces and the green network; and the delivery of open space to support new development.	
Planning authority's summary of the representation(s):		
<u>Green Belt and Green Network Policy (Wording/Diagrams)</u>		
<u>Objecting</u>		
00497/2/001 Persimmon Homes - In line with the revised Scottish Planning Policy, reference should be made to a presumption in favour of sustainable development.		
00453/11/001 Scottish Allotments and Gardens Society - Seeks amendments to Policy CDP6 - policy title should be changed to Greenbelt, Green Networks and Green Spaces.		
00479/26/001 Hillhead Community Council - Objects to any reliance on green roofs in city policy. Green roofs have failed after the developer has ceased responsibility for maintaining them - this is generally a cost to the council which can ill be afforded. In addition, they were designed for Iceland where there are no trees and are unsuitable among tree covered areas.		
00479/27/003 Hillhead Community Council - Objects to the policy and proposals map, Figure 15 and policies CDP 6 and CDP 7. These do not go far enough - further measures are needed to protect corridors and other wildlife reserves. There should be a restriction on development on the borders of wildlife reserves and corridors, whether brownfield sites or not. Of particular concern are: the size of development (quantity and height); demand for amenity space and recreation; proximity to reserves and wildlife corridors - noise disturbs wildlife and a barrier area should be considered.		
00633/15/002 Strathclyde Partnership for Transport - The directing development diagram		

of policy CDP 6 does not add to the interpretation or understanding of this policy. These diagrams should sit clearly as a suite of diagrams which aid with the understanding of the Plan as a whole and the specific policy to which they relate.

### Supporting

00629/1/001 RSPB Scotland - In principle, we support the proposals for the Green Network, however, we are concerned that to date, the concept has failed to influence new developments. We believe that the proposed Community Growth Areas and their accompanying Masterplans provide an opportunity to deliver on the principles of the Green Network and Glasgow City Council must ensure that they adhere to them. We welcome the proposal to produce Supplementary Guidance on the Green Network.

00637/12/001 Dowanhill Hyndland and Kelvinside Community Council - Support this policy - very beneficial to continue this policy for the welfare of the city as a whole, and especially the West End.

00633/15/001 Strathclyde Partnership for Transport - SPT support the acknowledgement of the role that good-quality, well - linked open spaces can play in encouraging active travel.

00442/5/001 Glasgow Centre for Population Health - Pleased to see that the Plan places a strong emphasis on the integration of greenspace and the built environment. It is important to recognise this, given the considerable availability of open space within Glasgow and its known positive influence on health when it is of a good quality.

### Open Space Protection

### Objecting

00143/9/001 Muriel Pearson - Cranhill Park should be invested in and upgraded as part of the green network to assist in improving residents' health.

00429/8/001 Sportscotland - Seek changes to Glossary definition of Green Network, specifically clarification that this includes the spaces as well as the linkages. The policy protection given to open spaces in policy CDP6 is not as strong as that given to Green Network. The same level of protection should apply to both and as such it is considered that the glossary should be amended, as suggested, or the policy itself, to reflect this and provide clarity around the definition and policy protection applying to these spaces.

00429/10/003 Sportscotland - Seek change to policy CDP6. More clarity is required in relation to open space and green network definitions and the policy protection of them. We consider all open space and green networks should have a strong policy presumption against their loss. Paragraph 2 of policy CDP6 states that 'The Council will support the retention, as open space.', whereas the same paragraph states that 'Development that is likely to adversely impact on the existing Green Network will be resisted.' The same level of protection should apply to both and, as such, it is considered that either the glossary should be amended, or the policy itself.

00429/10/001 Sportscotland - Seeks a change to policy CDP6. Amend first sentence of last paragraph of policy by inserting 'and sport' after 'recreation'. Sport can be considered part of recreation but, for clarity, request specific reference to sport.

00429/10/002 Sportscotland - Seek change to policy CDP6. Reference should be made to the different national policy position in relation to certain outdoor sports areas as set out in SPP paragraph 226. This contains a strong presumption against the development of specified outdoor sports areas, and the policy position is different to general open space.

00453/15/001 Scottish Allotments and Gardens Society - The Table on page 25 of the SEA indicates that around 470ha of greenbelt land, 75ha of valuable greenspace in the urban area, and 153ha of land that could be used to enhance the greenspace and green corridors is under threat/will be lost as a result of proposals in the Plan. The Plan should save these areas. The lack of an Open Space Strategy, with associated allotment and biodiversity strategies, is slewing the plan and we risk losing land and biodiversity to development that can never be recovered. The Plan should promote denser housing on sites that have existing planning permission.

00570/1/001 James Jamieson - Amend policy CDP 6 (final sentence of second paragraph). This should be changed from 'development that is likely to adversely impact on the existing Green Network will be resisted' to 'development that is likely to adversely impact on the existing green network will not be supported'.

00614/1/001 Cranhill Development Trust - Cranhill Park is in desperate need of an upgrade and this should be prioritised in the Plan. This will enhance the health and well being of the local community and reduce youth disorder.

00655/1/001 The Glasgow Tree Lovers' Society - The Council's existing budget for 2013/4 refers to the rationalisation of the Council's property portfolio from closure or reconfiguration of depots and a review of non-core park services. This sees parks as a burden, and leaves them at risk of inappropriate development. Standards of maintenance have declined, and developers, including the Council itself, have made inroads into some parks. The new Development Plan seriously undermines previous protection for Parks and other Greenspace, by streamlining the process and replacing specific hard won policies by a very loose strategy.

00479/33/001 Hillhead Community Council - Objects to policy CDP6 as do not approve of replacing existing green space with substitutions elsewhere. Parks should be sacrosanct and not encroached on. There are issues of Common Good which should also be secure. Substitutions are never like for like. There is nothing to stop additional green space being provided by a developer, which would be in line with council policy on the greening of Glasgow.

## The River Kelvin

### Objecting

00479/1/001 Hillhead Community Council - Objects to Figure 14 of policy CDP6. West bank of River Kelvin, Otago Lane Wildlife corridor - it is impossible to see whether this is included in the map, the scale is too small. This corridor should be retained at its original width and length as a wildlife corridor, as in City Plan 2. The opposite bank is prone to flood, so this bank is a vital lifeline. Otters have been sighted and there are breeding lampreys at the site. Encroachment from development not only interrupts a corridor but also can disturb wildlife over a wider area.

00455/3/001 Laurence King - General support for policies CDP6 and CDP7 but have

concerns over their implementation in relation to the River Kelvin. The River Kelvin and its environs is a unique natural environment and requires consideration and protection within the Plan. Recent planning approvals next to the Kelvin have included no wildlife mitigation, and threaten the effectiveness of this 'Green Corridor'. There should be an effective method for monitoring the implementation of policies CDP 6 & 7, particularly with regard to the River Kelvin, and a means of encouraging or enforcing their implementation on Glasgow City Council.

#### Supporting

00637/6/001 Dowanhill Hyndland and Kelvinside Community Council - Supports the retention of the Wildlife Corridor in its current form along the River Kelvin, from Eldon Street Bridge to Great Western Road Bridge. This is essential for the welfare of the Glasgow West Conservation Area, and the Hillhead part in particular.

#### Designation of Land as Open Space

#### Objecting

00484/1/001 Paddy Lyons - Objects to the non-designation of land at 5 Southpark Avenue, G12, as green/open space. The Council had previously promised that this would be designated as Open Space.

00457/4/001 United Wholesale (Scotland) Ltd - Seeks a change to the Policy and Proposals Map to identify a site at 164-166 Maxwell Road as a 'Mixed Use' Allocation (to include, residential and retail uses) from the current Sports Areas and White Land. The site currently operates partly as a Cash and Carry depot and associated car park but also includes a former car showroom and a former Bowling Club. The former Bowling Club and club house is identified as Green Space under City Plan 2. Policy CDP 6 indicates that the Council will support the retention, as open space, of the categories of open space specified and shown on Figure 14 - The Open Space Map identifies the former bowling green as 'Sports Areas - Bowling Green'. The open space designation of the bowling green and the land to the north is restrictive. The Policy and Proposals Map should be changed to show the whole site as Mixed Use.

00577/1/001 University of Strathclyde - Seeks the identification of a site at Stepps as a development opportunity for housing. Part of the Strathclyde University recreational Area [part of which is in North Lanarkshire Council area] at Stepps is likely to become surplus to requirements during the plan period. The playing fields at Stepps are predominantly used by the University and there is little wider public access. It is the University's intention to invest and improve their remaining recreational facilities at Stepps and thus the overall level of playing capacity will be maintained. The University will be looking to cross-fund new and improved facilities at Stepps and on the City Centre John Anderson Campus through monies obtained from the redevelopment of the site. As such there will be no detrimental impact on capacity or provision.

00577/2/001 University of Strathclyde - The land at Stepps should be removed from the Green Network and identified as a potential development opportunity for housing on the following basis: Part of the recreational area at Stepps is likely to become surplus to requirements during the plan period. The future use of this land is therefore likely to change significantly and this should be considered in the LDP review. Policy CDP6 that covers the site relates to use as playing fields for the University. The relevance of this

use and therefore the allocation requires to be reconsidered.

The playing fields are predominantly used by the University and there is little, wider public access. It is the University's intention to improve their remaining recreational facilities at Stepps and thus the overall level of playing capacity will be maintained. As such there will be no detrimental impact on capacity or provision. The University will look to cross-fund new and improved facilities at Stepps and the John Anderson Campus through monies obtained from the redevelopment of the site. It is submitted that housing would be an appropriate alternative use of the site in terms of its relationship to adjacent housing.

00479/29/001 Hillhead Community Council - Objects to the non-designation of land at 5 Southpark Avenue, G12, as green/open space. There is a planning consent for green space and restoration of trees illegally felled at this site. There has been no development on the site for 150 years and it contributes to the character and appearance of the locale. No owner has managed this site properly. It is absolutely clear that the SEIRU reporter (P/PPA/260/183) considered the ground to be open, green space of immense importance to the Conservation Area. Only re-designation as green space, rather than the current DEV2 designation, will protect this space which is so valuable to the community and conservation area.

### Green Belt

#### Objecting

00413/1/001 Wm Goodfellow (Contractors) Ltd - Seeks the removal of a site at Manse Road, Bargeddie, from the Green Belt. The site has, for many years, been used for recycling activities and has a complex planning history, including an application for the recycling of inert material and site restoration works on a temporary basis, which the Council resolved to approve subject to a legal agreement. It is hoped that planning permission will be secured shortly. The site should be excluded from the Green Belt, and either be defined as a business site, or left as white land.

#### Supporting

00806/1/001 West Dunbartonshire Council - Greenbelt - support for the continuing identification and protection of the green belt to the west of the city adjoining West Dunbartonshire.

### Open Space Standards

#### Objecting

00497/2/002 Persimmon Homes - An Open Space Strategy should be produced. While the Council has produced mapping of open spaces to be protected in the plan, it then states that these will change over time. Of greater concern, it states that the detail of what will be required of developers in terms of provision of, or contributions to, open space will be set out in Supplementary Guidance. This is unacceptable. It should be clear, as a minimum, that the policy requirement in relation to open space will either be a contribution assessed on local deficiencies in access to suitable open spaces, or a contribution based on defined standards of provision. That is the critical policy requirement which must be clear in the Plan. As set out in Circular 6/2013, the precise methods of calculating the contribution can then be set out in Supplementary Guidance.

00602/1/001 Homes for Scotland - Policy CDP6 is deficient in that it does not set out the basis on which open space provision is to be assessed. The Policy should either state that open space contributions/provision will be required on the basis of deficiencies in provision arising as a consequence of new development, or that space standards derived from the Open Space Strategy will apply. The Council has yet to complete an Open Space Strategy but SPP and PAN65 expect that a development plan will be informed by an OSS. The Plan states that the detail of what will be required of developers in terms of provision of, or contributions to, open space will be set out in Supplementary Guidance. This is unacceptable. It should be clear, as a minimum, that the policy requirement in relation to open space will either be a contribution assessed on local deficiencies in access to suitable open spaces, or a contribution based on defined standards of provision.

**Modifications sought by those submitting representations:**

Green Belt and Green Network Policy

00497/2/001 Persimmon Homes - Policy CDP6 should be reworded to make reference to a presumption in favour of sustainable development.

00453/11/001 Scottish Allotments and Gardens Society - Policy CDP6 should be retitled as 'Greenbelt, Green Networks and Green Spaces'.

00479/26/001 Hillhead Community Council - The City Development Plan should not promote the use of green roofs.

00479/27/003 Hillhead Community Council - Policy CDP6 should be reworded to include further measures to protect wildlife corridors and other wildlife reserves.

00633/15/002 Strathclyde Partnership for Transport - Review the directing development diagram of policy CDP 6 to ensure it is conveying the intended message. As a minimum the shading in the top layer should not obliterate the plan underneath and should also be labelled.

Open Space Protection

00143/9/001 Muriel Pearson - Amend the Green Belt and Green Network Background Paper to indicate that Cranhill Park should be invested in and upgraded as part of the green network.

00429/8/001 Sportscotland - The Glossary definition of Green Network should be reworded to clarify that it includes the spaces as well as the linkages.

00429/10/003 Sportscotland - Policy CDP6 should be reworded to provide more clarity in relation to open space and green network definitions and the policy protection of them.

00429/10/001 Sportscotland - Policy CDP6 should be reworded to make reference to sport as one of the multitude of functions which the green network will be expected to provide for.

00429/10/002 Sportscotland - Policy CDP6 should be reworded to make reference to the different national policy position in relation to certain outdoor sports areas (SPP para

226).

00453/15/001 Scottish Allotments and Gardens Society - Amend the City Development Plan to remove housing proposals on land that is in Green Belt, is open space or could be used to enhance greenspace and green corridors.

00570/1/001 James Jamieson - Policy CDP6 should be reworded: the final sentence of second paragraph should be changed from 'development that is likely to adversely impact on the existing Green Network will be resisted' to 'development that is likely to adversely impact on the existing green network will not be supported'.

00614/1/001 Cranhill Development Trust - The Plan should prioritise the upgrade of Cranhill Park.

00655/1/001 The Glasgow Tree Lovers' Society - The City Development Plan should include specific policies to protect open space, particularly parks.

00479/33/001 Hillhead Community Council - Policy CDP6 should be reworded to state that existing green space should not be replaced with substitutions elsewhere.

#### The River Kelvin

00479/1/001 Hillhead Community Council - Amend Figure 14 of policy CDP6 to provide a better scale of map, and to illustrate the extent of the River Kelvin wildlife corridor at Otago Lane.

00455/3/001 Laurence King - City Development Plan should include an effective method for monitoring the implementation of policies CDP 6 & 7, particularly with regard to the River Kelvin, and a means of encouraging or enforcing their implementation on Glasgow City Council.

#### Designation of Land as Open Space

00484/1/001 Paddy Lyons - The City Development Plan should designate the site at 5 Southpark Avenue G12 as green/open space.

00457/4/001 United Wholesale (Scotland) Ltd - Amend the Policy and Proposals Map to identify the site at 164-166 Maxwell Road as 'Mixed Use' (to include residential and retail uses).

00577/1/001 University of Strathclyde - The City Development Plan should identify part of the Strathclyde University recreational area at Stepps as a development opportunity for housing.

00577/2/001 University of Strathclyde - The land at Millerston Playing Fields, Stepps should be removed from the Green Network and identified as a potential development opportunity for housing in the City Development Plan.

00479/29/001 Hillhead Community Council - The City Development Plan should designate the site at 5 Southpark Avenue G12 as green/open space.



Green Belt

00413/1/001 Wm Goodfellow (Contractors) Ltd - Removal of a site at Manse Road, Bargeddie, from the Green Belt. The site should either be defined as a business site, or left as white land.

Open Space Standards

00497/2/002 Persimmon Homes - Policy CDP6 should be reworded to set out the policy requirement in relation to open space, in the form of either a contribution assessed on local deficiencies in access to suitable open spaces, or a contribution based on defined standards of provision.

00602/1/001 Homes for Scotland - Policy CDP6 should be reworded to set out the policy requirement in relation to open space, in the form of either a contribution assessed on local deficiencies in access to suitable open spaces, or a contribution based on defined standards of provision.

**Summary of responses (including reasons) by planning authority:**Green Belt and Green Network Policy (Wording/Diagrams)Objecting

00497/2/001 Persimmon Homes - It is not considered necessary for the Plan to refer to the presumption in favour of sustainable development, as this is set out explicitly in Scottish Planning Policy, including a detailed explanation of what this means for policies and decisions (*CE2*, paragraphs 28 and 29). The development of a compact city form to support sustainable development is one of the two key aims of the Plan.

No modifications recommended.

00453/11/001 Scottish Allotments and Gardens Society - The Glossary to The Plan indicates that the Green Network is what is delivered when individual open spaces are linked together to provide multi-functional benefits. As such, any individual open space is considered to be part of the Green Network. This message is re-affirmed in policy CDP6, which indicates that the Council will support the retention, as open space, of the categories of open space shown on Figure 14, together with the Green Belt and those spaces protected through policy CDP7 (LNRs, SINCs, SSSIs, etc.) as the core elements and links in the Green Network.

The policy also intimates that, in addition to the above, there are other smaller-scale green infrastructure elements in the Green Network. As such, it is considered clear that the Green Network includes open spaces and smaller green spaces, and that there is no need to change the title of the policy.

No modifications recommended.

00479/26/001 Hillhead Community Council - The Plan makes only one mention of green roofs, in the context to Policy CDP6, referring to the role they can play as a small scale element in the green network. However, in the right circumstances, they are considered to have great potential to help deliver many of the objectives of The Plan. The Scottish

Government publication 'Green Infrastructure - Design and Placemaking' (OC40) sets out the benefits of green roofs as a component of green infrastructure. Amongst other things, it indicates that they:

- can provide and connect habitats for birds and insects, creating ecological corridors (page 2);
- can help absorb rainfall and mitigate against flooding (page 2);
- can provide enhanced insulation, saving energy costs in summer and winter (page 16);
- can be used as a functional space for outdoor living, including as roof gardens and for communal growing (page 2).

The Council is proposing to bring forward Supplementary Guidance to support policies CDP6 and 7 and provide further advice on when green roofs could be beneficially incorporated into new developments. The draft Water Environment Supplementary Guidance (OC66, Table 2) provides guidance on the role they can play in delivering SUDs.

No modifications recommended.

00479/27/003 Hillhead Community Council - Policy CDP7 indicates that the Council will bring forward Supplementary Guidance to support this policy that will set out the detailed boundaries of designated landscape and nature conservation sites. The policy will protect the sites shown in the Supplementary Guidance. The policy indicates that new development should not have an unacceptable effect, either directly, indirectly or cumulatively on these sites, and the Supplementary Guidance will provide further advice on how this will be done. This should ensure that development proposals in the areas immediately adjacent to the sites will not have an unacceptable impact on them. However, the Plan does not impose a restriction on development on the border of such sites as this would be contrary to Scottish Planning Policy (CE2, paragraph 196), which states that buffer zones should not be established around areas designated for their natural heritage importance.

The Policy and Proposals Map is intended to illustrate the plan's policies and proposals spatially and allow the specific location of proposals to be accurately identified. Existing designations are not proposals. Whilst they are the subject of policies, it is considered that it is not practical to show them on the Policy and Proposals Map because:

- some of the sites (including TPOs, LNRs, SSSIs, etc.) are not designated through the development plan process and the Map could quickly become out of date; and
- there are a large number of such sites in Glasgow, sometimes overlapping – this would be difficult to illustrate clearly on a Policy and Proposals Map which also shows policies and proposals.

No modifications recommended.

00633/15/002 Strathclyde Partnership for Transport - There are a number of 'Directing Development' diagrams in the Plan. These diagrams were intended to broadly indicate the key spatial implications for a particular policy area, at a City-wide level, and relate this to the Plan's Spatial Strategy. The diagrams are for illustrative purposes only. It is agreed that the existing diagrams in CDP5, CDP6, CDP8 and CDP9 require further refinement and amendment.

The Reporter could, if so minded, agree to the amendment of the suite of Directing

Development diagrams within CDP5, CDP6, CDP8 and CDP9 to better illustrate the key spatial implications for that particular policy area. This will involve the addition of a key and/or a short descriptive narrative which explains each diagram and either the removal or fading out of the (Spatial Strategy) background layer. In addition, consideration will be given to extending the suite of diagrams to include similar diagrams for Policies CDP3, CDP4, CDP7 and CDP11. Diagrams of this nature are not required for Policies CDP1 or CDP12. Figure 9 (CDP2) is not considered to require amendment as it already fulfils its purpose of providing an indicative illustration of the spatial strategy and scope of Policy CDP2.

Such changes should bring greater clarity and help the reader to better understand the individual spatial implications of each of the policies in the Plan.

#### Supporting

00629/1/001 RSPB Scotland, 00637/12/001 Dowanhill Hyndland and Kelvinside Community Council, 00633/15/001 Strathclyde Partnership for Transport, 00442/5/001 Glasgow Centre for Population Health - Noted.

No modifications recommended.

#### Open Space Protection

#### Objecting

00143/9/001 Muriel Pearson, 00614/1/001 Cranhill Development Trust - Cranhill Park is categorised on the Council's Open Space Map as 'Parks and Gardens' (OC47). Whilst the Plan itself does not identify open spaces, Policy CDP6 states that the plan will support the retention, as open space, of certain categories of open space shown on the Open Space Map, and listed on Figure 14 of the Plan. Policy CDP6 indicates that these open space categories form some of the core elements and links in the Green Network, and that development that is likely to impact on the Green Network will be resisted unless it includes appropriate mitigation.

Work to produce an Open Space Strategy for the City is examining the quality of the most usable categories of open space, including Parks and Gardens. This data will help inform where improvements in open space quality are required, around the City, to help meet quality standards. This will help inform the Council's operational priorities in relation to investment in Parks and Open Spaces, and may also indicate where development in areas surrounding poor quality open spaces may need to contribute to bringing those spaces up to an appropriate standard, in line with Policy CDP6. However, whilst the policies of the Plan safeguard the park from inappropriate development, the Plan is not the place to set out detailed operational considerations regarding investment in the Council's open space resource.

No modifications recommended.

00429/8/001, 00429/10/003 Sportscotland - The Glossary to the Plan indicates that the Green Network is what is delivered when individual open spaces are linked together to provide multi-functional benefits. As such, any individual open space is considered to be part of the Green Network. This message is re-affirmed in policy CDP6, which indicates that the Council will support the retention, as open space, of the categories of open space

shown on Figure 14, together with the Green Belt and those spaces protected through policy CDP7 (LNRs, SINCS, SSSIs, etc.) as the core elements and links in the Green Network.

As open spaces are part of the Green Network, development that is likely to adversely impact on them will be resisted. As such, open space and the green network are accorded equal protection in the Plan.

See also response to objection 00570/1/001.

No modifications recommended.

00429/10/001 Sportscotland - The first sentence of the last paragraph of policy CDP6 provides examples of some of the functions which the Green network should provide for, 'including an integrated habitat network; climate change adaptation; amenity; setting; active travel; recreation; and water management ...'. It is not intended to be an exhaustive list of the functions that the green network can provide and, as the objector has indicated, sport can be considered as part of recreation.

The Reporter could, if so minded, amend the first sentence of the last paragraph of policy CDP6 could be amended by inserting the words 'and sport' after 'recreation'. This would provide further clarity to the policy.

00429/10/002 Sportscotland - Policy CDP 6 states: 'The Council will support the retention, as open space, of the categories of open space specified and shown in Figure 14 (and identified on the Council's Open Space Map)'. Figure 14 explicitly notes sports areas as a PAN 65 Open Space Category protected by this policy. This is per the definition of 'Types of Open Space' which can be found in PAN 65 (CE4, Table 1 (Page 5)).

SPP (CE2, paragraph 226) states that outdoor sports facilities should be safeguarded from development except in certain specified circumstances, including mitigation for the loss of the type of space in question. Policy CDP6 indicates that the Council will produce supplementary guidance to support this policy and that the Council will resist development on the green network unless appropriate mitigation is included. The SG will provide further guidance on mitigation, including how paragraph 226 should be applied, how and where compensatory provision for the loss of sports pitches should be made, etc. It is considered that this is a level of detail which is best addressed in Supplementary Guidance, and not the Plan itself.

No modifications recommended.

00453/15/001 Scottish Allotments and Gardens Society - The objector has produced a table to illustrate how these figures have been calculated, based on the SEA of the Proposed Plan. However, that table is misleading as it includes, amongst other things:

- sites which were SEA'd at earlier stages in the plan process and have not been taken forward into the Proposed Plan (143ha);
- a further large site at Cardowan (56.6 has), only a small part of which is identified for development in the Plan;
- duplication – it includes both the site area of the Summerston Feasibility Study (242.91 ha) and the smaller area identified within it where development may be acceptable depending on the outcomes of the Study (90.23 ha). The larger area should be discounted and to what extent, if any, development can take place in the smaller area

has yet to be established;

- four hospital sites identified for masterplanning work (15 ha) to identify future development opportunities – these areas are currently developed and the delivery of green infrastructure/open space will be a key aim of the masterplanning;
- four sites (over 40ha in total) which are designated economic development areas and characterised by warehousing, railway sidings or other built forms.

There are a number of demands on land in the City, including for housing, jobs and community uses. The Plan has identified a housing land supply which is intended to address the Scottish Government's requirement to provide a generous effective land supply. It is predominantly a brownfield land supply, but includes provision for some limited Green Belt release (three small sites) and for a feasibility study of an area of land to the north of Summerston to assess the potential for additional land supply at that location. The Plan also recognises the Community Growth Areas and previous land release established in previous Plans. The remaining sites are within the urban area with the vast majority being on brownfield land. It is not considered possible, or desirable, to safeguard all land in the City for open space alone, when use of the effective brownfield housing land supply would increase the pressure for additional greenfield release to address the need to provide a generous effective land supply, as required by SPP (CE2, para 110).

Policy CDP6 indicates that standards for the provision of open space in new development will be brought forward through the Council's Open Space Strategy. Planning Advice Note 65 (CE4, para 29) indicates that the Council should take a demand led approach to the provision of allotments and growing spaces. The Council is starting work to refresh its Allotments/Food Growing Strategy and this will include a review of the demand for allotments/growing spaces, both in terms of quantity, quality and geography. Land needed to help meet this demand will be identified on the Open Space Map and will benefit from protection under Policy CDP6. This will help ensure there is an appropriate amount of open space, including growing space, in the City.

No modifications recommended.

00570/1/001 James Jamieson - The objection would appear to suggest that the phrase 'development that is likely to adversely impact on the existing Green Network will be resisted' is a weaker statement than 'development that is likely to adversely impact on the existing green network will not be supported'. It is considered that the phrase used in the policy ('will be resisted') states a strong presumption against development of the green network. Nevertheless, it may bring clarity if the wording of this part of the policy matches the language used in the first paragraph of the policy, with reference to the Green Belt.

The Reporter could, if so minded, amend the wording of the last sentence of paragraph 2 of the policy to read 'development that is likely to adversely impact on the existing Green Network will not be supported unless it includes appropriate mitigation, as detailed in associated Supplementary Guidance'.

00655/1/001 The Glasgow Tree Lovers' Society - Policy CDP 6 states that the Council will support the retention, as open space, of the categories of open space specified and shown on Figure 14. Figure 14 identifies public parks and gardens as being one of the PAN 65 Open Space Categories protected by the policy. All of the City's public parks are identified as a 'public park and garden' on the PAN 65 map, ensuring they are protected as such.

The Council is proposing to bring forward Supplementary Guidance to support policy CDP6 and provide further advice on the assessment of proposals for development in parks. It is the intention that this will reflect the general policy position in City Plan 2 (CE17, Part 3, Policy ENV 1, page 238) that ‘the potential for the development of commercial facilities (e.g. Cafes and restaurants) in parks may be considered where such uses will contribute to improved customer services and increased park usage. This will require developers to consult with local communities. Such proposals, where appropriate in terms of the nature of the park and their impact upon it, should be set within the context of a Park Management Plan.’

No modifications recommended.

00479/33/001 Hillhead Community Council - SPP (CE2, paragraph 220) states that planning should protect, enhance and promote green infrastructure, including open space and green networks, as an integral component of successful placemaking. The Plan protects open space, as part of the Green Network, via policy CDP 6. It also states that development that is likely to adversely impact on the existing Green Network will be resisted unless it includes appropriate mitigation, to be detailed in associated Supplementary Guidance.

This reflects the fact that decisions on planning applications sometimes aren’t made on the basis of the Plan alone, and that, on occasion, there may be other material considerations which mean that development on open space will receive planning permission. Moreover, when some areas are being redeveloped, there can be benefits in ‘re-arranging’ the distribution of open spaces, as part of a placemaking approach, to ensure better access to a better quality open space resource. Such an approach recognises that development on existing open spaces would be acceptable as long as appropriate mitigation, in the form of better located/quality open space, was provided. The Council is proposing to bring forward Supplementary Guidance to support policy CDP6 and provide advice on what mitigation should be provided and when. This will take into account the open space standards being developed through the Open Space Strategy.

No modifications recommended.

### The River Kelvin

#### Objecting

00479/1/001 Hillhead Community Council, 00455/3/001 Laurence King - Policy CDP6 seeks to protect the Green Network and indicates that the Council will support the retention of those spaces protected through Policy CDP 7: Natural Environment (see Figure 15), as its core elements and links. CDP7 indicates that Figure 15 illustrates the extent of designated landscape and nature conservation Sites, but that Supplementary Guidance will set out the detailed boundaries. This will map sites (including green corridors) at a much clearer scale and will provide the clarity required, clarity that cannot be easily provided in the Plan itself.

CDP5 indicates that the Supplementary Guidance will, in due course, require to be refreshed to reflect a proposed review of existing site boundaries and justifications. This review is intended to meet the SPP (CE2) requirement to provide a justification for local sites designated for their nature conservation or landscape interests, but will also reflect

where there may have been changes in site-specific circumstances (such as a new development) which would suggest that a redefinition of the boundaries of some designations may be appropriate. It is not clear, at this stage, whether this will result in a Green Corridor boundary that is different from that in City Plan 2 (CE17).

Regarding objection 00455/3/001, it is not possible to 'enforce' policy to ensure no development takes place on Green Corridors. Planning legislation requires decisions on planning applications to be made in accordance with the development plan unless material considerations indicate otherwise. Specific material considerations may mean an incursion into a green corridor could be justified in certain circumstances. This is a matter for development management and not the development plan.

No modifications recommended.

#### Supporting

00637/6/001 Dowanhill Hyndland and Kelvinside Community Council - Noted.

No modifications recommended.

#### Designation of Land as Open Space

#### Objecting

00484/1/001 Paddy Lyons, 00479/29/001 Hillhead Community Council - Whilst City Plan 2 identified open space on its Development Policy Principles Maps, the Proposed Plan does not follow the same approach. Instead, Policy CDP6 states that the plan will support the retention, as open space, of certain categories of open space shown on the Open Space Map, and listed on Figure 14 of the Plan.

With the exception of the strip of land between the boundary wall and the pavement on Southpark Avenue (amenity greenspace), this site is not currently shown as Open Space on the Council's Open Space Map (OC86). However, given the planning history of the site, including a recent planning permission (OC87) for its use as a community garden, it is considered that it should be identified as open space on the Open Space Map, affording it protection by Policy CDP6. This matter will be addressed by updating the Open Space Map at the next available opportunity, with the site to be shown as category 6.24 Communal Gardens.

No modifications recommended.

00457/4/001 United Wholesale (Scotland) Ltd - This objection relates to a site bounded by McCulloch Street, Maxwell Road and St Andrew's Road in the Pollokshields Area of Glasgow. In the western half of the site there is a bowling green. The two greens and the space around the Club House are shown as Sports Areas on the Council's Open Space Map (OC88). The greens, club house and associated space fall within the East Pollokshields Conservation Area.

Whilst City Plan 2 (CE17) provides for mixed use designations on certain sites, the Policy and Proposals Map (PPM) for the Proposed Plan does not follow the same approach. Instead, the PPM shows specific areas of the City affected by some policies (including Conservation Areas), but indicates that certain policies apply city-wide, these being CDP1

- the Placemaking Principle and CDP2 - Sustainable Spatial Strategy. Unlike City Plan 2, the Plan does not provide for mixed use designations.

The Proposed Plan itself does not identify open spaces, but Policy CDP6 states that the plan will support the retention, as open space, of certain categories of open space shown on the Open Space Map, and listed on Figure 14 of the Plan.

As such, it is not considered possible to reflect the objector's aspirations for the site within the Plan itself by showing the site as mixed use or by removing the open space designation, even if this was considered desirable. Instead, any development proposals for the site would require to be assessed against the policies of the plan, principally CDP1, CDP2, CDP6 and CDP9 (with regard to the Conservation Area designation), and associated Supplementary Guidance. It would require the objector to justify any proposal affecting the bowling green against the criteria set out in SPP (CE2) paragraph 226 (for development on sports pitches). It is considered that no such justification has been made, as yet.

No modifications recommended.

00577/1/001, 00577/2/001 University of Strathclyde - These objections relate to playing fields, and surrounding land, at Stepps, on the City boundary with North Lanarkshire Council. A part of the area on the eastern edge of the identified site lies within North Lanarkshire. The playing fields are owned and utilised by Strathclyde University, and are identified as 'Sports Areas' on the Council's Open Space Map (OC89a and OC89b), with a part of the surrounding area being identified as 'Green Corridor.'

The Proposed Plan itself does not identify open spaces, but Policy CDP6 states that the plan will support the retention, as open space, of certain categories of open space shown on the Open Space Map, and listed on Figure 14 of the Plan. Policy CDP6 indicates that these open space categories form some of the core elements and links in the Green Network, and that development that is likely to impact on the Green Network will be resisted unless it includes appropriate mitigation.

The Council will bring forward Supplementary Guidance to support this policy, to include guidance on how this assessment would be undertaken. In this instance, assessment would require to include consideration against the criteria, set out in SPP (CE2) paragraph 226, for development on sports pitches. Whilst the objector intimates that it is the University's intention to improve the remaining pitches at Stepps and invest in new facilities in the City Centre from the potential proceeds from this site, no detail has been provided which would allow a full consideration of the proposal against SPP paragraph 226. Identifying the site for housing in the Plan could jeopardise the ability to secure compensatory provision for development of the site, should that be acceptable. Such considerations are better made through a planning application.

No modifications recommended.

### Green Belt

### Objecting

00413/1/001 Wm Goodfellow (Contractors) Ltd – This site sits in the green belt to the south east of Easterhouse, between the M8 and M73 motorways. No planning



permission for the storage of inert materials exists. An application for a Certificate of Existing Lawful Use (OC26) for the deposition, storage, processing and recycling of waste or surplus building materials was considered in 2012. The Report of Handling (OC27) indicates that the site has not been used continuously occupied, with the evidence being based on photographs, correspondence and SEPA records. The application was refused on the basis that the evidence submitted did not prove that the use was lawful. This position was supported by a site visit in March 2015 which suggested that the site was not being actively used at present (OC28).

A planning application for the site has been submitted and, as suggested by the objector, the Council has resolved to approve this application, pending the signing of a legal agreement (OC29). However, the report on the planning application makes it clear that the use would be a time-limited temporary one with the legal agreement being for site restoration works (planting and landscaping) to ensure the appearance of the site is commensurate with its Green Belt location. The report also makes clear (page 5) that “the proposed use would not normally be acceptable in a Green Belt location; if the site were not currently vacant and unsightly and the proposal did not include restoration works, the application would not have been encouraged”.

Planning permission would not, therefore, support removal of this site from the Green Belt.

Paragraph 51 of SPP (CE2) indicates that local development plans should show the detailed boundary of the green belt, giving consideration to, amongst other things, excluding major businesses and industrial operations. Whilst SPP doesn't define what scale or type of development might constitute a major business or industrial operation, the scale of this site, its temporary nature and the relative lack of activity on it, suggests that it does not warrant removal from the Green Belt.

No modifications recommended.

#### Supporting

00806/1/001 West Dunbartonshire Council - Noted.

No modifications recommended.

#### Open Space Standards

#### Objecting

00497/2/002 Persimmon Homes, 00602/1/001 Homes for Scotland - City Plan 2 (CE17, policy ENV2 - Open Space and Public Realm Provision) sets out a requirement that new residential development will be required to provide access to good quality recreational open space in accordance with the standards set out in the policy. At the City Plan 2 Local Plan Inquiry, the Reporter approved the standards, but recognised that the open standards should be reviewed in the context of the open space strategy. As such, she modified the draft policy ENV2 by the insertion of the following:

‘These are interim requirements subject to review, through the council's open space strategy, which is being prepared in accordance with SPP 11. Once complete the open space strategy will be a material consideration and will inform any future review of the

plan.’

Since City Plan 2 was adopted, work has been on-going to bring forward an Open Space Strategy for Glasgow, including a quality assessment of over 1000 of the most usable open spaces in the City and analysis of the accessibility of these sites from the surrounding communities. Unfortunately, this work was not completed in time to incorporate the resulting standards into the Plan. However, the work is now nearing completion and it is anticipated that it will lead to the production of a draft OSS, including new standards, by the autumn of 2015. The standards will be subject to consultation through the OSS itself and will also be brought forward in Supplementary Guidance, as stated in policy CDP6. As such, by Plan adoption, Open Space standards which reflect local circumstances and quantity, quality and accessibility considerations will be in place.

Policy CDP6 states that ‘the standards will aim to deliver enhancements to the Green Network, in terms of its quality (including multifunctionality), accessibility and quantity (as appropriate)’ and also indicates that, where applicable, meeting the standards in new development ‘will require assessment against Policy CDP12’. Policy CDP12 sets out further detail, indicating that the developers will be required to make specific provision relating to the proposed development to address quantitative or qualitative deficiencies in open space provision or access to open space, according to the standards and priorities identified by the OSS.

Including the standards in SG would accord with the Scottish Government’s expectations, as set out in its response to the MIR (OC33, paragraph 52), that ‘we expect local development plans or supplementary guidance to set out specific requirements for the provision of open space as part of new development and make clear how much, of what type and quality and what the accessibility requirements are’.

The Reporter could, if so minded, amend policy CDP6 by adding text to the end of the third paragraph of the policy, to read: ‘The contributions which may be sought from new development will reflect any requirements based on application of quality, quantity and accessibility standards, and identified local circumstances, as set out in the Open Space Strategy.’ This would help bring clarity both to the policy and to its relationship with the standards being developed through the Open Space Strategy.

### **Reporter’s conclusions:**

#### Green Belt and Green Network Policy (Wording/Diagrams)

1. Scottish Planning Policy (SPP), issued in June 2014, introduced a presumption in favour of development that contributes to sustainable development (‘the presumption’), and gave guidance on its application. Paragraph 28 explains that the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place, and not to allow development at any cost.
2. Paragraph 30 of SPP advises that development plans should:
  - be consistent with the policies set out in this SPP, including the presumption in favour of development that contributes to sustainable development;
  - positively seek opportunities to meet the development needs of the plan area in a way which is flexible enough to adapt to changing circumstances over time;

- support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area;
- be up-to-date, place-based and enabling with a spatial strategy that is implemented through policies and proposals; and
- set out a spatial strategy which is both sustainable and deliverable, providing confidence to stakeholders that the outcomes can be achieved.

3. SPP does not require development plans to make specific reference to the presumption, but it does expect development plans to be consistent with it. I am satisfied that the strategic outcomes of the Proposed Plan, which include ‘a vibrant place with a growing economy’ and ‘a thriving and sustainable place to live and work’, together with the Sustainable Spatial Strategy and subject policies including Policy CDP3: Economic Development, are generally consistent with the relevant policies in SPP, including the presumption.

4. I therefore see no need to include a specific reference in Policy CDP6: Green Belt and Green Network to the presumption in favour of development that contributes to sustainable development.

5. Figure 14 of the Proposed Plan makes clear that policy CDP6 protects a number of open space categories, including public parks and gardens, communal private gardens, and allotments, so it is not necessary to amend the title of the policy to include specific reference to ‘green spaces’.

6. Nor would it be appropriate to remove the reference to ‘green roofs’ in the supporting text. Green roofs are promoted in Scottish Government policy guidance for their role in improving insulation, providing wildlife habitats, preventing flooding and enabling outdoor living. The council proposes to bring forward Supplementary Guidance which will give further advice on their applicability to different circumstances.

7. With reference to the objection from Hillhead Community Council, I note that green corridors are one category of open space which is protected under policy CDP6. Policy CDP7 protects sites, habitats, species or ecosystems protected by law or designated as important for their nature conservation value. In that context Figure 15 shows the locations of green corridors, SINCs, local nature reserves, SSSIs, Tree Preservation Orders and Ancient and Semi-Natural Woodland. It is impractical to show all of these designations on the Proposals Map, and I am satisfied that the issue raised by the community council can be appropriately addressed in supplementary guidance where the site boundaries can be shown and further advice given on the best way of ensuring development does not damage or detract from these important areas.

8. I share Strathclyde Partnership for Transport’s concern that the diagram at page 44 entitled ‘Directing Development in relation to the Green Network and the Green Belt’ is cluttered, unclear and unhelpful. I accept that this diagram and those associated with policies CDP5, CDP8 and CDP9 are intended for illustrative purposes only, but I agree that they should be amended as the council now suggests.

#### Open Space Protection

9. I can well understand the concern of the local community to secure an early upgrade of Cranhill Park, so that it regains its former status as an area where residents of all ages

can safely relax or play games and sports. However, the local development plan is a land use document and not a schedule of investment priorities. Cranhill Park is identified on the council's open space map, and is thereby safeguarded by the terms of policy CDP6 which states that the council will protect the categories of open space (including public parks and gardens) illustrated in Figure 15. It will be a matter for the council through the Open Space Strategy to set its priorities for investment on open spaces within the City.

10. I have no doubt that the council intends to give the same protection to open spaces which it gives to green networks, but I agree with sportscotland that this is not clear from the glossary definition of 'green network' which appears to focus on the linking together of open spaces, rather than the open spaces themselves. I consider that the appropriate response is to amend the policy to say: "Development that is likely to adversely impact *on open spaces identified on the Council's Open Space Map and/or on the existing Green Network* will be resisted unless..".

11. I also agree that the policy would be clearer if it was amended to make specific reference to 'sport' as well as 'recreation'. However, I accept that 'sports areas' are listed as one of the categories of open space which are protected under the terms of policy CDP6, and see no need to expand the policy to address the national policy position on the development of specified sports areas. Further detail can appropriately be given on the matter in Supplementary Guidance.

12. I appreciate the concern about the loss of greenspace in the City expressed in particular by the Scottish Allotments and Gardens Society. However, the extent of the areas under threat is substantially less than they fear, as their total includes sites not taken forward into the Proposed Plan, some areas which are already developed, certain brownfield sites, and an extensive area of land at Summerston which is not proposed for development in the Proposed Plan. Other sites are already committed for development from previous development plans.

13. Even so, if the council is to meet its responsibility to provide sufficient land for housing, employment, community facilities and other key land uses, it will be necessary to make best use of brownfield sites within the urban area supplemented by appropriate greenfield sites on the urban edge. Against that background it is not possible to safeguard all undeveloped sites as greenspace. I am satisfied that policy CDP6, which supports the retention of open space in the City, together with the council's Open Space Strategy and Allotments/Food Growing Strategy, will provide an adequate basis to protect identified areas of open space and allotments.

14. It is suggested that the final sentence of the second paragraph of policy CDP6 should be amended from "development that is likely to adversely impact on the existing Green Network will be resisted" to "*development that is likely to adversely impact on the existing green network will not be supported*". I agree that the suggested change would improve the internal consistency of the policy, and I therefore recommend the modification below.

15. I note the fear that the council's budget changes leave parks poorly maintained and vulnerable to development. However, as I have already indicated I am satisfied that policy CDP6, together with the associated Supplementary Guidance and the council's Open Space Strategy, will provide an adequate framework to protect parks from inappropriate development. CDP6 explicitly supports the retention of public parks as open space. I therefore see no need to strengthen the policy, as suggested by the Glasgow Tree Lovers' Society.

16. I do not agree with Hillhead Community Council that policy CDP6 requires to be reworded to indicate that parks and open spaces should be sacrosanct and never encroached upon. There may be occasions when it is beneficial to add a new facility within a park or open space or, exceptionally, when it is appropriate to allow a development on an unattractive or underused open space in return for the provision of a better open space nearby. I consider that a policy in such rigid terms would unduly fetter the council as planning authority when balancing the positive and negative impacts of a proposal. I conclude that the policy strikes the right balance in that regard. It will be a matter for Supplementary Guidance to give detailed advice on what mitigation is required and in which circumstances.

#### The River Kelvin

17. Figure 14: Policy Context Diagram is illustrative only, and the council intends to show detailed boundaries of the River Kelvin wildlife corridor in Supplementary Guidance. Green corridors are protected under the terms of policies CDP6 and CDP7, but it would be unrealistic and inappropriate to resist all developments within such areas regardless of the mitigation proposed. Once again I consider that policy CDP6 strikes the right balance between protection and the need to appraise the potential impacts of proposed developments and any mitigation measures offered.

#### Designation of Land as Open Space

18. The Proposed Plan does not show open spaces on the Proposals Map. However, I note that the council proposes to identify the land at 5 Southpark Avenue as open space (communal gardens) on the Open Space Map, to reflect the planning permission granted in 2013 for the use of the vacant site as a community garden. This designation will afford the land the protection of policy CDP6.

19. I note the apparent local support for the suggested re-designation of the former bowling green at Maxwell Road and adjoining land from open space to mixed use. However, the Proposed Plan does not show open space on the Proposals Map; nor does it allocate land for mixed use purposes. It will be a matter for the council's review of the Open Space Map to consider whether the open space designation should be removed, at which time it will be open to the owners to justify why the land should no longer be safeguarded for that purpose.

20. Similarly, the site at Stepps is part of the Strathclyde University playing fields which are identified as 'sports areas' on the council's Open Space Map. The Proposals Map does not show open space. I agree with the council that the appropriate time to consider whether this area should be developed would be when a planning application is submitted which could examine whether there is a continuing need for the facility, what alternative provision is to be made, and what development if any would be appropriate on the land. At that time the council would be able to ensure that compensatory provision was made, if any permission were to be granted.

#### Green Belt

21. The site within the green belt at Manse Road, Bargeddie has been used for recycling purposes, but there is no planning permission for the business and currently no activity on site. An application for a Certificate of Existing Lawful Use was refused and dismissed on appeal. Even if planning permission is granted it is likely to be on a temporary basis only,

with undertakings that the land be restored to a condition appropriate to the location of the land in the green belt. I can therefore see no justification to remove this area from the green belt, as it forms an integral part of the green belt to the north of the intersection of the M8 and M73 motorways.

### Open Space Standards

22. I have some sympathy with the criticism of Homes for Scotland and Persimmon Homes that the development plan should have been informed by the Open Space Strategy, whereas the council has yet to complete such a strategy. As a result, the Proposed Plan is unable to specify what contribution developers will be expected to make to the provision of open space. That matter has been left to be resolved in Supplementary Guidance.

23. Work on the Open Space Strategy, which involved the assessment of over 1000 open spaces is now at an advanced stage, and the resulting standards will be incorporated in Supplementary Guidance. Whilst not ideal, this arrangement appears consistent with the advice from the Scottish Government referred to by the council, and on balance I agree with the council that its suggested modification would help to clarify policy CDP6 and its relationship with the standards being developed through the Open Space Strategy.

### Supporting representations

24. I note the representations made in support of the Proposed Plan which are summarised above, but they do not raise any unresolved issues which I require to examine.

### **Reporter's recommendations:**

Modify the suite of Directing Development diagrams within CDP5, CDP6, CDP8 and CDP9 to better illustrate the key spatial implications for that particular policy area, by adding a key and/or a short descriptive narrative which explains each diagram and removing or fading out the (Spatial Strategy) background layer.

Modify the last sentence of paragraph 2 of Policy CDP6 to read "*Development that is likely to adversely impact on open spaces identified on the Council's Open Space Map and/or on the existing Green Network will not be supported unless it includes appropriate mitigation, as detailed in associated Supplementary Guidance.*"

Modify Policy CDP6 by adding text to the end of the third paragraph of the policy, to read: "*The contributions which may be sought from new development will reflect any requirements based on application of quality, quantity and accessibility standards, and identified local circumstances, as set out in the Open Space Strategy.*"

Modify the first sentence of the final paragraph of Policy CDP6 to refer to "*recreation and sport.*"

Issue 14	Natural Environment	
Development plan reference:	Policy CDP7 Natural Environment (Pages 46-47) Figure 15 (Page 46) Action Programme Policy and Proposals Map	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
Hillhead Community Council (00479) Persimmon Homes (00497) Forestry Commission Scotland (00535) James Jamieson (00570) Jim Craig (00571) Scottish Natural Heritage (00574) Strathclyde Geoconservation Group (00589)		The Geological Society of Glasgow (00593) Scottish Canals (00611) Scottish Government (00621) RSPB Scotland (00629) Partick Thistle Football Club (00635) Dowanhill Hyndland and Kelvinside Community Council (00637)
Provision of the development plan to which the issue relates:	Policy CDP 7 - Natural Environment, particularly its provisions in relation to: the identification of sites designated as important for their nature conservation, landscape or geodiversity interest; how these sites are protected; and how adverse impacts on them can be mitigated.	
Planning authority's summary of the representation(s):		
<u>Natural Environment Policy Wording</u>  <u>Objecting</u>  00574/6/001 Scottish Natural Heritage - Policy CDP 7 should be amended to include additional text at the end of paragraph 2: 'Supplementary Guidance will provide further information on the level of protection afforded under each natural heritage designation within Glasgow and detail on the assessment of impact'. Whilst the Natural Environment Policy states, in broad terms, the natural heritage criteria that the council will use when considering the effect of new development on the natural environment, we note that the specifics of the different levels of protection are not shown in the policy. It is important for the supplementary guidance to draw out different levels of protection for the different natural heritage designations.  00621/3/001 Scottish Government - Policy CDP 7 should make explicit reference to the hierarchy of designations as outlined within paragraph 196 of SPP 2014 and the differing levels of protection required. This should be applied accordingly in the assessment of development proposals and can be expanded on in the proposed Supplementary Guidance examining the assessment of impact. As written, Policy CDP 7 does not provide distinction between international, national and local designations.  00479/27/002 Hillhead Community Council - Objects to policy CDP 7's statement that where adverse impacts on environmental assets cannot be avoided, 'suitable mitigation should be provided'. We are very concerned by this catch all and subjective qualification. This should not be in the development plan, without further discussion and clarification, otherwise the Council is landed with applications which allege adequate mitigation which in fact are not. It is equivalent to a 'get out clause'.		

00629/3/001 RSPB Scotland - In general, support policy CDP7, in particular the emphasis on enhancing natural and landscape assets. However, concerned that the inclusion of the words "wherever possible", in relation to enhancement, may enable developers to avoid delivering on this policy. There are always opportunities to incorporate some enhancement measures, from a small number of nestboxes to large-scale planting schemes.

00621/10/001 Scottish Government - Within the first bullet point of Policy CDP 7 we would suggest the addition of a reference to 'not having an unacceptable impact on the purpose of areas designated for landscape importance'. Paragraph 197 of SPP 2014 outlines the purpose of areas of local landscape value; purpose being different from integrity or character.

### Supporting

00571/1/001 Jim Craig - Support policies and designations which protect and enhance all ecology and biodiversity assets, including in and around Bingham's Pond.

00637/13/001 Dowanhill Hyndland and Kelvinside Community Council - Supports this policy as being very beneficial for the welfare of the city as a whole, and especially the West End.

00629/3/002 RSPB Scotland - Welcome the proposal to produce Supplementary Guidance that will provide further detail on the assessment of impact, as there needs to be clarification of which is an "unacceptable effect".

00629/3/003 RSPB Scotland - Support the proposal for new Local Nature Reserves.

### Trees and Hedgerows

### Objecting

00497/3/001 Persimmon Homes - Objects to the policy CDP 7 - fourth bullet of first set of bullets should be changed from 'trees, woodlands or hedgerows that are of importance' to 'trees or woodlands covered by a Tree Preservation Order'. Unless covered by a Tree Preservation Order we do not believe it appropriate or necessary to restrict the removal of trees/hedgerows etc. unless otherwise indicated through an appropriate habitat survey.

00535/3/001 Forestry Commission Scotland - Forestry Commission Scotland (FCS) request to be included in any consultation process that will look to take forward any community growth, housing needs or transport proposals, on any land that contains whole or in part, woodland area.

The FCS representation relates to the CDP Policy and Proposals Map - City Wide. Specifically areas identified as:

- CDP10 - Proposed Community Growth Area Master plan (H115 to H117);
- CDP10 - Proposed Additions to Housing Land Supply (H111 - H114);
- CDP11 - Proposals T003 - T008).

The Scottish Government's Control of Woodland Removal Policy and the Glasgow and Clyde Valley Forest and Woodland Strategy should be referred to by local planning



authorities and developers when addressing land parcels that contain full or in part woodland cover.

When considering woodland removal local authorities should consider the Woodland Removal Policy and support woodland removal only where it would achieve significant and clearly defined additional public benefit. In some cases a proposal for compensatory planting may be required. This policy should be applied to all sites that contain woodland, and provides direction for all agencies when addressing the statutory guidance on woodland removal, contained within the National Planning Framework.

00479/24/002 Hillhead Community Council - Objects to policy CDP7 - there is no statement that trees within conservation areas are treated as if the subject of a TPO. This should be made clear within the Development Plan.

### Mapping of Environmental Designations

#### Objecting

00570/3/001 James Jamieson - Seeks changes to Figure 15 of policy CDP7 to include Willowbank Bowling Club on Victoria Crescent Road, and other nearby open spaces which have also been omitted, as Site(s) of Special Landscape Importance (SSLI). This particular open space plays a key role in townscape of the area, the character of the surrounding Conservation Area and the setting of nearby listed buildings, as well as forming the setting and location of recreation and sport for local people.

00574/5/001 Scottish Natural Heritage - Recommends that the Figure 15 of policy CDP7 is enlarged to clearly show the extent of designated sites within Glasgow. This would be more informative for developers, the public and planners and, we believe, would flag up whether they need to look more closely at the Supplementary Guidance where the detailed boundaries will be shown.

00479/24/001 Hillhead Community Council - Objects to the Figure 15 of policy CDP 7. The map is not detailed enough to show the location of tree preservation orders (TPOs.)

00479/27/001 Hillhead Community Council - Objects to the policy and proposals map, Figure 15 and policies CDP 6 and CDP 7. These do not go far enough - further measures are needed to protect corridors and other wildlife reserves. There should be a restriction on development on the borders of wildlife reserves and corridors, whether brownfield sites or not. Of particular concern are: the size of development (quantity and height); demand for amenity space and recreation; proximity to reserves and wildlife corridors - noise disturbs wildlife and a barrier area should be considered.

#### Supporting

00589/2/001 Strathclyde Geoconservation Group, 00593/1/001 The Geological Society of Glasgow - Welcomes the inclusion of geodiversity in the Proposed CDP and the Aim of protecting the landscape and geological features of the City. Trusts that Fig 15 of policy CDP7 will include the site boundaries for the geodiversity sites as stated in the second last paragraph on page 47, especially in light of the fact that the Geodiversity Audit carried out in 2013 has boundary suggestions for the sites included in the audit.

00589/4/001 Strathclyde Geoconservation Group - Support SEA commitment (page 84)

to the designation of geodiversity sites. The Geodiversity Audit of the City of Glasgow carried out by BGS in 2013 contains suggested site boundaries.

### Local Nature Reserve (Firhill)

#### Objecting

00611/1/001 Scottish Canals - The final boundary of the proposed Local Nature Reserve south of Firhill Basin should be determined by a masterplan for the wider area between Firhill and Applecross basin, including Hamiltonhill and parts of Woodside and Queens Cross. Scottish Canals is supportive of the nature reserve proposal for this area however it would be premature for the Plan to determine its final extent before a masterplan has been prepared.

00635/1/001 Partick Thistle Football Club - Objects to the proposals for a new Local Nature Reserve Change on land to the east of the Forth and Clyde Canal at Firhill. Concerned that this may frustrate full consideration of options for possible sporting or leisure uses associated with a new masterplan for the Firhill area. A wider designation should be applied to land to the east of the Forth and Clyde Canal at Firhill, including new housing, possible reconfiguration of Firhill Park, canal-side leisure and berthage, new sports facilities and a local nature reserve. Actual boundaries and locations would be the subject of a new masterplan.

00611/3/001 Scottish Canals - Action Plan, Action 80: the final boundary of the proposed Local Nature Reserve south of Firhill Basin should be determined by a masterplan for the wider area between Firhill and Applecross basin, including Hamiltonhill and parts of Woodside and Queens Cross.

### **Modifications sought by those submitting representations:**

#### Natural Environment Policy Wording

00574/6/001 Scottish Natural Heritage - Policy CDP7 should be reworded to include additional text at the end of paragraph 2: 'Supplementary Guidance will provide further information on the level of protection afforded under each natural heritage designation within Glasgow and detail on the assessment of impact'.

00621/3/001 Scottish Government - Policy CDP7 should be reworded to make explicit reference to the hierarchy of environmental designations as outlined within paragraph 196 of SPP 2014 and the differing levels of protection required.

00479/27/002 Hillhead Community Council - Policy CDP7 should be reworded to remove statement that, where adverse impacts on environmental assets cannot be avoided, 'suitable mitigation should be provided'.

00629/3/001 RSPB Scotland - Remove 'wherever possible' from the third paragraph of policy.

00621/10/001 Scottish Government - Amend first bullet point of Policy CDP 7 to read: 'the purpose, integrity or character of areas designated for their landscape importance'.

Trees and Hedgerows

00497/3/001 Persimmon Homes - Policy CDP7 should be reworded - the fourth bullet of first set of bullets should be changed from 'trees, woodlands or hedgerows that are of importance' to 'trees or woodlands covered by a Tree Preservation Order'.

00535/3/001 Forestry Commission Scotland - The Plan should refer to the need to take account of the Scottish Government's Control of Woodland Removal Policy and the Glasgow and Clyde Valley Forest and Woodland Strategy when dealing with land that with full or part woodland cover.

00479/24/002 Hillhead Community Council - Policy CDP7 should be reworded to state that trees within conservation areas are treated as if subject to a TPO.

Mapping of Environmental Designations

00570/3/001 James Jamieson - Amend Figure 15 to show Willowbank Bowling Club on Victoria Crescent Road, and other nearby open spaces which have also been omitted, as Site(s) of Special Landscape Importance (SSLI).

00574/5/001 Scottish Natural Heritage - Figure 15 of policy CDP7 should be enlarged to clearly show the extent of designated sites within Glasgow.

00479/24/001 Hillhead Community Council - Amend Figure 15 of policy CDP 7 to make it detailed enough to show the location of Tree Preservation Orders.

00479/27/001 Hillhead Community Council - Policy CDP7 should be reworded to include further measures to protect wildlife corridors and other wildlife reserves.

Local Nature Reserve (Firhill)

00611/1/001 Scottish Canals - Amend policy CDP7 to indicate that the final boundary of the proposed Local Nature Reserve south of Firhill Basin should be determined by a masterplan for the wider area.

00635/1/001 Partick Thistle Football Club - The City Development Plan should not propose a new Local Nature Reserve on land to the east of the Forth and Clyde Canal at Firhill until a wider masterplan for the Firhill area has determined the boundary.

00611/3/001 Scottish Canals – The final boundary of the proposed Local Nature Reserve south of Firhill Basin should be determined by a masterplan for the wider area between Firhill and Applecross basin, including Hamiltonhill and parts of Woodside and Queens Cross.

**Summary of responses (including reasons) by planning authority:**Natural Environment Policy WordingObjecting

00574/6/001 Scottish Natural Heritage, 00621/3/001 Scottish Government - The Council will bring forward Supplementary Guidance to support policy CDP7 and provide further

guidance on matters such as assessment of impact and the relative protection afforded to different types of natural heritage designation.

SPP (CE2, paragraph 196) provides little guidance on this matter, stating only that: 'international, national and locally designated areas and sites should be identified and afforded the appropriate level of protection in development plans' and that 'the level of protection given to local designations should not be as high as that given to international or national designations.'

There are no international designations in Glasgow and only a limited number of national designations, in the form of SSSIs. With a view to producing a plan that is succinct and concise, it is not considered necessary, or practical, for The Plan to set out how the detailed consideration of development proposals affecting these different types of natural heritage designation would vary. It is considered sufficient for the Supplementary Guidance to provide further guidance on the policy by setting this out in an appropriate level of detail. This approach should be reflected in the Plan.

The Reporter could, if so minded, amend policy CDP7 by deleting the final sentence of paragraph 2 and replacing it with: "Supplementary Guidance will provide further information on the level of protection afforded under each natural heritage designation within Glasgow and detail on the assessment of impact".

00479/27/002 Hillhead Community Council - Paragraphs 202 and 203 of Scottish Planning Policy (CE2) set out some of the considerations which should be taken into account when assessing proposals for development on sites protected for their landscape or nature conservation interests. They indicate that development management decisions should 'take account of potential effects on landscapes and the natural and water environment, including cumulative effects' but also make it clear that 'designation does not impose an automatic prohibition on development'.

There may be instances where the social or economic benefits to be gained from a development affecting a site designated for its nature conservation, landscape or geodiversity interests, clearly outweigh those interests. In such circumstances, it is important that suitable mitigation is provided to compensate for the impact of the development on these interests. Should the plan not provide for mitigation, then it possible that such developments could proceed but without any of the compensatory benefits.

No modifications recommended.

00629/3/001 RSPB Scotland - Whilst it is anticipated that this policy will provide for enhancement to be delivered through most development proposals, there may be instances where the scale of the development (e.g. a house extension), or its location, may mean that it is not appropriate. Supplementary Guidance would set out the type of limited circumstances in which no enhancement would be justifiable.

No modifications recommended.

00621/10/001 Scottish Government - Paragraph 197 of SPP (CE2), published after the Proposed LDP, indicates what the purpose of areas of local landscape value should be, including safeguarding and enhancing character and promoting awareness.

The Reporter could, if so minded, amend the first bullet point of Policy CDP 7 to read: 'the purpose, integrity or character of areas designated for their landscape importance'. This would help align the policy more closely to the new SPP.

### Supporting

00571/1/001 Jim Craig, 00637/13/001 Dowanhill Hyndland and Kelvinside Community Council, 00629/3/002, 00629/3/003 RSPB Scotland - Noted.

No modifications recommended.

### Trees and Hedgerows

### Objecting

00497/3/001 Persimmon Homes, 00479/24/002 Hillhead Community Council - Policy CDP7 indicates that new development should not have an unacceptable effect on trees, woodlands or hedgerows that are of importance. Figure 15 indicates that trees subject to a Tree Preservation Order are protected by the policy but is also the case that City Plan 2 protects trees within Conservation Areas and trees on Council owned land as if they are covered by a TPO (CE17, policy ENV 8). The Council will bring forward Supplementary Guidance which will provide further guidance on how policy CDP7 should be interpreted. It is the Council's intention that this will clarify that trees within Conservation Areas and trees on Council owned land will be protected as if covered by a TPO.

Policy CDP7 is intended to protect important sites and habitats but also to enhance natural and landscape assets by linking habitats, enhancing the health of ecosystems and promoting resilience to climate change. Trees and woodlands can play a key role in this respect, as recognised by the Glasgow and Clyde Valley Forestry and Woodland Strategy (OC39). A placemaking approach to the development of a site should also respect the natural environment by responding to the site's qualities and character. The Supplementary Guidance which the Council proposes to bring forward to support policy CDP7 will provide guidance on when trees, woodland and hedgerows, not covered by a TPO (or as if covered by a TPO) should be protected on site.

No modifications recommended.

00535/3/001 Forestry Commission Scotland - The Council will bring forward Supplementary Guidance which will provide further guidance on how policy CDP7 should be interpreted. It is the Council's intention that this will make reference to the Scottish Government's Policy on Control of Woodland Removal (OC42).

The Reporter could, if so minded, amend policy CDP7 by including new text after the final sentence of the Policy, to read: 'The Scottish Government's Policy on Control of Woodland Removal states a strong presumption in favour of protecting Scotland's woodland resources. Woodland removal is likely to be acceptable only where it would achieve significant and clearly defined additional public benefits. Compensatory planting may be required. Supplementary Guidance will provide further guidance.' This would provide a useful clarification of the role played by the Government's Policy on Control of Woodland Removal.

## Mapping of Environmental Designations

### Objecting

00570/3/001 James Jamieson - Figure 15 is intended to provide an illustration of the extent of designated landscape and nature conservation sites, including Sites of Special Landscape Importance. Policy CDP7 indicates that the Council will bring forward Supplementary Guidance to support this policy that will set out the detailed boundaries of the existing designated sites. The policy will protect the sites shown in the Supplementary Guidance.

Willowbank Bowling Club is protected, by policy CDP6, through its identification, on the Glasgow Open Space Map, as a 'Sports Pitch' (OC90). However, it is not currently designated as a Site of Special Landscape Importance in City Plan 2 (CE17, Environmental Policy Designations Map West) and, as things stand, will not be identified in the Supplementary Guidance. However, the policy indicates that the SG will, in due course, require to be refreshed to reflect a proposed review of site boundaries and justifications. This could consider the case for recognising the landscape value of the site.

The objector has not specified which of the other nearby open spaces he considers to have been omitted as SSLIs. Some of the spaces in the surrounding area are designated as SSLIs in City Plan 2 and, on this basis, will be identified in the SG which the Council will bring forward to support this policy, and others will benefit from protection through policy CDP6 and identification, as open space, on the Glasgow Open Space Map.

No modifications recommended.

00574/5/001 Scottish Natural Heritage, 00479/24/001 Hillhead Community Council - Figure 15 is intended to provide an illustration of the extent of designated landscape and nature conservation sites, including TPOs. It is not intended to provide a definitive picture of the extent of these sites as:

- some of them (including TPOS, LNRs, SSSIs, etc.) are not designated through the development plan process, with the result that new ones can be designated over the period of the Plan; and
- there are there are a large number of such sites in Glasgow, sometimes overlapping, which make then difficult to identify within the Plan itself. Within the current plan format, it would be difficult to enlarge the map to the extent that all of the designated sites (some of which are quite small) would be clearly shown.

As a result, policy CDP7 indicates that the Council will bring forward Supplementary Guidance to support this policy that will set out the detailed boundaries of these sites. The policy will protect the sites shown in the Supplementary Guidance.

No modifications recommended.

00479/27/001 Hillhead Community Council - Policy CDP7 indicates that the Council will bring forward Supplementary Guidance to support this policy that will set out the detailed boundaries of designated landscape and nature conservation sites. The policy will protect the sites shown in the Supplementary Guidance. The policy indicates that policy should not have an unacceptable effect, either directly, indirectly or cumulatively on these

sites, and the Supplementary Guidance will provide further advice on how this will be done. This should ensure that development proposals in the areas immediately adjacent to the sites will not have an unacceptable impact on them. However, the Plan does not impose a restriction on development on the border of such sites as this would be contrary to Scottish Planning Policy (CE2, paragraph 196), which states that buffer zones should not be established around areas designated for their natural heritage importance.

The Policy and Proposals Map is intended to illustrate the plan's policies and proposals spatially and allow the specific location of proposals to be accurately identified. Existing designations are not proposals. Whilst they are the subject of policies, it is considered that it is not practical to show them on the Policy and Proposals Map because:

- some of them (including TPOS, LNRs, SSSIs, etc.) are not designated through the development plan process with the result that new ones can be designated over the period of the Plan; and
- there are a large number of such sites in Glasgow, sometimes overlapping – this would be difficult to illustrate clearly on a Policy and Proposals Map which also illustrates policies and proposals.

No modifications recommended.

#### Supporting

00589/2/001, 00589/4/001 Strathclyde Geoconservation Group, 00593/1/001 The Geological Society of Glasgow - Noted. The Council will bring forward Supplementary Guidance to support policy CDP7. The Supplementary Guidance will include the boundaries of the Geodiversity Sites.

No modifications recommended.

#### Local Nature Reserve (Firhill)

#### Objecting

00611/1/001, 00611/3/001 Scottish Canals, 00635/1/001 Partick Thistle Football Club - The area surrounding the Proposed Claypits Local Nature Reserve (to the east of the Forth and Clyde Canal) was the subject of a charrette in early February 2015. The charrette took the form of a series of design workshops, where ideas for the improvement of the Woodside; Firhill and Hamiltonhill areas of North Glasgow (including the canal corridor) were investigated. The charrette involved local residents; businesses; landowners; community groups; representatives of the Council; and other agencies, including Scottish Canals and Partick Thistle Football Club.

A provisional development framework was presented at the end of the charrette with broad support from the attendees (OC93, LNR indicative extent outlined in green hatch). It identified the need for further work to determine the detailed boundaries of the LNR, before its inclusion in the final development framework. Work is in progress with a view to producing a draft Framework Plan by July 2015 and the detailed LNR boundary is currently subject to discussion and further site analysis. The Council is content that a process is in place that will result in a boundary which is acceptable to all parties, including the local communities, the Council and the objectors.

The Reporter could, if so minded, amend the Plan by inserting new text at the end of the penultimate paragraph of policy CDP7, to read: 'The detailed boundary of the Claypits LNR will be determined through a masterplanning process based on the outcomes of the charrette for the area.' This would help clarify the latest position on the designation of an LNR in this area. The Supplementary Guidance to CDP7 will identify the agreed boundary of the Claypits LNR.

### **Reporter's conclusions:**

#### Natural Environment Policy Wording

1. I agree with Scottish Natural Heritage and the Scottish Government that Policy CDP7 as drafted is not compliant with the requirements of paragraph 196 of Scottish Planning Policy (SPP), because it fails to distinguish between the different levels of protection which should be applied to the various natural heritage designations. For example, a tighter regime is likely to be applicable in a site of special scientific interest, which is a national designation, than in a local nature reserve.

2. I therefore propose to recommend amending the policy in the manner suggested by Scottish Natural Heritage (and now endorsed by the council), which will place the responsibility on Supplementary Guidance to provide further guidance on the matter.

3. I understand the concern of Hillhead Community Council that 'mitigation' should not be invoked when a proposal is intrinsically unacceptable. However, there will be occasions where the effects on a designated site can be rendered acceptable by suitable mitigation. What is considered acceptable may depend on the importance of the site (see above), and the benefits of the proposed development. I am satisfied that the policy strikes the right balance in that regard, and does not require to be modified to respond to the community council's objection.

4. I accept the council's position that there will be some instances when it is not possible for new development to enhance natural and landscape assets. The policy needs to reflect that reality by retaining the phrase 'wherever possible'.

5. I note that the council has no objection to the change to the first bullet point of Policy CDP7 suggested by the Scottish Government, which would refer to the 'purpose' as well as the 'integrity and character' of areas designated for their landscape importance. I support this modification, which would bring the policy in line with paragraph 197 of SPP.

#### Trees and Hedgerows

6. Paragraph 194 of SPP advises that the planning system should protect and enhance ancient semi-natural woodland as an important and irreplaceable resource, together with other native or long-established woods, hedgerows and individual trees with high nature conservation or landscape value. This indicates that protection goes beyond trees and woodlands covered by a tree preservation order (TPO). Trees and woodlands play an important part in the green network (Policy CDP4), and in providing habitats and contributing to the biodiversity of the City. They are a valued component of the character and attractive appearance of conservation areas (a point acknowledged in the supporting text at page 46 of the Proposed Plan).



7. It would be wrong therefore to restrict the policy in the way proposed by Persimmon Homes. It will be a matter for supplementary guidance to provide further detail on the application of Policy CDP7.

8. Elsewhere Forestry Commission Scotland draws attention to the Scottish Government's Control of Woodland Policy which has a strong presumption in favour of protecting Scotland's woodland resources. I agree that the policy should be amended to reflect the Government's policy that woodland removal is likely to be acceptable only where it would achieve significant and clearly defined additional public benefits.

#### Mapping of Environmental Designations

9. Figure 15 of Policy CDP7 shows existing Sites of Landscape Importance (which do not include Willowbank Bowling Club) in diagrammatic fashion. The bowling club is indicated as a sports pitch on the Glasgow Open Space Map. As such it is protected by Policy CDP6, which supports the retention of identified areas of open space for that purpose. I am not convinced therefore that designation as a Site of Landscape Importance is necessary or appropriate, particularly in the light of the presence of the surrounding conservation area and nearby listed buildings which themselves are protected by Policy CDP9 (historic environment).

10. Whilst I understand objectors' desire that Figure 15 be enlarged so that the detailed boundaries of natural heritage sites and TPOs could be discerned from the Proposed Plan, I also appreciate the practical difficulties that would arise, since there are so many sites across the City (some statutory, and others not), including ones with overlapping boundaries. I therefore accept the council's position that this detailed information is best shown in Supplementary Guidance.

11. It would not be appropriate to extend the scope of Policy CDP7 to protect areas beyond designated sites and corridors, as that would run contrary to the guidance in paragraph 196 of SPP that buffer zones should not be established around areas designated for their natural heritage importance. I consider that Policy CDP7, which states that new development should not have an unacceptable effect on sites, habitats, species or ecosystems protected by law or designated for their nature conservation value, provides an adequate general statement of the council's policy in this matter. I am content that the detailed policies to protect wildlife sites and corridors that are sought by Hillhead Community Council can be left for Supplementary Guidance, which will ultimately become part of the statutory development plan.

#### Local Nature Reserve (Firhill)

12. I am satisfied that the objections from Scottish Canals and Partick Thistle Football Club would be met if the Proposed Plan is modified to clarify that the detailed boundary of the Claypits Local Nature Reserve will be determined through a masterplanning process based on the outcomes of the charrette for the area which was held in February 2015. The charrette and masterplan process involve interested parties including Scottish Canals and Partick Thistle FC, and I have no reason to doubt that an acceptable outcome will be achieved.

#### Supporting representations

13. I note the representations made in support of the Proposed Plan which are

summarised above, but they do not raise any unresolved issues which I require to examine.

**Reporter's recommendations:**

Modify Policy CDP7 by deleting the final sentence of paragraph 2 and replacing it with: *"Supplementary Guidance will provide further information on the level of protection afforded under each natural heritage designation within Glasgow and detail on the assessment of impact"*.

Modify the first bullet point of Policy CDP 7 to read: *"the purpose, integrity or character of areas designated for their landscape importance"*.

Modify Policy CDP7 by including new text after the final sentence of the policy, to read: *"The Scottish Government's Policy on Control of Woodland Removal states a strong presumption in favour of protecting Scotland's woodland resources. Woodland removal is likely to be acceptable only where it would achieve significant and clearly defined additional public benefits. Compensatory planting may be required. Supplementary Guidance will provide further guidance."*

Modify the Proposed Plan by inserting new text at the end of the penultimate paragraph of Policy CDP7, to read: *"The detailed boundary of the Claypits LNR will be determined through a masterplanning process based on the outcomes of the charrette for the area."*

Issue 15	Water Environment	
Development plan reference:	The Plan Policy CDP8 Water Environment (Pages 48-50)	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
Scottish Water (00452) Hillhead Community Council (00479) Persimmon Homes (00497) Scottish Government (00621) RSPB Scotland (00629) Strathclyde Partnership for Transport (00633)		
Provision of the development plan to which the issue relates:	Policy CDP 8 - Water Environment, particularly in relation to the expected role of new development in addressing flooding concerns.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00497/4/001 Persimmon Homes - Bullet 1 of Policy CDP 8 ("minimising and reducing flood risk") should be deleted - the subsequent two bullet points adequately cover the responsibility of the applicant in respect of new development proposals.  00479/17/002 Hillhead Community Council - Objection to further development along the River Clyde until such time as the flooding and drainage issues have been solved: this seems unlikely within the five years of the plan.  00479/10/010 Hillhead Community Council - The Plan does not address the issue of drainage and has not made an updated River Clyde Flood Management Plan available.  00633/16/002 Strathclyde Partnership for Transport - The directing development diagram of policy CDP 8 does not add to the interpretation or understanding of this policy. These diagrams should sit clearly as a suite of diagrams which aid with the understanding of the Plan as a whole and the specific policy to which they relate.  00633/16/001 Strathclyde Partnership for Transport - Support the acknowledgement that flood management measures are required to protect residential, commercial, cultural and other properties, in addition to essential transport and leisure routes and facilities. Suggest a change to the fourth paragraph, 3rd sentence of the policy context on page 48 - add the word 'infrastructure' after 'leisure'. The protection of transport infrastructure as part of flood management measures is vital in ensuring the continued operation of public transport services in the event of severe weather.  00621/11/003 Scottish Government - Within the aims section of Policy CDP 8 it would also be useful to include a reference to NPF 3 as relevant, i.e. Delivery/implementation of the MGSDP national development.		

00621/11/004 Scottish Government - Paragraph 5 of Policy CDP 8 discusses the need for Flood Risk Assessment. It could be highlighted that, in line with SPP 2014, FRAs may not be necessary in every circumstance.

00621/11/005 Scottish Government - Policy CDP 8 refers to culverts and references the requirements of national policy. Please note that SPP 2014 does not contain detailed policy prescription on culverts.

00621/11/006 Scottish Government - Policy CDP 8 refers to the requirements of SPP in relation to functional flood plains. SPP 2014 provides only limited requirements on this. It would be beneficial for the Plan to clearly what the development requirements should be in a functional flood plain.

00621/11/007 Scottish Government - We consider it would be useful to include a policy reference against the piecemeal reduction of the functional flood plain in accordance with paragraph 256 of SPP 2014.

00621/11/008 Scottish Government - Policy in relation to land raising should be strengthened to reflect SPP 2014 which states land raising should only be considered in exceptional circumstances.

00621/11/001 Scottish Government - We would recommend that the following sentence within Policy CDP 8 be amended as follows: 'Development proposals must also take account of relevant requirements in, for example, the City Centre Strategy and Action Plan 2014-2019 and Firth of Clyde Marine Spatial Plan and forthcoming statutory National Marine Plan and Regional Plan.'

#### Supporting

00452/2/001 Scottish Water - Scottish Water support The Plan and will continue to work with Glasgow City Council and all interested parties to enable development. We have had continuous engagement throughout the process and will continue supporting and helping in the delivery of development that The Plan sets out.

00629/2/001 RSPB Scotland - We support this policy and proposals to reinstate natural flood management, as they provide opportunities to deliver biodiversity gains.

#### **Modifications sought by those submitting representations:**

00497/4/001 Persimmon Homes - Delete Bullet Point 1 ('minimising and reducing flood risk') of Policy CDP8.

00479/17/002 Hillhead Community Council - The Plan should not promote development along the Clyde until such times as flooding and drainage issues have been solved.

00479/10/010 Hillhead Community Council - The Plan should address the issue of drainage and should include an updated River Clyde Flood Management Plan.

00633/16/002 Strathclyde Partnership for Transport - Review the directing development diagram of policy CDP 8 to ensure it is conveying the intended message. As a minimum the shading in the top layer should not obliterate the plan underneath and should also be labelled.

00633/16/001	Strathclyde Partnership for Transport - Policy CDP8 should be reworded - change the fourth paragraph, 3rd sentence of the policy context on page 48 by adding the word 'infrastructure' after 'leisure' to read: 'in addition to essential transport and leisure infrastructure, routes and facilities'.
00621/11/003	Scottish Government - Include reference to the need to deliver /implement the MGSDP as a national development in NPF 3 in the 'Aims' section of the context to policy CDP8.
00621/11/004	Scottish Government - Paragraph 5 of CDP 8 should highlight that Flood Risk Assessments may not be necessary in every circumstance.
00621/11/005	Scottish Government - Policy CDP 8 should be clear that SPP 2014 does not contain detailed policy prescription on culverts.
00621/11/006	Scottish Government - The Plan should clearly identify the requirements for development in functional flood plains.
00621/11/007	Scottish Government - A policy reference against the piecemeal reduction of the functional flood plain in accordance with paragraph 256 of SPP 2014 should be included.
00621/11/008	Scottish Government - Policy in relation to land raising should be strengthened to reflect SPP 2014 which states land raising should only be considered in exceptional circumstances.
00621/11/001	Scottish Government - Amend the final sentence of the 7th paragraph of policy CDP 8 to read: 'Development proposals must also take account of relevant requirements in, for example, the City Centre Strategy and Action Plan 2014-2019, the Firth of Clyde Marine Spatial Plan and forthcoming statutory National Marine Plan and Regional Plan.'

#### **Summary of responses (including reasons) by planning authority:**

##### Objecting

00497/4/001 Persimmon Homes - SPP (CE2, paragraph 255) states that the planning system should promote, inter-alia, flood reduction, including, where appropriate, restoring natural features and characteristics, and opening existing culverts where possible. Paragraph 6 of policy CDP8 reflects these factors, stating that, wherever possible, new development proposals should take opportunities to reinstate natural flood management measures, including the removal of culverts. Such measures are aimed at reducing flood risk, and not merely avoiding any increase in the risk of flooding. As such, the inclusion of all 3 criteria at the start of policy CDP8 is considered to accord with SPP.

No modifications recommended.

00479/17/002 Hillhead Community Council - Policy CDP8 indicates that, for areas potentially at flood risk, the Council will require developers to consider the flood risk to their proposed development through a Flood Risk Assessment (FRA). It further indicates that the Council will develop the SPP flood risk framework as a basis for determining the likely acceptability of development proposal relative to their flood risk.

The Council has brought forward draft Supplementary Guidance (OC66) to support policy CDP8. It provides further detailed guidance on the application of these aspects of the policy. It indicates that, if flood risks are identified during the flood risk screening process, there will be a requirement to carry out a detailed FRA. It further indicates that the FRA must clearly identify specific flood risks, quantify issues that need to be addressed and demonstrate that the flood mitigation strategy can be delivered, in compliance with all other relevant legislative requirements (OC66, sections 5 and 6). This means that development can only proceed if the flood risk can be addressed satisfactorily.

Mitigation will require to be brought forward in accordance with the River Clyde Flood Management Strategy (City Plan 2 (CE17) development guide DG/ENV 6), as set out in paragraph 7 of policy CDP8 and the introductory paragraphs of the draft Supplementary Guidance.

No modifications recommended.

00479/10/010 Hillhead Community Council - Policy CDP8 Water Environment deals with flooding and drainage issues where they interact with land use planning. The Policy indicates that development proposals likely to have an impact on the function or character of the River Clyde or its surroundings will require to address the Council's aspirations for flood management, including the River Clyde Flood Management Strategy (as set out in Supplementary Guidance). The Council has brought forward draft Supplementary Guidance on the Water Environment (OC66) and the introduction states 'The River Clyde Flood Management Strategy (City Plan 2 development guide DG/ENV 6) will be brought forward as Supplementary Guidance in support of this SG and CDP policy CDP 8'. DG/ENV 6 (CE17) is still considered relevant and does not require to be updated.

No modifications recommended.

00633/16/002 Strathclyde Partnership for Transport - There are a number of 'Directing Development' diagrams in the Plan. These diagrams were intended to broadly indicate the key spatial implications for a particular policy area, at a City-wide level, and relate this to the Plan's Spatial Strategy. The diagrams are for illustrative purposes only. It is agreed that the existing diagrams in CDP5, CDP6, CDP8 and CDP9 require further refinement and amendment.

The Reporter could, if so minded, agree to the amendment of the suite of Directing Development diagrams within CDP5, CDP6, CDP8 and CDP9 to better illustrate the key spatial implications for that particular policy area. This will involve the addition of a key and/or a short descriptive narrative which explains each diagram and either the removal or fading out of the (Spatial Strategy) background layer. In addition, consideration will be given to extending the suite of diagrams to include similar diagrams for Policies CDP3, CDP4, CDP7 and CDP11. Diagrams of this nature are not required for Policies CDP1 or CDP12. Figure 9 (CDP2) is not considered to require amendment as it already fulfils its purpose of providing an indicative illustration of the spatial strategy and scope of Policy CDP2.

Such changes should bring greater clarity and help the reader to better understand the individual spatial implications of each of the policies in the Plan.

00633/16/001 Strathclyde Partnership for Transport - The context to CDP8 states, in relation to the River Clyde and the City's other key waterways, that flood management

measures are required to protect 'essential transport and leisure routes and facilities'. It is considered that the term 'routes and facilities' would include transport infrastructure, and that no change is required to address the objector's concerns.

No modifications recommended.

00621/11/003 Scottish Government - The application of policy CDP8 is one of a number of means by which the Council, and its partners, will aim to deliver the MGSDP National Development, as identified in NPF3 (CE1, National Development 3). Reference to this could usefully be included in the 'Aims' section in the policy context.

The Reporter could, if so minded, amend the Aims section of Policy CDP 8 by deleting the fourth bullet point and replacing it with two bullet points, to read:

- "meet the requirements of the Flood Risk Management (Scotland) Act 2009 and Scottish Planning Policy 2014;
- help deliver the Metropolitan Glasgow Strategic Drainage Partnership (MGSDP) Scheme, a National Development in NPF3; and"

This would better reflect NPF3.

00621/11/004 Scottish Government - It is considered that paragraph 5 does not indicate that flood risk assessment will be necessary in every circumstance – it indicates that FRAs should be undertaken for areas potentially at flood risk. Nevertheless, further clarification of this statement could be usefully provided to indicate the role which the flood risk framework will play in determining whether a FRA is required. This would more fully reflect paragraph 266 of SPP 2014 (CE2).

The Reporter could, if so minded, amend policy CDP8 by replacing the first sentence of the 5th paragraph with:

"For areas potentially at flood risk, the Council will require developers to consider the flood risk to their proposed development through a Flood Risk Assessment (FRA); and the impact of discharging surface water from the proposed development to any water body or wetland, through a Drainage Impact Assessment (DIA). Potential flood risk will be determined by a screening process, including consideration of the indicative flood risk maps produced by the Scottish Environment Protection Agency (SEPA) and the flood risk framework."

00621/11/005 Scottish Government - The Plan was produced before SPP 2014 was published and had, therefore, been drafted to reflect the provisions of SPP 2010. Paragraph 211 of SPP 2010 (CE3) set out a limited number of situations where the construction of new culverts may be acceptable as exceptions to the general presumption against watercourses being culverted, specifically as part of a scheme to manage flood risk or where used to carry a watercourse under a road or railway.

SPP 2014 does not include such detail, stating only (CE2, paragraph 255) that: the planning system should promote flood reduction, avoiding the construction of new culverts and opening existing culverts where possible. As a result, it is considered that further clarification of the final sentence of paragraph 6 could be beneficial.

The Reporter could, if so minded, amend the final sentence of paragraph 6 of policy CDP8 to read: "Proposals for the formation of new culverts are unlikely to be acceptable - the limited circumstances where they may be will be set out in Supplementary Guidance". This would help align the policy more closely to the new SPP.

00621/11/006, 00621/11/007 Scottish Government - The Plan was produced before SPP 2014 was published and had, therefore, been drafted to reflect the provisions of SPP 2010. Paragraph 203 of SPP 2010 (CE3) sets out a number circumstances in which development on a functional flood plain may be acceptable, but the same level of detail isn't included in SPP 2014 and the reference to consistency with the requirements of SPP would result in confusion. SPP 2014 does, however, state that piecemeal reduction of the functional flood plain should be avoided (CE2, paragraph 256). A rewording to reflect SPP 2014 would help clarify the intent of the policy.

The Reporter could, if so minded, amend the last sentence of the second last paragraph of CDP 8 to read:

"Development proposed in a functional flood plain is unlikely to be acceptable. Development should only take place in a functional flood plain where it can be designed to commensurate with potential flood risk, generally without the need to raise or defend land, and where it provides for appropriate compensatory storage. Piecemeal reduction of the functional floodplain should be avoided given the cumulative effects of reducing storage capacity. Supplementary Guidance will be brought forward to provide further detail."

00621/11/008 Scottish Government - Scottish Planning Policy published 23 June 2014 (CE2, paragraph 265) sets out an updated national planning policy position. It is considered that Policy CDP 8 would benefit from being updated to reflect this.

The Reporter could, if so minded, amend the last paragraph of CDP 8 to read:

"Whilst avoiding development on sites liable to flooding should always be the primary objective, proposals for land raising (work that permanently raises a site above the functional flood plain of a watercourse, or elsewhere if flooding is an issue) will only be considered in exceptional circumstances, including where the developer can demonstrate that this: would have a neutral or positive effect on the probability of flooding elsewhere; would be linked to the provision of compensatory storage; and would not create islands of development. Supplementary guidance will provide further detail."

00621/11/001 Scottish Government - The National Marine Plan (NMP) was adopted on 25 March 2015 and laid before Parliament on 27 March 2015 (OC91). A draft Circular (OC92 - Planning Scotland's Seas) highlights the importance of alignment between marine and land use plans and that decision making is consistent with regards to the marine environment (paragraphs 33 – 36).

The Reporter could, if so minded, amend the final sentence of the 7th paragraph of policy CDP 8 to read:

"Development proposals must also take account of relevant requirements in, for example, the City Centre Strategy and Action Plan 2014-2019, the Firth of Clyde Marine Spatial Plan and the statutory National Marine Plan and Regional Plan."



This would better reflect the Government's intentions regarding the alignment of the land use and marine planning systems.

### Supporting

00452/2/001 Scottish Water, 00629/2/001 RSPB Scotland - Noted.

No modifications recommended.

### **Reporter's conclusions:**

#### Flood reduction

1. I am content that the first bullet point of Policy CDP8, which requires applicants to demonstrate that their proposals minimise and reduce flood risk, is consistent with Scottish Government policy set out in Scottish Planning Policy (SPP). SPP goes further than merely requiring development proposals not to increase flood risk.
2. Paragraph 254 of SPP advises that planning can play an important part in reducing the vulnerability of existing and future development to flooding. Paragraph 255 states that the planning system should promote "*flood reduction: assessing flood risk and, where appropriate, undertaking natural and structural flood management measures, including flood protection, restoring natural features and characteristics, enhancing flood storage capacity, avoiding the construction of new culverts and opening existing culverts where possible*".
3. That underlines the Government's expectation that development proposals should look to minimise flood risk, and reduce it where appropriate/possible. I do not accept this criticism of Policy CDP8 therefore.

#### Development along the River Clyde

4. Given the geography of the City, which straddles the River Clyde, it would be impractical to impose a moratorium on development along the river corridor. However, I consider that the legitimate concerns raised by Hillhead Community Council will be addressed satisfactorily by the terms of Policy CDP8 and the associated Supplementary Guidance.
5. Policy CDP8 requires applicants to demonstrate that their proposals avoid any increased risk of flooding from within the site or outwith the site as a consequence of the development, and avoid any increase in the quantity and rate of surface water run-off from any site. There are special provisions for development proposals likely to have an impact on the function or character of the River Clyde and its surroundings, which will have to take account of the River Clyde Flood Management Strategy and the other detailed terms of Supplementary Guidance. The requirement for a flood risk assessment will ensure that specific flood risks are fully addressed; if these risks are not or cannot be resolved a proposal should be refused as contrary to Policy CDP8.
6. I note that the River Clyde Flood Management Strategy (currently found at DG/ENV6 of City Plan 2) is to be brought forward as supplementary guidance, at which time the need or otherwise for updating should be considered.

Directing development diagram

7. I agree with Strathclyde Partnership for Transport that the diagram on page 50 is hard to interpret in its current form, and consider that it needs to be modified as the council now propose, if it is to be retained in the Proposed Plan. In particular, the addition of a key and a written explanation of what the diagram is supposed to convey would be very helpful. I therefore propose to modify the suite of Directing Development diagrams within CDP5, CDP6, CDP8 and CDP9 (see Issue 13).

Transport infrastructure

8. I see no need to amend the policy context section on page 48 of the Proposed Plan to emphasise the need to protect transport infrastructure from flooding, as the text already covers that point within the phrase 'essential transport and leisure routes and facilities'.

Metropolitan Glasgow Strategic Drainage Partnership

9. I acknowledge the need for the Proposed Plan to make reference to the status of the above as a national development in Scotland's Third National Planning Framework (NPF3). The council's proposed modification to the Aims section on page 48 would achieve that objective.

Flood risk assessments

10. I am satisfied that the amendment now proposed to paragraph 5 of Policy CDP8 would make clear that flood risk assessments will not be required in all cases, and would satisfactorily address the concern raised by the Scottish Government. Paragraph 266 of SPP advises that flood risk assessments will generally be required for applications within areas identified as high or medium likelihood of flooding/flood risk in SEPA's flood maps.

Culverts

11. Similarly, the proposed modification to paragraph 6 of Policy CDP8 would bring the policy in line with the reference to culverts in the latest (2014) version of SPP, rather than the 2010 version that it replaced, which was extant when the Proposed Plan was produced.

Functional flood plains

12. A similar issue arose in policy CDP8's reference to SPP's requirements for development in a functional floodplain, which has been overtaken by the publication of the current version of SPP in 2014. However, paragraph 256 of SPP 2014 still advises that piecemeal reduction of the functional floodplain should be avoided given the cumulative effects of reducing storage capacity. The council's proposed re-wording would help to clarify the point.

Land raising

13. Paragraph 265 of SPP 2014 states that land raising should only be considered in exceptional circumstances, where it can be shown to have a neutral or better impact on flood risk outside the raised area. Compensatory storage may be required. The council's proposed modification to Policy CDP8 would accurately reflect that latest expression of

Scottish Government policy on the matter.

### National Marine Plan and Regional Plan

14. The National Marine Plan has been adopted since the production of the Proposed Plan, and there is a need to make sure that the local development plan aligns with the new marine plans. The form of words suggested by the council would achieve that purpose.

### Supporting representations

15. I note the representations made in support of the Proposed Plan which are summarised above, but they do not raise any unresolved issues which I require to examine.

### **Reporter's recommendations:**

Modify the Aims section of Policy CDP8 by deleting the fourth bullet point and replacing it with two bullet points, to read:

- *“meet the requirements of the Flood Risk Management (Scotland) Act 2009 and Scottish Planning Policy 2014;*
- *help deliver the Metropolitan Glasgow Strategic Drainage Partnership (MGSDP) Scheme, a National Development in NPF3; and”*

Modify Policy CDP8 by replacing the first sentence of paragraph 5 with:

*“For areas potentially at flood risk, the Council will require developers to consider the flood risk to their proposed development through a Flood Risk Assessment (FRA); and the impact of discharging surface water from the proposed development to any water body or wetland, through a Drainage Impact Assessment (DIA). Potential flood risk will be determined by a screening process, including consideration of the indicative flood risk maps produced by the Scottish Environment Protection Agency (SEPA) and the flood risk framework.”*

Modify the final sentence of paragraph 6 of Policy CDP8 to read: *“Proposals for the formation of new culverts are unlikely to be acceptable - the limited circumstances where they may be will be set out in Supplementary Guidance”.*

Modify the final sentence of paragraph 7 of Policy CDP 8 to read:

*“Development proposals must also take account of relevant requirements in, for example, the City Centre Strategy and Action Plan 2014-2019, the Firth of Clyde Marine Spatial Plan and the statutory National Marine Plan and Regional Plan.”*

Modify the last sentence of paragraph 8 of Policy CDP8 to read:

*“Development proposed in a functional flood plain is unlikely to be acceptable. Development should only take place in a functional flood plain where it can be designed to be commensurate with potential flood risk, generally without the need to raise or defend land, and where it provides for appropriate compensatory storage. Piecemeal reduction of the functional floodplain should be avoided given the cumulative effects of reducing storage capacity. Supplementary Guidance will be brought forward to provide further detail.”*

Modify the final paragraph of Policy CDP8 to read:

*“Whilst avoiding development on sites liable to flooding should always be the primary objective, proposals for land raising (work that permanently raises a site above the functional flood plain of a watercourse, or elsewhere if flooding is an issue) will only be considered in exceptional circumstances, including where the developer can demonstrate that this: would have a neutral or positive effect on the probability of flooding elsewhere; would be linked to the provision of compensatory storage; and would not create islands of development. Supplementary guidance will provide further detail.”*

Issue 16	Historic Environment	
Development plan reference:	Policy CDP 9 - Historic Environment, Pages 51-52	Reporter: Timothy Brian
Body or person(s) submitting a representation raising the issue (including reference number):		
Roy Hamdy (00149) Glasgow Centre for Population Health (00442) United Wholesale (Scotland) Ltd (00457) Hillhead Community Council (00479) James Jamieson (00570) Jim Craig (00571) Royal Mail Group (00578) Scottish Government (00621) Dennistoun Community Council (00634) Dowanhill Hyndland and Kelvinside Community Council (00637)		
Provision of the development plan to which the issue relates:	Policy CDP 9 - Historic Environment is one of ten detailed policies in the Plan which contributes in part to meeting the requirement of the two overarching policies. Policy CDP 9 seeks to ensure the appropriate protection, enhancement and management of Glasgow's heritage assets.	
Planning authority's summary of the representation(s):		
<u>Historic Environment Policy Wording</u>		
<u>Objecting</u>		
00570/2/001 James Jamieson - It is considered that Policy CDP9, in its current form, is not strong enough to provide a sufficient level of protection for the historic environment.		
00621/6/001 Scottish Government - It is considered that Policy CDP9, in its current form, is not strong enough to provide a sufficient level of protection for the historic environment. Policy CDP9 does not provide a very robust or clear policy framework for the assessment of developments that impact on the historic environment and Historic Scotland is concerned that the policy has not been cross referenced with the associated statutory Supplementary Guidance that the Council intend to adopt or to the existing single Supplementary Planning Guidance for The Frontiers of the Roman Empire (Antonine Wall) World Heritage Site.		
00621/13/001 Scottish Government - This representation is linked to Representation 00621/6/001. If the suggested policy word change to CDP9, which has been put to the Reporter in 00621/001, is accepted then this representation will be withdrawn.		
If the policy word change is not accepted then Policy CDP9, as it currently stands, would provide an insufficient level of protection for the following sites which have a historic environment interest. These sites contain important listed buildings or share a boundary with scheduled sections of the Forth and Clyde Canal:		
<ul style="list-style-type: none"><li>• Site 1228 A/B/C Govan Graving Docks</li><li>• Site 2923 Ruchill Hospital (A,B and C)</li></ul>		

- Site 0531 A/B/C Water Row
- Site 3645 Maryhill Locks
- Site 4420C Slatefield Street
- Prop0020 Sandbank Street
- Prop0024 Cadder

### Supporting

00637/16/001 Dowanhill Hyndland and Kelvinside Community Council - Support for the terminology used in Policy CDP9 in relation to the 'Historic Environment', 'Heritage' and 'the West End' which denotes their importance.

00637/33/001 Dowanhill Hyndland and Kelvinside Community Council - Support for the specific reference to the West End in Policy CDP9 and the retention of Policy DES3 as Supplementary Guidance

### Listed Buildings

#### Objecting

00479/21/002 Hillhead Community Council - Seeks retention of the Grade C listed Church Street school, together with its swimming pool and curtilage walls and metal work which provides a number of benefits to the local area in terms of open space and as a focal point for the area.

00479/23/001 Hillhead Community Council - Concerns raised that only Scheduled Monuments, and not Listed Buildings, are shown on Figure 17 Policy Context Diagram. Listed Buildings are crucial to heritage and need to be detailed in the Plan.

00442/3/002 Glasgow Centre for Population Health - Concern over the lack of guidance relating to the issue of derelict listed buildings that are no longer fit for purpose and are having an adverse effect on communities.

### Potential Conservation Area Boundary Revisions

#### Objecting

00457/3/001 United Wholesale (Scotland) Ltd - The removal of the Bowling Club at Maxwell Road/Kenmure Street from East Pollokshields Conservation Area is sought on the grounds that the site does not merit the importance that the conservation area status brings with it in terms of townscape or landscape character.

00570/4/001 James Jamieson, 00571/2/001 Jim Craig - Extension of the Glasgow West Conservation Area (or a new Conservation Area designated) to include at least the area between and including Great Western Road and Whittingehame Drive. This extension is proposed on the grounds that the area is predominantly substantial sandstone dwellings, is an area of architectural and historic interest, includes numerous listed buildings and is of similar character to the existing conservation area. In addition, there are extensive areas of mature trees which form part of the townscape setting which would be better controlled as part of a Conservation Area, as would demolition and redevelopment generally. The design quality of the redevelopment of the adjacent hospital would likely be improved by being located beside a Conservation Area.

<p>00578/1/001 Royal Mail Group - Suggested realignment of the Proposed Broomhill Conservation Area boundary at Churchill Drive to ensure the protection of the Royal Mail Group's existing development and any future development or improvements that the Royal Mail seeks to make at this location. The landscaped area provides a more appropriate setting for the Proposed Conservation Area and acts as a buffer to the business/light industry on the south of Clarence Drive.</p> <p>00634/3/001 Dennistoun Community Council - Proposed extension to Dennistoun Conservation Area to include 'the Drives' between Duke Street and Alexandra Parade and to connect with the Necropolis and City Centre Conservation Area. This is in line with the Dennistoun Conservation Appraisal (June 2005) recommendations.</p> <p>00479/25/001 Hillhead Community Council - Concern that Glasgow University is not shown as a Conservation Area. Request for Glasgow University to be included either within Hillhead Conservation Area, or specifically designated as a Conservation Area in its own right.</p> <p><u>Supporting</u></p> <p>00149/1/001 Roy Hamdy - Support for Broomhill Conservation Area proposal.</p>
<p><b>Modifications sought by those submitting representations:</b></p>
<p><u>Historic Environment Policy Wording</u></p> <p>00570/2/001 James Jamieson - Suggested text changes to Policy CDP9 - Historic Environment as follows, the addition of the word 'protect' and a change in tone from 'the Council is unlikely to support' to 'the Council will not support'</p> <p>00621/6/001 Scottish Government - Historic Scotland would prefer the Council to have specific policy principles for the individual historic environment assets. However, as a minimum, Historic Scotland would request that text changes be undertaken to CDP9 as follows:</p> <p>'The Council will protect, preserve and, where appropriate, conserve and/or enhance the historic environment, in line with Scottish Planning Policy/Scottish Historic Environment Policy and this CDP policy together with its associated Supplementary Guidance (SG), for the benefit of our own and future generations. For clarity, historic environment encompasses in this context world heritage sites, listed buildings, conservation areas, scheduled monuments, archaeological sites, Inventory and non-Inventory gardens and designed landscapes and Inventory battlefields. The Council will assess the impact of proposed developments that affect historic environment features and/or their settings according to the principles set out in relevant SG. The Council will not support development that would have an adverse impact on the historic environment, unless SG criteria are fully satisfied. Figure 17 illustrates the extent of designated historic environment assets. Historic Environment Supplementary Guidance addresses the following: Archaeology/Scheduled Monuments, Frontiers of the Roman Empire (Antonine Wall) World Heritage Site, Listed Buildings, Conservation Areas, Gardens and Designed Landscapes, Historic Battlefields, Placemaking and Design.'</p> <p>00621/13/001 Scottish Government - None</p>

**Listed Buildings**

00479/21/002 Hillhead Community Council - The Plan should provide for the retention of the Grade C listed Church Street school, together with its swimming pool and curtilage walls and metal work.

00479/23/001 Hillhead Community Council - A map/details of listed buildings to be included in the Plan.

00442/3/002 Glasgow Centre for Population Health - Policy CDP9 should provide clear guidance on how the Council will address the issue of derelict listed buildings that are no longer fit for purpose.

**Potential Conservation Area Boundary Revisions**

00457/3/001 United Wholesale (Scotland) Ltd - The removal of the Bowling Club at Maxwell Road/Kenmure Street from East Pollokshields Conservation Area.

00570/4/001 James Jamieson, 00571/2/001 Jim Craig - Proposed extension of the Glasgow West Conservation Area (or a new Conservation Area designated) to include at least the area between and including Great Western Road and Whittingehame Drive.

00578/1/001 Royal Mail Group - Realignment of the Proposed Broomhill Conservation Area boundary at Churchill Drive.

00634/3/001 Dennistoun Community Council - Proposed extension to Dennistoun Conservation Area to include 'the Drives' between Duke Street and Alexandra Parade and to connect with the Necropolis and City Centre Conservation Area.

00479/25/001 Hillhead Community Council - Request for Glasgow University to either be included within Hillhead Conservation Area or specifically designated as a Conservation Area in its own right.

**Summary of responses (including reasons) by planning authority:****Historic Environment Policy Wording****Objecting**

00570/2/001 James Jamieson, 00621/6/001, 00621/13/001 Scottish Government - These representations appear to raise valid concerns in relation to the level of protection for the Historic Environment afforded by Policy CDP9 in its current form. There is an opportunity to amend Policy CDP9 to provide a stronger policy framework for the assessment of development that has the potential to impact on Glasgow's historic environment.

In addition, there is the opportunity to improve the cross referencing between Policy CDP9 and the Historic Environment Supplementary Guidance, which will be adopted alongside the Plan, and to provide further detail on the scope and content of the Historic Environment Supplementary Guidance.

The Reporter could, if so minded, amend Policy CDP9 to read: 'The Council will protect, preserve and, where appropriate, conserve and/or enhance the historic environment, in



line with Scottish Planning Policy, Scottish Historic Environment Policy, and this policy together with associated supplementary guidance (SG), for the benefit of our own and future generations. For clarity, historic environment encompasses, in this context, world heritage sites, listed buildings, conservation areas, scheduled monuments, archaeological sites, Inventory and non-Inventory gardens and designed landscapes and Inventory battlefields. The Council will assess the impact of proposed developments that affect historic environment features and/or their settings according to the principles set out in relevant SG. The Council will not support development that would have an adverse impact on the historic environment, unless SG criteria are fully satisfied. Figure 17 illustrates the extent of designated historic environment assets, with the exception of listed buildings (which is available online).

Historic Environment Supplementary Guidance will set out Design Guidance for:

- Listed Buildings and Unlisted Buildings in Conservation Areas (and will include Works Affecting the Exterior of Listed Buildings and Unlisted Buildings in Conservation Areas, Alterations to the Interiors of Listed Buildings, Development in the Curtilage of Listed Buildings and Properties in Conservation Areas including new buildings, Development Affecting the Setting of Listed Buildings and Properties in Conservation Areas, Maintaining Listed Buildings and Properties in Conservation Areas and Article 4 Directions Affecting Conservation Areas)
- Sites of Archaeological Importance
- Ancient Monuments and Scheduled Ancient Monuments

The Frontiers of the Roman Empire (Antonine Wall) World Heritage Site Supplementary Planning Guidance produced by Historic Scotland will be adopted as statutory Supplementary Guidance alongside the Plan. This Guidance provides advice for developers, decision makers and the general public and will be a material consideration in the assessment and determination of planning applications affecting the Antonine Wall and its setting.'

### Listed Buildings

### Objecting

00479/21/002 Hillhead Community Council - The purpose of Policy CDP9 is to protect, preserve and enhance Glasgow's historic environment. In response to representations received, it has been acknowledged that there is an opportunity to amend Policy CDP9 to provide a stronger policy framework for the assessment of development that has the potential to impact on Glasgow's historic environment, including listed buildings.

In addition, there is the opportunity to improve the cross referencing between Policy CDP9 and the Historic Environment Supplementary Guidance, which will be adopted alongside the Plan, and to provide further detail on the scope and content of the Historic Environment Supplementary Guidance (which includes, amongst other things, Design Guidance for Listed Buildings).

The Reporter could, if so minded, amend Policy CDP9 to read: 'The Council will protect, preserve and, where appropriate, conserve and/or enhance the historic environment, in line with Scottish Planning Policy, Scottish Historic Environment Policy, and this policy together with associated supplementary guidance (SG), for the benefit of our own and future generations. For clarity, historic environment encompasses, in this context, world heritage sites, listed buildings, conservation areas, scheduled monuments, archaeological

sites, Inventory and non-Inventory gardens and designed landscapes and Inventory battlefields. The Council will assess the impact of proposed developments that affect historic environment features and/or their settings according to the principles set out in relevant SG. The Council will not support development that would have an adverse impact on the historic environment, unless SG criteria are fully satisfied. Figure 17 illustrates the extent of designated historic environment assets, with the exception of listed buildings (which is available online).

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- Sites of Archaeological Importance
- Ancient Monuments and Scheduled Ancient Monuments

The Frontiers of the Roman Empire (Antonine Wall) World Heritage Site Supplementary Planning Guidance produced by Historic Scotland will be adopted as statutory Supplementary Guidance alongside the Plan. This Guidance provides advice for developers, decision makers and the general public and will be a material consideration in the assessment and determination of planning applications affecting the Antonine Wall and its setting.'

00479/23/001 Hillhead Community Council - It is not feasible to include a City wide map of listed buildings in Glasgow within the Plan. This detailed information is subject to regular change and is available online.

No modifications recommended.

00442/3/002 Glasgow Centre for Population Health - The Council has a dedicated Built Heritage officer who works on Buildings at Risk in Glasgow. The Council is, and will continue to work proactively, to address issues of disrepair of Buildings at Risk and encourage the positive re-use of derelict, listed buildings. This issue will be covered within the more detailed Historic Environment Supplementary Guidance.

No modifications recommended.

#### Potential Conservation Area Boundary Revisions

##### Objecting

00457/3/001 United Wholesale (Scotland) Ltd, 00570/4/001 James Jamieson, 00571/2/001 Jim Craig, 00578/1/001 Royal Mail Group, 00634/3/001 Dennistoun Community Council, 00479/25/001 Hillhead Community Council - Conservation Areas were introduced by the Civic Amenities Act 1967. The Planning (Listed Buildings and Conservation Area) (Scotland) Act 1997 (*CE14*) provides the current legislative framework for the designation of Conservation Areas and not the local development plan system. The Act requires all planning authorities to determine which parts of their area merits Conservation Area status. Glasgow currently has 24 Conservation Areas varying in

character from the City Centre and Victorian residential suburbs to a rural village and former country estate.

To determine whether an area merits Conservation Area status, a Conservation Area Appraisal must be prepared. The purpose of a Conservation Area Appraisal is to define what is important about its character and appearance. It is also a vital tool to enable the active management of the Conservation Area. It identifies the area's special features and changing needs through a process which includes researching its historical development, carrying out a detailed townscape analysis and preparing a character assessment. Twenty Conservation Area Appraisals have been approved by the City Council.

Conservation Appraisals also provide the opportunity to determine potential Conservation Area boundaries, to make certain that they accurately reflect what is of special interest and ensure that they are logically drawn. Conservation Area Appraisals should be regarded as supplementary to the policies set out in the Proposed City Development Plan.

00457/3/001 United Wholesale (Scotland) Ltd - East Pollokshields Conservation Area Appraisal (OC8) was approved in 2011 following public consultation. The Appraisal included the opportunity to review boundaries. It was not agreed at this time that the Bowling Club at Maxwell Road/Kenmure Street should be removed from East Pollokshields Conservation Area.

No modifications recommended.

00570/4/001 James Jamieson, 00571/2/001 Jim Craig - Glasgow West Conservation Area Appraisal (OC9), and associated public consultation, fully considered and reviewed boundaries in 2011. Claythorn and Anniesland have been reviewed in the past as part of a City wide study looking at new possible Conservation Areas and discounted.

No modifications recommended.

00578/1/001 Royal Mail Group - The proposed boundary realignment forms part of the formal consultation on the proposed Broomhill Conservation Area (OC5). This representation has been noted and will be considered as part of that process. Designation will be subject to the outcome of the consultation.

No modifications recommended.

00634/3/001 Dennistoun Community Council - Dennistoun Conservation Area Appraisal (OC7) was completed in 2005 following public consultation and it included the opportunity to review boundaries. It was not agreed at this time to extend the boundary to include 'the Drives'

No modifications recommended.

00479/25/001 Hillhead Community Council - The University and surrounding area is not included within Glasgow West Conservation Area. There are no plans to include the University as part of Glasgow West Conservation Area nor to designate it as a Conservation Area in its own right.

No modifications recommended.

**Reporter's conclusions:**Historic Environment Policy Wording

1. I agree with the Scottish Government and James Jamieson that Policy CDP9 in its current form is unclear and does not provide the appropriate level of protection for the historic environment. The phrase “the council is unlikely to” is not strong enough to convey the protection which should be afforded to historic assets. It is also too general in nature, and makes no reference to world heritage sites (e.g. the Antonine Wall) or battlefield sites. Moreover, the link with supplementary guidance is not specified.

2. Scottish Planning Policy (SPP) advises that local development plans and supplementary guidance should provide a framework for protecting and, where appropriate, enhancing all elements of the historic environment. SPP also gives policy guidance for each of the elements, including listed buildings, conservation areas, scheduled monuments, world heritage sites, gardens and designed landscapes, battlefields, archaeology and other historic environment assets. Further detailed guidance is contained in Scottish Historic Environment Policy (SHEP).

3. Policy CDP9 requires to fully reflect the Scottish Government's policy for the historic environment, that there should be a presumption in favour of the preservation of individual historic assets, and to acknowledge the statutory protection afforded to historic environment designations.

4. I note that the council accepts the criticisms of the policy, and is happy for it to be amended broadly as the Scottish Government suggests. On that basis there is no need to consider the Scottish Government's secondary objection which only applies if Policy CDP9 is unchanged. However, the council's suggested revised wording does not include gardens and designed landscapes and historic battlefields in the list of topics to be covered in supplementary guidance – an omission I propose to remedy in my recommendation below.

Listed Buildings

5. In relation to the objection by Hillhead Community Council, the Proposed Plan is not the appropriate vehicle to take decisions on the future of individual buildings, such as the C-listed Church Street school. However, I am satisfied that the revised terms of Policy CDP9, together with the associated supplementary guidance, will provide a more robust framework to assess proposals affecting listed buildings, including derelict listed buildings, in the City.

6. I accept that it would not be practicable to include a list or map of all the listed buildings in the City within the Proposed Plan, because they are so numerous and the list will change over time. In any case this information is readily available online via the Historic Environment Scotland website.

Potential Conservation Area Boundary Revisions

7. Figure 17 of the Proposed Plan records the existing conservation areas in the City, which have been designated by the council under the powers given in Civic Amenities Act 1967 (now the Planning (Listed Buildings and Conservation Area) (Scotland) Act 1997). The conservation area designation process is separate to the production of the local

development plan, and follows the preparation of a comprehensive conservation area appraisal. It is therefore difficult to assess a request for a piecemeal change to a conservation area boundary as part of the examination of the Proposed Plan.

8. I note that the boundary of East Pollokshields Conservation Area was reviewed in 2011, with public consultation, as part of the preparation of the conservation area appraisal. The appraisal reaffirmed the boundary which included the former bowling club site at Maxwell Road, and I see no reason to question that judgement at this stage. However, conservation area designation is not in itself an embargo on all development, and any proposal for development in this area would be assessed against the terms of policy CDP9 and the associated supplementary guidance.

9. Similarly, there was a boundary review of the Glasgow West Conservation Area in 2011 as part of a conservation area appraisal (with consultation), which extended the conservation area in six specific areas. The appraisal, which runs to 154 pages, is a comprehensive study of the history, character and appearance of the conservation area, and measures for its preservation and enhancement. I therefore accept the council's position that it would be inappropriate to extend the conservation area at this stage.

10. I note that Royal Mail Group have made a representation about the boundary of the Proposed Broomhill Conservation Area in response to consultation on the Draft Conservation Area Appraisal 2015. I consider that that is the appropriate process to consider the merits or otherwise of their request to move the boundary away from their premises.

11. Although the conservation area appraisal of the Dennistoun Conservation Area was produced in 2005, that comprehensive assessment concluded that the boundary should not be extended to include 'the Drives', and I am unaware of any new evidence which would change that assessment.

12. The council has no proposal to designate Glasgow University as a Conservation Area. Given that many or most of the university buildings are listed in their own right, I can see little advantage in conservation area designation here.

#### Supporting representations

13. I note the representations made in support of the Proposed Plan which are summarised above, but they do not raise any unresolved issues which I require to examine.

#### **Reporter's recommendations:**

Modify Policy CDP9 to read:

*"The Council will protect, preserve and, where appropriate, conserve and/or enhance the historic environment, in line with Scottish Planning Policy, Scottish Historic Environment Policy, and this policy together with associated supplementary guidance (SG), for the benefit of our own and future generations. For clarity, historic environment encompasses, in this context, world heritage sites, listed buildings, conservation areas, scheduled monuments, archaeological sites, Inventory and non-Inventory gardens and designed landscapes and Inventory battlefields. The Council will assess the impact of proposed developments that affect historic environment features and/or their settings according to*

*the principles set out in relevant SG. The Council will not support development that would have an adverse impact on the historic environment, unless SG criteria are fully satisfied. Figure 17 illustrates the extent of designated historic environment assets, with the exception of listed buildings (which is available online).*

*Historic Environment Supplementary Guidance will set out Design Guidance for:*

- *Listed Buildings and Unlisted Buildings in Conservation Areas (and will include Works Affecting the Exterior of Listed Buildings and Unlisted Buildings in Conservation Areas, Alterations to the Interiors of Listed Buildings, Development in the Curtilage of Listed Buildings and Properties in Conservation Areas including new buildings, Development Affecting the Setting of Listed Buildings and Properties in Conservation Areas, Maintaining Listed Buildings and Properties in Conservation Areas and Article 4 Directions Affecting Conservation Areas)*
- *Sites of Archaeological Importance*
- *Ancient Monuments and Scheduled Ancient Monuments*
- *Gardens and Designed Landscapes*
- *Historic Battlefields*

*The Frontiers of the Roman Empire (Antonine Wall) World Heritage Site Supplementary Planning Guidance produced by Historic Scotland will be adopted as statutory Supplementary Guidance alongside the Plan. This Guidance provides advice for developers, decision makers and the general public and will be a material consideration in the assessment and determination of planning applications affecting the Antonine Wall and its setting."*

Issue 17	Meeting Housing Needs	
Development plan reference:	Policy CDP 10 Meeting Housing Needs (Pages 53-55)	Reporter: Sinéad Lynch/ Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
<div>Muriel Pearson (00143) Comstock (00406) Miller Homes (00417) Alan McArthur (00419) Population Health (00442) Tron St Mary's Church [Chance To Thrive] (00443) Scottish Allotments and Gardens Society (00453) The University Of Glasgow (00474) Hillhead Community Council (00479) Persimmon Homes (00497) Wheatley Group (00501) Bob Doris MSP (00566) Scottish Natural Heritage (00574) Gladman Developments Ltd (00576) The Possil Estate (00579) NHS Greater Glasgow And Clyde (00592) Homes For Scotland (00602) Dandara Ltd (00604) Laurieston Developments (00617)</div> <div>Scottish Government (00621) Yorkhill and Kelvingrove Community Council (00623) Barrett Homes West Scotland (00627) Gartloch Developments Ltd In Administration (00628) Christ's Hospital Foundation (00631) Caledonian Properties Ltd/Taylor Wimpey (00632) Strathclyde Partnership for Transport (00633) Dennistoun Community Council (00634) Dowanhill Hyndland and Kelvinside Community Council (00637) Pollok &amp; Corrour Ltd (00643) Clyde Gateway URC (00664) McCarthy &amp; Stone Retirement Lifestyles Ltd (00668) West Dunbartonshire Council (00806) Scottish Property Federation (00818)</div>		
Provision of the development plan to which the issue relates:	Policy CDP 10 - Meeting Housing Needs is one of ten detailed policies in the Plan which contributes in part to meeting the requirement of the two overarching policies. Policy CDP 10 seeks to ensure that the City's growing and diverse population has access to a choice of housing of quality and affordability across all tenures.	
Planning authority's summary of the representation(s):		
<u>Meeting Housing Needs Policy Wording</u>  <u>Objecting</u>  00453/14/001 Scottish Allotments and Gardens Society - Clear table of housing need that can be fulfilled by existing planning permission for brownfield and green field site Greenfield sites will only be considered when the brownfield opportunities have been exhausted.  We find it difficult to understand how this section sits with the excellent concept of placemaking and engagement with the local community. Also the relation of the SEA and the housing schedule reports with the CDP. Our belief is that it is less costly for Developers to build on greenfield sites. This will leave the inner city areas with a legacy		

of brownfield sites. Good place-making with new developments and associated communal growing areas will regenerate the city. However these may need the restoration of the land. Green belt sites: Carmunnock has 5.49ha designated in the SEA but only an indicative capacity of <50 houses. Darnley has 2.41 ha designated in the SEA but only an indicative capacity of 30 houses. Auchinairn Road has 13.84 ha designated in the SEA but only an indicative capacity of <50 houses. This means that 22ha of Greenbelt will be lost for less than 120 houses.

00576/1/001 Gladman Developments Ltd - The wording of bullet point 2 in Policy CDP 10 should be amended for the following reasons:

CDP 10 indicates that should the 5 year supply not be maintained, the reasons will be assessed and additional sites will only be identified where it appears there is a supply-side issue. The Policy Background Paper shows that the Council wishes to avoid identifying additional sites which will not be progressed due to mortgage/funding restrictions and consequently, will only release additional sites when there is a supply issue. The precision with which a "supply-only" issue can be identified is questionable.

The assessment of supply side factors affecting the 5 year land supply adds unneeded complexity. It would be difficult to separate demand and supply factors in a transparent manner. The approach in Strategy Support Measure 10 (SDP) is for supply to be augmented by sites which are free of infrastructure constraints and deliverable in the next 5 years, which is the basis of the effectiveness test in PAN 2/2010. Requesting proof a site was deliverable is an established approach in SPP and PAN 2/2010 and is a proven way of ensuring sites are only released where there is demonstrable demand.

00621/14/001 Scottish Government – There is no mention in the Plan of how Glasgow City Council proposes to address the needs of Gypsies, Travellers and Show People. We trust this is because the SDP HNDA confirmed there was no need for such types of housing, however, if this is not the case, suitable provisions should be inserted in the Plan (see paragraph 133 of SPP 2014).

00621/14/002 Scottish Government – We consider that further clarity could be given in the Plan as to whether the surplus NHS locations (as identified in Policy CDP 10) form part of the housing land supply.

00634/1/001 Dennistoun Community Council - Increased focus required to support redevelopment of brownfield sites, with a specific emphasis on sites in North East Glasgow. The Plan should be a proactive lever in aiding and informing work to 're-balance' Glasgow - including support for developments which may act as a catalyst for enabling neighbourhood growth and "the preservation and enhancement of residential amenity and neighbourhoods..." as these "...Are important to the quality and success of the city".

The Plan presents an opportunity to focus on undeveloped brownfield sites in North East Glasgow - particularly in the context of development linked to Commonwealth Games activity. Dennistoun is particularly under-represented in relation to proposed development. The correlation between under and un-developed sites (including brownfield sites) and the high proportion of North East Glasgow datazones in the lowest 15% of SIMD is significant.



The Plan should be the vehicle to enable support for community-led regeneration. Communities should be encouraged to create alternative uses for sites where the Council perceives little scope for immediate development. Reference to Stalled Spaces is welcome and should be expanded.

00664/3/001 Clyde Gateway URC - Clyde Gateway should be mentioned as an area which supports housing needs and as an area where housing investment should be directed.

The former power station site in Dalmarnock is missing from the housing land supply plan on page 54, as are the future phases of the Commonwealth Games Village and the former Belvidere hospital site, in general given the amount of vacant land in Clyde Gateway there seems to be an under representation of housing opportunities.

00668/1/001 McCarthy & Stone Retirement Lifestyles Ltd - The current and future housing needs of older people in Glasgow should be positively addressed within the emerging City Development Plan.

Scottish Planning Policy advises on the need for specialist provision that covers accessible and adapted housing and supported accommodation, including care homes and sheltered housing. Glasgow has a comparatively young population, however, a significant proportion of the population of the City is aged sixty and over. The provision of adequate support and accommodation for this demographic is, therefore, a significant challenge. Unless properly planned over the next 20 years, there is likely to be a serious shortfall in specialist accommodation for the older population.

Policy CDP 10 highlights the historical difficulty in delivering housing on brownfield sites within Glasgow. Despite the economy recovery, in many instances the viability of development on such sites is marginal. Given the existing difficulties with the viability of development, however, the Council should not seek affordable housing contributions from specialist accommodation for the elderly to encourage further development of this nature.

00602/3/003 Homes for Scotland, 00497/5/001 Persimmon Homes:

1. The proposal that release sites should be developed within one year of consent is unrealistic.
2. The Council must identify additional allocation capable of meeting the SDP housing land requirement in full (plus generosity allowance) and that contributes to maintaining a 5 year land supply at all times. The Council must assess all proposed allocations to identify their effectiveness in accord with PAN 2/2010.

In addition, the Council must plan for the full SDP requirement plus generosity and release sites from the Green belt which are not subject to national designations. Sites with local designations should be reassessed against all the aims and objectives of the Plan, not just environmental.

00627/3/001 Barrett Homes West Scotland - The wording of the policy in relation to a planning condition requiring development to commence within one year of planning permission being granted is considered to be overly prescriptive, and in many cases unfair and unreasonable where there are issues to be resolved prior to development being commenced.

As some of the detail which would have allowed further comment on The Plan is expected to be contained in Supplementary Guidance, and this has yet to be prepared, the right to comment on this is reserved.

00574/12/001 Scottish Natural Heritage - Page 53 Policy CDP 10- Meeting Housing Needs. We believe that the green belt release sites are very sensitive in terms of their potential natural heritage impact. To minimise and mitigate the natural heritage impacts we believe that the additional greenbelt release sites, including any release to the north of Summerston, need to take a design led approach. This is backed up by para 55 of the SPP 2014 "Local development plans should contribute to high quality places by setting out how they will embed a design-led approach. This should include specifying when design tools, such as those at paragraph 57 should be used "It is our view that this design led approach would be best achieved through the preparation of detailed development briefs and/or masterplans for these sensitive sites. We would be keen to be involved in the development of these development briefs/masterplans. It will be particularly important to create and/ or enhance a defensible boundary and fully consider aspects such as green infrastructure, access and recreation and biodiversity to ensure a holistic approach

00631/3/001 Christ's Hospital Foundation - Support is given for the aim of Policy CDP 10, however this Policy should provide support for the use of windfall sites and specifically the re-use of underutilised EDAs. Explicit reference should be made to the re-use of appropriate vacant and derelict land, brownfield and underutilised EDA sites as potential locations for residential development. Furthermore, this Policy should support the Sustainable Spatial Strategy as outlined in Policy CDP 2, and be consistent with paragraph 80 of the SPP.

00633/17/001 Strathclyde Partnership for Transport - Acknowledging that all 12 policies are to be read in conjunction with each other, we consider it necessary to make reference to transport accessibility in relation to this policy. This is of particular importance when considering the infrastructure provision for the Community Growth Areas. This is to ensure that transport accessibility is considered at the heart of major housing developments.

Policy CDP4 refers to the provision of local shopping facilities as part of developments which are more than 800m from local centres. The timing of the provision of such services within large scale housing development areas is key to meeting the needs of early residents of the site.

In order to acknowledge the relationship between public transport accessibility, active travel arrangements, parking and the provision of housing, it is suggested that supplementary guidance on Access, Transport Assessments, Public Transport and Parking be added to this policy.

00442/4/001 Glasgow Centre for Population Health - The increased need for housing over the next 25 years should be considered in relation to shifts in demographic trends, in particular the rising elderly population.

00806/4/001 West Dunbartonshire Council - In terms of housing land, the Plan should focus housing development on brownfield land, reflecting the regeneration priority of the City Council and adjoining authorities.

Schedule of Housing ProposalsObjecting

00621/14/003 Scottish Government – We consider it would be useful if the Schedule of Housing Proposals identified site capacities to set out the relationship between the proposals themselves and the identified Housing Supply Target.

Housing Land SupplyObjecting

00501/4/001 Wheatley Group - This policy in general, is supported as it contributes to the provision of affordable and mid-market rent housing in the City. However the capacity of sites in the schedule of proposals appears to be insufficient to meet the affordable sector targets set out in Table 4. There is a need to identify more affordable housing sites. The Wheatley Group is in discussion with Glasgow City Council on whether owner-occupied sites may be considered for affordable housing.

The Group has issued a £200m bond, with a view to attracting other investment in Glasgow's housing. It is anticipated that the Group will deliver around 3,500 new houses over the next seven years, and this needs to be matched by sufficient land supply. The Group also considers that balanced communities may be created by including an element of affordable housing within owner-occupied sites, including larger sites.

The climate for first time buyers is expected to remain difficult, as Help to Buy ends and interest rates rise. In this context, it is noted that despite the significant increase in private rented housing, this sector is not recognised as a tenure in the schedule of proposals. The Group is committed to increasing the supply in this area, by means of mid-market and market rent housing.

00627/3/002 Barrett Homes West Scotland - Additional sites should be identified and added to the housing land supply, in relation to the shortfalls shown in Table 4 against the SDP indicative requirement for the periods to 2020 and 2025. This would be in compliance with Scottish Planning Policy, which requires authorities to identify a generous land supply to meet housing requirements.

00497/14/001 Persimmon Homes - Additional sites should be released within sustainable and appropriate greenbelt locations in order to aspire to meeting the SDP housing supply target. The Green Belt Review was not carried out to inform a balanced decision-making process evaluating the pros and cons of Green belt release - economic and social objectives have not been weighed against the environmental ones, resulting in a failure to deliver on the wider aims and outcomes of the Plan relating to housing growth.

00479/17/001 Hillhead Community Council - Objection to the imbalance of land allocated for private housing development and housing association development. Concern regarding management of private rented and housing association properties.

## Housing Supply Target/Housing Land Requirement

### Objecting

00576/2/001 Gladman Developments - The City Development Plan identifies a land supply for the private and affordable sectors, and is clear that these do not meet the Strategic Development Plan requirements in full. The reasons for this are explained in the Plan, and include optimistic household projections, weaker demand for housing, and the consideration that greenfield release would undermine the objectives of the Plan to deliver brownfield development and a sustainable city.

The CDP notes that the land supply and urban capacity study are being updated, and that therefore the housing target will change.

The figures for the private sector differ by 1,001 units between the Policy and the Background Paper. The Plan does not appear to set out a Housing Supply Target or a Housing Land Requirement, and is therefore not in compliance with SPP. It states that annual monitoring of land supply, household formation, tenure change and completions will allow the Council to respond to any land requirements.

There is insufficient clarity as to the figure which the Council will measure performance against the targets set out in the SDP, and whether other sites would be sought in the case of sites becoming constrained and moving out of the supply.

00621/4/001 Scottish Government - The Plan should clearly set out the updated Housing Supply Targets together with an explanation of how these were derived and whether a generous supply of effective land for housing is provided by the Plan.

There is no clear housing supply target/housing land requirement, for the Plan period, set out in the Plan. Overall, we found the presentation of information relating to Housing Supply Targets (HSTs) to be confusing and consider the Plan should provide greater clarity and further explanation on this matter.

In particular, Table 4 of the Plan - Addressing All Housing Tenure Requirements lists the Housing Supply Targets set out at the SDP HNDA stage. The context narrative around Policy CDP 10 states that these requirements have been re-considered, however, there is no corresponding table in the Plan to identify what the updated Housing Supply Targets, or land supply required to meet these, actually are.

00602/3/001 Homes for Scotland - The policy does not comply with Scottish Planning Policy, in that it does not specify how it intends to meet the housing requirements set out in the Strategic Development Plan, and fails to include an allowance for generosity. It sets out various reasons as to why SDP requirements should not be met.

There is an over-reliance on sites in non-marketable locations, on flatted sites, on sites with no planning permission or named developer, and on sites in the urban capacity study. This represents a considerable uncertainty over the potential for these sites to progress.

The policy relies on a green belt review which failed to balance the economic and social advantages of increasing the land supply with environmental objectives. Delays in family housing sites coming forward in green belt locations are due to the planning process, not

lack of demand.

The policy identifies release in three locations, with a combined capacity of less than 130 houses, compared to a shortfall of 6,761 houses.

Homes for Scotland disagrees with the Plan's response to housing need and demand, and considers that an alternative approach is required.

#### Housing Sites Allocated in the Proposed Plan

##### Objecting

00501/3/001 Wheatley Group - Support for the Plan's greenbelt policy which encourages the re-use of brownfield land and the promotion of a compact city form but concern over the potential extent of greenfield land release on the grounds that infrastructure investment is limited and the focus should be on enabling the development of stalled brownfield sites rather than facilitating greenfield land release. Concerns are exacerbated by the fact that some of the greenfield sites are close to areas of land lying undeveloped following the demolition of low demand housing.

##### Gartloch Farm

00628/1/001 Gartloch Developments Ltd In Administration - Object to this Policy, on the basis that references to a site for 300 houses at Gartloch Farm should be consistent throughout the document in terms of supporting its release from the Green Belt, and its suitability for inclusion in the Plan and the Housing Land Supply. This will give confidence to the market that development conforms with development plan policy.

In 2009, the Council resolved to grant planning permission subject to a Section 75 Agreement relating to the delivery of roads infrastructure and land and funding for wetlands as part of a proposed Local Nature Reserve. The Section 75 was drafted, but not completed. A marketing programme has been developed, and the site continues to be an effective short-medium term development opportunity.

Development would be consistent with the objectives of the Sustainable Spatial Strategy, as well as Policy CDP 10: Meeting Housing Needs.

There is concern regarding Policy references to reductions in the housing land supply, and a focus on brownfield sites in preference to greenfield. The Policy is also not clear that sites with planning permission are supported.

The landowner wishes to work with the Council to fulfil the potential of the site, and to achieve associated benefits for local communities.

#### Housing Sites Not Allocated in the Proposed Plan

##### Objecting

##### Ruchazie

00143/3/001 Muriel Pearson - There is a concentration of vacant and derelict land in Ruchazie, which exceeds the Glasgow average. This should be identified for

development/regeneration.

#### Mid Netherton Farm

00406/1/001 Comstock - The inclusion of a site at Mid-Netherton for housing is sought on the grounds that the site is in line with the Government's policy of providing a generous supply of housing land and Structure Plan housing targets and the Council has failed to provide enough viable sites to deliver these targets, with sites currently allocated not delivering supply or in the wrong places.

The site at Mid Netherton is an entirely appropriate, suitable and effective site (100 units could be developed in a single phase over 2-3 years) and a number of housebuilders are interested in developing the site. The site is in a sector of the City which is marketable but has no housebuilding activity.

The site is on poor quality urban fringe land which is declining alongside the viability of the farm and there is little prospect of agricultural activity taking place. A large portion of the site is brownfield and accommodates non-agricultural business related operations. In addition, the site is adjacent to public transport, there is no contamination and no deficit funding is required.

The environmental considerations identified in the SEA are overstated. In terms of the issues raised, a woodland belt buffer could provide a clear definable greenbelt edge with the development providing a natural rounding off of Glasgow. There would, therefore, be no encroachment or coalescence.

#### Leverndale Hospital – Site D

00417/1/001 Miller Homes - Objection to the non-inclusion of land at Leverndale Hospital Site D, Crookston for housing in the Plan on the grounds that the Council has failed to provide enough viable sites to deliver Structure Plan targets and housing sites have been allocated in the wrong locations and are unviable. This site represents an effective opportunity to create a quality housing opportunity in Crookston in line with National and Strategic Planning guidance and the site is fundamentally suitable for housing. In terms of its potential for future development, the site is in the ownership of a volume housebuilder with proven marketability in the area, is readily available for the development of approximately 100 units (single phase, 2-3 years), is in a location which supports the local economy and is directly linked by all forms of public transport, no deficit funding is required and there are no infrastructure constraints.

In terms of the environmental issues identified, an indicative site layout has been prepared which will ensure the Greenbelt is further consolidated, existing woodland managed and there is opportunity for informal and managed recreational space. The site can also be developed without coalescence issues arising with Renfrewshire Council and could effectively help to create an effective rounding-off at Crookston. The proposals do not involve development on land within the flood risk area and there are no known issues with contamination

The incorrect site has been assessed in the SEA (10.12ha instead of 3.6ha).

### Leverndale Hospital – Site F

00417/3/001 Miller Homes - Objection to the non-inclusion of land at Leverndale Hospital Site F, Crookston for housing on the grounds that the Council has failed to provide enough viable sites to deliver Structure Plan targets and housing sites have been allocated in the wrong locations and are unviable. The Council's Greenbelt Review concluded that only three sites should be released from the Greenbelt for housing. This site fully supports the requirement for additional greenfield release sites in Glasgow within 5 years.

In terms of future development potential, the site is in the ownership of a volume housebuilder with proven marketability in the area, is in the middle of a development zone (and its partial development would be a logical extension to the previous development at Leverndale Hospital) and could be developed in 4-5 years accommodating up to approximately 150 units. In addition, the site is in a location which supports the local economy and is directly linked by all forms of public transport, no deficit funding is required and there are no infrastructure constraints.

In terms of the environmental issues identified, an indicative site layout has been prepared which will ensure the Greenbelt is further consolidated (the site could effectively help to create an effective rounding-off at Crookston) and development of the site could offer the opportunity to improve access to and the condition of the ancient, long established and semi natural woodland. In addition, flood risk is not a significant issue and there are no known issues with contamination.

The incorrect site has been assessed in the SEA (26.75ha instead of 5.2ha).

### Hamilton Road, Mount Vernon

00419/1/001 Alan McArthur - The inclusion of a site at Hamilton Road, Mount Vernon for residential development sought, in conjunction with the retention and protection of a listed Dovecot building, on the grounds that this type of proposal would allow for the productive use of the site and would help to retain and maintain the listed structure, which is of historical significance, (Grade A Listed Building). This is an underutilised gap site and the present misuse of the site is not in the public interest. The proposal provides an opportunity to contribute to housing supply/needs, address placemaking and would help to deliver sustainable growth. In addition, sympathetic development would have no negative impact on the Green Network, the site is accessible and within easy reach of existing services and amenities, land to the east of the site has been allocated for housing (Prop088) and the site has two existing access points.

### Balmore Road/Hillend Road

00579/1/001 The Possil Estate - In summary, our client's land is considered to constitute an effective site for residential development and identification of the site within the housing land supply would assist in the Glasgow CDP meeting the housing land requirement identified in the GCV SDP.

The site has excellent accessibility to public transport and as a brownfield, infill site, within the urban area, benefits from access to existing schools, open space, community and leisure facilities. Delivery of this site for residential development of circa 86 dwellings would ensure the successful redevelopment of a derelict site within the Glasgow urban

area and could create a catalyst for regeneration and environmental improvement in the area. Overall the development of this site for residential uses would contribute to sustainable development, for which national planning policy seeks to support.

#### Auchinairn Road, Robroyston

00632/2/001 Caledonian Properties Ltd/Taylor Wimpey - Include a 24.5 hectare site to the south of Auchinairn Road in The Plan for housing development (indicative capacity of 300-500 houses). Part of the site has already been included in the Proposed Plan. The area is suitable for residential development, and would be a natural extension to Robroyston. Two development areas are identified on the attached masterplan, A and B, and these are capable of being delivered in the short to medium term. This would contribute towards the private sector shortfall to 2020.

Landscape and engineering appraisals concluded that development could be completed on the north facing western part of the site without impacting on the surrounding landscape, due to adjacent residential areas which provide context, and the rising topography to the east and north, which provides screening. Mitigation measures could provide a suitable landscape setting for the development, resulting in habitat creation, extension of woodland communities in the adjacent SINC, local biodiversity gains and allow removal of part of the site from the greenbelt without materially affecting its role of maintaining settlement separation.

Caledonian Properties/Taylor Wimpey are also promoting housing development on land identified on the masterplan within their ownership in the East Dunbartonshire Council area.

#### Damshot Crescent

00497/6/001 Persimmon Homes, 00643/1/001, 00643/2/001 Pollok & Corrour Ltd - Objection to Policy CDP 10 and the non-inclusion of a site at Damshot Crescent for residential development on the grounds that there are no issues raised in the Strategic Environmental Assessment (SEA) that cannot be mitigated through good design. The way in which the Masterplan has evolved, and will continue to evolve, will take account of any of the issues raised in the SEA. The Designated Gardens and site of Special Landscape Importance, reflect the site's former location within the Pollok Park and do not reflect current reality.

The site is a sustainably located housing release in a market which can support further development and has no demonstrable environmental or historical designations which should restrict development. There are no site constraints which would render this site ineffective. The site is within close proximity to public transport and local facilities and services. The development of the land would create a logical expansion for housing development. The site is in the hands of a recognised housebuilder who can guarantee delivery. Glasgow Council have not released sufficient housing units as part of the Proposed City Development Plan in order to meet housing targets as set through the Structure Plan.

#### Kennishead Farm

00643/3/001, 00643/4/001 Pollok & Corrour Ltd - Objection to Policy CDP 10 and the non-inclusion of Kennishead Farm as a housing site in the Plan on the grounds that there



are no issues identified in the Strategic Environmental Assessment that cannot be mitigated through good design. The way in which the Masterplan has evolved and will continue to evolve will take account of the issues raised in the Environmental Report. The Designated Gardens and Site of Special Landscape Importance reflect the site's former location within the Pollok Park and do not reflect the current use and status of this site which it is proposed to only partially develop, taking account of the ancient woodland and wetland areas.

The sites currently allocated are not delivering supply or are in the wrong place for meeting market demand. This site at Kennishead Farm is effective (see Section 4 of the Report).

This representation seeks the Council add Site 055 (MIR) at Kennishead Farm for private housing, as an effective opportunity for development within the first 5 years of the LDP.

The area at Kennishead Farm is effective in terms of Government Advice Pan 2/2010.

Pollok & Corrour object to the non-inclusion of land at Kennishead Farm as an effective opportunity to create an attractive housing site on the edge of Cowglen in line with National Planning and Strategic Planning guidance, vis:-

The Local Development Plan has not taken a flexible approach to identify land for all types of housing and, in particular, sites which are immediately available. There is a significant mismatch between effective supply and demand with a large number of sites in the wrong locations from a viability and marketability perspective. - There is a geographical mismatch of opportunity in the City and the south-west area has a dearth of viable marketable housing sites.

#### Temple Road

00617/1/001 Laurieston Developments - The site at Dalsholm Road/Temple Road, as shown on the submitted title plan, should be included as a development site.

The site currently has residential properties on it and a haulage contractor's yard. The business has now ceased operation and is environmentally hazardous. We believe that the inclusion of this site would mean that the site would be cleaned up and be more environmentally friendly and would improve the local environment.

#### Student Accommodation

##### Objecting

00637/17/001 Dowanhill Hyndland and Kelvinside Community Council - A caveat in the policy is required that states that the development of developer led purpose-built student accommodation must be avoided, to be instead masterplan-led. The recent explosion of incoherent developer led student accommodation at Partick/River Kelvin, without a master plan, is an example of how opportunities for best outcomes can easily be lost.

00479/14/001 Hillhead Community Council - Objects to the erection of any further purpose built student accommodation in the west end of Glasgow for a variety of reasons, including: less demand for such accommodation; poor design, especially in a conservation area; no beneficial effect in diminishing demand for HMOs. There should

not be an assumption that students are entitled to live where they choose if it is not in the interests of balanced communities. The load of accommodating students should be spread.

00566/5/001 Bob Doris MSP - In terms of purpose built private student accommodation, a more rigorous policy is required. This type of development has in some cases been at the expense of much needed affordable housing, particularly in communities in the west end of the city. Where these have been concentrated in one area, they are at risk of serving to reduce the coherence of their local communities by introducing a highly transient population. While student accommodation developments can, to a certain extent, reduce reliance on problematic HMOs, there needs to be a means of ensuring a balance between the demand for student accommodation and the wider needs of local communities.

00623/10/001 Yorkhill and Kelvingrove Community Council - Policy CDP10 states the need for 56,000 affordable homes by 2025. We would welcome the development of as many of these homes as possible within our area, which in recent years has seen the creation of new private homes and student accommodation at the expense of affordable permanent dwellings. Indeed we consider that the concentration of student accommodation within our area is already at saturation point and that any significant increase in the resulting shifting population with little opportunity for social contact and engagement with the permanent life of the area should now be actively discouraged in particular areas such as this.

#### Hotels/Hostels/Bed and Breakfast Establishments

##### Objecting

00479/28/001 Hillhead Community Council - CDP10 should exclude further hostels of any kind, further hotels/bed and breakfast establishment, reasons: Hillhead now has such a transient population that these are making an already difficult situation (resulting in HMO policy) even worse.

#### Houses in Multiple Occupation (HMO)

##### Objecting

00637/7/001 Dowanhill Hyndland and Kelvinside Community Council - Requests the expansion of the (City Plan 2/Draft SG) HMO Exclusion Area to include: both sides of Byres Road from Great Western Road to Highburgh Road; Ruthven Street, Roxburgh Street, Dowanside Road, Observatory Road, as far as the east side of Saltoun Street and Caledon Street; and Hyndland Road (both sides) from Highburgh Road to Novar Drive. The density of HMOs in the area specified is high, similar to that found in Hillhead and Woodlands, and so these areas should also be covered in the exclusion zone.

00637/18/001 Dowanhill Hyndland and Kelvinside Community Council - The Plan does not contain a specific reference to Council policy on HMOs nor does it outline specific guidelines on HMO's. In addition there is no reference within those guidelines to the licensing department not granting a licence until receiving confirmation that the property subject of the HMO had planning consent to be an HMO

The private rented sector, including the HMO element is inadequately regulated. High density private rented areas like the west end will suffer from long-term loss of amenity unless appropriate action is taken.

00479/28/002 Hillhead Community Council - The Plan should include adoption of the link between planning and licensing (Private Rented Sector Bill). This was inserted into the bill because landlords were and are still operating in defiance of the need for change of use consent. Failure to provide this link seriously undermines the policy. It is possible to operate with a licence and without planning permission because this link has not been adopted by Glasgow.

00479/28/003 Hillhead Community Council - The Plan should require enforcement on a site, not the owner, who is sometimes difficult to trace or is, frequently, outside the jurisdiction of the Scottish Courts. These should be especially used from the start when planning consent has been refused or when persistent breach of enforcement occurs.

00479/28/004 Hillhead Community Council - Adoption in the development plan of the internal measures of the Private rented sector Bill which apply to tenements, including prohibiting moving of stacked services (bathrooms and kitchens). This causes huge distress and damage to flats below. It has driven out residents of over 30 years whom we cannot afford to lose. Although this legislation applied primarily to the Private Rented Sector, tenements only function well as areas occupied by several flats, if the designed, stacked arrangement which reduce noise and damage from leaking water, are commonly observed.

00479/28/005 Hillhead Community Council - The Plan should include measures to stop the overcrowding of back court amenity space by the numerous bins required by HMOs, or dominance of this amenity area by HMOs. In part this is due to a failing to control HMOs in line with the policy, because there is no connection between planning and licensing. Suggest that the number of refuse bins be restricted or the amenity space designated for refuse storage be defined in such a way as to reflect a normal use residential use.

00479/28/006 Hillhead Community Council - Suggest that the HMO exclusion zone be extended to the other side of Byres Road to include Athol Gardens which has similar problems to Woodlands and Hillhead.

### Supporting

00479/4/001 Hillhead Community Council - Support for retention of Hillhead and Woodlands as areas where no further HMOs will be permitted. Concerns that current levels of HMOs are too high and have negative impacts on the area in terms of crime. Desire to see further measures put in place to improve this situation.

### Masterplans

### Objecting

### Western Infirmary

00474/1/001 The University of Glasgow - Objector seeks the removal of the Western Infirmary from the list of surplus NHS locations on the grounds that Policy CDP 10 seeks

to identify brownfield sites which can help to meet housing needs. In this case the site is owned by the University and a Campus Development Framework is being prepared which does not envisage housing as a major component (although an element of housing has not been ruled out).

00592/2/001 NHS Greater Glasgow and Clyde - The Royal Hospital for Sick Children Yorkhill (RHSC) & Queen Mothers Hospital is identified in the Proposed Plan as a masterplan site. The subject site is considered to be suitable for residential and student accommodation and should be designated for these uses.

The RHSC and Queen Mothers Hospital is earmarked for closure around 2015. The hospital will therefore be surplus to requirements and is considered to be suitable for redevelopment.

In accordance with policy CDP 2: Sustainable Spatial Strategy the site is within a sustainable, accessible and vibrant location and it is considered to be appropriate for a number of uses including residential and student accommodation. It can also accommodate high density development. The Council's support for new proposals that utilise brownfield sites in preference to greenfield sites is welcomed.

The site can be easily accessed and can accommodate a higher residential density. Policy CDP 10: Meeting Housing Needs states that the Council will also advise on the preparation of masterplans, within the wider context of identified spatial frameworks where appropriate, with a view to shaping the future development of brownfield sites within the following surplus NHS locations. The subject site is included within this list.

The area identified for student accommodation on the indicative masterplan (attached to original representation) as something which can be developed in the short-term.

#### Victoria Infirmary

00592/3/001 NHS Greater Glasgow and Clyde - The Proposed Plan identifies the Victoria Infirmary as a masterplan site. The new Ambulatory Care Hospital will replace all services at the existing hospital by 2015. The hospital building will therefore be surplus to requirements and is considered to be suitable for redevelopment. The administration block is Category B listed.

A masterplan has been prepared which demonstrates that a large proportion of the site offers good development potential. The site is readily developable and development can be phased over the short-longer term.

In accordance with policy CDP 2 the brownfield site is located within a sustainable, accessible and vibrant location and it is considered to be appropriate for a number of uses including a food store/ retail, residential and commercial leisure uses. It can also accommodate high density development. The Council's support for new proposals that utilise brownfield sites in preference to greenfield sites is welcomed.

Policy CDP 10 states that the Council will advise on the preparation of masterplans, within the wider context of identified spatial frameworks where appropriate, with a view to shaping the future development of brownfield sites within the following surplus NHS locations. The subject site is included within this list.

The redevelopment of this site is also supported by national planning policy and advice.

Supporting

Red Road/Barmulloch TRA

00443/1/001 Tron St Mary's Church [Chance to Thrive - General support for the Plan's proposal to prepare a Masterplan for the Red Road/Barmulloch Transformational Regeneration Area, based on housing-led regeneration. Some concerns raised over the lack of timescale for the preparation of the masterplan, the tightly defined boundary of Proposal H124, which does not take into account the wider context, and the potentially negative impact of retaining the former rail formation which skirts the north of the site, with no indication of when, or if, it will be brought back into use.

General Comment

Objecting

Glasgow Harbour

00604/2/001 Dandara Ltd - For the avoidance of doubt, the land at Glasgow Harbour referenced in this representation should be included within the zoning of Consented or Subject to Legal Agreement - Housing Sites 50 Units. Detailed planning permission is in place for residential development on land at Glasgow Harbour, under planning reference 08/02456/DC. The final phase of this planning permission is yet to be developed. Dandara are working closely with Glasgow City Council in progressing a revised proposal for this final phase at Glasgow Harbour, and are hopeful of having an up to date planning approval in place prior to the adoption of the City Development Plan. Nevertheless, there is an extant planning permission in place for the site, and this should be reflected in the Plan.

Supporting

00818/3/003 Scottish Property Federation - Support the Plan's limited expansion into effective 'green belt' areas for the purposes of effective residential development.

**Modifications sought by those submitting representations:**

Meeting Housing Needs Policy Wording

00453/14/001 - Policy CDP10 of the City Development Plan should include a clear table of housing need that can be fulfilled by existing planning permission for brownfield and green field sites. It should be explicitly stated that greenfield sites should only be considered when the brownfield opportunities have been exhausted.

00576/1/001 Gladman Developments Ltd - Amend the wording of bullet point 2 in Policy CDP 10 to read: "Maintain a five year supply of effective housing land at all times, and will support the principle of residential development on these sites. Where an audit identifies that a five year land supply is not being maintained, identify additional demonstrably deliverable and effective sites to meet the shortfall, according to the approach set out in Strategy Support Measure 10."

00621/14/001 Scottish Government – If appropriate, suitable provisions should be inserted in the Plan to address the needs of Gypsies, Travellers and Show People.

00621/14/002 Scottish Government – The policy should clarify whether the surplus NHS locations form part of the housing land supply.

00634/1/001 Dennistoun Community Council - The Plan should place increased focus on undeveloped brownfield sites in North East Glasgow and support community-led regeneration.

00664/3/001 Clyde Gateway URC - Include reference to Clyde Gateway as an area which supports housing needs and as an area where housing investment should be directed. Amend Figure 18 on Page 54 to show: the former power station site in Dalmarnock, the future phases of the Commonwealth Games Village, and the former Belvidere hospital site.

00668/1/001 McCarthy & Stone Retirement Lifestyles Ltd - An additional policy should be introduced to specifically deal with the housing needs of older people in Glasgow.

00602/3/003 Homes for Scotland - Replace the proposal to delete undeveloped release sites after one year following consent with a provision that they are deleted after five years of inactivity following adoption of the Plan.

00627/3/001 Barrett Homes West Scotland - The policy wording relating to development commencing within one year of planning permission being granted should be deleted and replaced with a note to the effect that an early start to the development will be encouraged where practicable.

00574/12/001 Scottish Natural Heritage - To ensure that development briefs and/or masterplans are developed for these sites we recommend that the following wording or similar is inserted into the relevant part(s) of Policy CDP 10 Meeting Housing needs "The Council recognises that the green belt housing release sites are located in sensitive locations and therefore we will produce a design brief and/or masterplan for each site which will provide details of the key strategic requirements that developers of the site will be required to meet".

00631/3/001 Christ's Hospital Foundation - Amend Policy CDP10 to make explicit reference to the re-use of appropriate brownfield and underutilised Economic Development Area sites as potential future locations for residential development should they continue to underperform.

00633/17/001 Strathclyde Partnership For Transport – Page 53 Context

Suggested change: Add Access, Transport Assessments and Public Transport and Parking as relevant supplementary guidance for this policy.

Page 55 Policy

Suggested change to read: "undertake a feasibility study to examine environmental, hydrological and infrastructure, including transportation issues in the larger area shown within the Green Belt to the north of Summerston (see Policy and Proposals Map) and to assess the potential for additional land supply with the smaller area highlighted;"

00442/4/001 Glasgow Centre For Population Health - Policy CDP 10 should consider the increased need for housing over the next 25 years in relation to shifts in demographic trends, in particular the rising elderly population.

00806/4/001 West Dunbartonshire Council – The policy should be re-worded to reflect a focus on brownfield sites.

#### Schedule of Housing Proposals

00621/1/4/003 Scottish Government – This schedule should identify site capacities to set out the relationship between the proposals and the identified Housing Supply Target.

#### Housing Land Supply

00501/4/001 - The Plan should identify more affordable housing sites that can be realistically delivered within the life of the plan.

00627/3/002 Barrett Homes West Scotland - Table 4 should be amended to reflect additional sites being identified to meet housing requirements.

00497/14/001 Persimmon Homes - The Plan should identify additional sites to be released within sustainable and appropriate greenbelt locations in order to aspire to meeting the SDP housing supply target.

00479/17/001 Hillhead Community Council - The Plan should allocate more land for development by Housing Associations.

#### Housing Supply Target/Housing Land Requirement

00576/2/001 Gladman Developments, 00621/4/001 Scottish Government – Policy CDP 10 should be amended to include a housing supply target/housing land requirement, and should also set out whether a generous supply of effective land for housing is provided by the Plan.

00479/17/001 Hillhead Community Council – The Plan should allocate more land for development by Housing Associations.

00602/3/001 Homes for Scotland – The policy should identify release sites in marketable locations where people want to live. A land supply should be identified to meet Strategic Development Plan requirements in full, including an allowance for generosity.

#### Housing Sites Allocated in the Proposed Plan

00501/3/001 Wheatley Group - The Plan needs to prioritise investment in order to unlock stalled brownfield sites.

00628/1/001 Gartloch Developments Ltd In Administration - Additional bullet point, as follows:

In relation to requirements in the private sector for the period 2014-2025, the Council will also:

- Support, and where appropriate facilitate, development of sites for which planning

approval has been granted

On page 53 the text at the foot of the third paragraph should be continued as shown below:

"In terms of Greenfield locations, the focus will be on securing the necessary infrastructure to allow progress in the three Community Growth Areas, at Robroyston (which has Planning Permission in Principle), at Baillieston/Broomhouse/Carmyle (where construction is underway in a small part of the area), and at Gartloch/Easterhouse (where three masterplan locations have been identified and planning permission has been granted at Gartloch Farm)".

#### Housing Sites Not Allocated in the Proposed Plan

00143/3/001 Muriel Pearson - The Plan should identify for development/regeneration all vacant and derelict land identified in the Scottish Vacant and Derelict Land Survey 2012.

00406/1/001 Comstock - Site at Mid-Netherton Farm to be included as a private housing site in the Local Development Plan.

00417/1/001 Miller Homes - Site at Leverndale Hospital Site D, Crookston to be included as a housing site in the City Development Plan.

00417/3/001 Miller Homes - Site at Leverndale Hospital Site F, Crookston to be included as a housing site in the City Development Plan.

00419/1/001 Alan McArthur - Inclusion of a site at Hamilton Road, Mount Vernon for housing in conjunction with the retention and protection of a listed Dovecot building.

00579/1/001 The Possil Estate - The site bounded by Balmore Road and Hillend Road, as identified in this submission, should be included as a housing proposal in the City Development Plan.

00632/2/001 Caledonian Properties Ltd/Taylor Wimpey - Policy CPD 10 should be amended to include the site at Auchinairn Road, Robroyston with an indicative capacity of 300-500 houses.

00497/6/001), (00643/1/001, 00643/2/001 Pollok & Corrour Ltd - Designation of land at Damshot Crescent as a housing site in the Plan.

00643/3/001, 00643/4/001 Pollok & Corrour Ltd - Designation of Kennishead Farm as a housing site in the Plan.

00617/1/001 Laurieston Developments - The site at Dalsholm Road/Temple Road, as shown on the submitted title plan, should be included as a development site in The Plan.

#### Student Accommodation

00637/17/001 Dowanhill Hyndland and Kelvinside Community Council - Policy CDP10 in the City Development Plan requires a caveat that unfettered creation of purpose-built student accommodation, developer-led, must be avoided, to be instead intelligently masterplan-led.



00479/14/001 Hillhead Community Council - The Plan should not promote any further purpose built student accommodation in the west end of Glasgow.

00566/5/001 Bob Doris MSP - The Plan should include a more rigorous policy on purpose built private student accommodation.

00623/10/001 Yorkhill and Kelvingrove Community Council - Policy CDP10 should be amended to include a presumption against further student accommodation covering the Yorkhill and Kelvingrove Community Council area.

#### Hotels/Hostels/Bed and Breakfast Establishments

00479/28/001 Hillhead Community Council - Policy CDP10 should make no provision for hostels of any kind, further hotels/bed and breakfast establishment in the Hillhead area.

#### Houses in Multiple Occupation

00637/7/001 Dowanhill Hyndland and Kelvinside Community Council - Expand the HMO Exclusion Area to include: Both sides of Byres Road from Great Western Road to Highburgh Road; Ruthven Street, Roxburgh Street, Dowanside Road, Observatory Road, as far as the east side of Saltoun Street and Caledon Street; and Hyndland Road (both sides) from Highburgh Road to Novar Drive.

00637/18/001 Dowanhill Hyndland and Kelvinside Community Council - The Plan should contain a specific reference to Council policy on HMOs and should outline specific guidelines on HMO's. There should also be a specific reference within those guidelines that states that the Council's licensing department will not grant a HMO licence until it has been confirmed that the property in question had planning consent to be an HMO.

00479/28/002 Hillhead Community Council - The Plan should include a policy which officially links the planning and licensing procedures as regards HMOs.

00479/28/003 Hillhead Community Council - The Plan should require enforcement on a site, not the owner, who is sometimes difficult to trace.

00479/28/004 Hillhead Community Council - The Plan should include the internal measures of the Private rented sector Bill which apply to tenements, including prohibiting moving of stacked services (bathrooms and kitchens).

00479/28/005 Hillhead Community Council - The Plan should include measures to stop the overcrowding of back court amenity space by the numerous bins required by HMOs, or dominance of this amenity area by HMOs.

00479/28/006 Hillhead Community Council - The Plan should extend the HMO exclusion zone to the west side of Byres Road to include Athol Gardens.

#### Masterplans

00474/1/001 The University of Glasgow - The deletion of the words "Western Infirmary" from Policy CDP 10 (page 55, second column).

00592/2/001 NHS Greater Glasgow and Clyde - The Royal Hospital for Sick Children

Yorkhill (RHSC) & Queen Mothers Hospital is considered to be suitable for residential and student accommodation and should be designated for these uses.

00592/3/001 NHS Greater Glasgow and Clyde - The Victoria Infirmary is identified in the Proposed Plan as a masterplan site. The subject site is considered suitable for a food store, retail, commercial & leisure and residential. The Proposed Plan should designate the subject site for those uses.

#### General Comment

00604/2/001 Dandara Ltd - The land at Glasgow Harbour referenced in this representation to be included within the zoning of Consented or Subject to Legal Agreement - Housing Sites 50 Units in the City Development Plan.

### **Summary of responses (including reasons) by planning authority:**

#### General Context

The Council's position in relation to consideration of the SDP housing requirements is set out in full in Background Paper 10 (OC73). In summary, the Council considers that these requirements do not represent an appropriate basis for developing Housing Supply Targets and Housing Land Requirements in the Plan. The following matters are considered to be relevant in this respect:

The recognition by the Scottish Government of methodological issues in the preparation of the HNDA for the SDP (OC 24, paragraph 10.6), and the resultant modifications to the SDP in paragraphs 4.86 and 4.86, which provided authorities with flexibility in their response to the SDP indicative requirements.

The NRS 2012-base Population and Household Projections, on which the HNDA for the SDP was based, reflected higher rates of household formation between 1991 and 2001, and did not take into account the slowdown in household formation in Glasgow between 2001 and 2008 (OC20, paragraphs 8.4 to 8.10 and Table A6). This has resulted in a household projection for Glasgow which is considered to be too high. Evidence from the 2011 Census tends to support the view that household growth in the City has not been as high as projected in the NRS projection. A post 2011 Census estimate (OC10) indicates that the number of households in Glasgow grew by 210, following a rise of only 300 the previous year.

The effect of growth in the private sector in Glasgow has also been considerable, with the total number of owner-occupied houses declining since 2009, after a period of constant growth since 1991. Between 2011 and 2014, there was a fall of around 10,000 owner-occupied dwellings, while the private rented sector grew by over 13,000 dwellings (OC18, Table 1). The private sector as a whole grew only by about 3,000 houses, suggesting that demand is being absorbed in the existing stock as a consequence of the fall in new house building.

#### Meeting Housing Needs Policy Wording

#### Objecting

00453/14/001 - Table 4 of Policy CPD 10 sets out the position in relation to the potential

land supply that is deliverable between 2009 and 2025, and indicates that there is a considerable shortfall in relation to the SDP requirement. The Council considers that the SDP housing requirement does not represent a sound basis on which to plan for housing in Glasgow, but accepts the need to ensure that there is a sufficient land supply to accommodate housing demand in the City.

Although there is a large supply of brownfield land in Glasgow, not all of it is considered to be effective, i.e. Capable of being developed in the relevant period. In effect, therefore, the effective brownfield supply has been exhausted. In these circumstances, SPP requires additional effective land to be identified. Policy CDP 10 identifies three additions to the land supply, and proposes a feasibility study to examine the potential for development in the Summerston area. Taking account of the proposed additions, the potential supply from all sources is still significantly below the requirement set out in the SDP.

In terms of the sites assessed in the SEA (CE9), the areas of two of the sites identified as additions to the land supply are smaller. In the case of Carmunnock, the area of the site identified as Proposal H114 is 2.92 ha. The reduced site area reflects the Council's response to concerns expressed on landscape impact. In relation to the Auchinairn Road site, the area of the site identified as Proposal H111 is 4.71 ha. Proposal H111 overlaps with the SEA site, but is effectively a different site which was considered to be supported in principle through the approval of the masterplan for the Robroyston/Millerston Community Growth Area. In the case of Proposal H112, the Darnley site, the site area is correct. However, it is understood that ground conditions may limit the extent of the developable area, as well as the desire to accommodate additional parking for the Dams to Darnley Country Park.

No modifications recommended.

00576/1/001 Gladman Developments Ltd - The inclusion of text limiting the consideration of whether an effective supply is being maintained to supply issues is intended to address circumstances where the owner-occupied market is experiencing weaker demand, as is the case at present. Where a site is considered to be effective in terms of the criteria set out in PAN 2/2010 (CE5), and the only impediment to development is lack of demand, the Council considers that this would not constitute a valid reason to assess the site as non-effective, with the effect that an alternative site may have to be found.

Reference is made to letter from the then Chief Planner on 29 October 2010, (OC80) which states "Where a planning authority has a 5 year supply of effective housing land but the impediment to developing that site is the general availability of mortgages or low level of demand from purchasers then there will be little if anything to be gained by releasing additional sites."

Responses from Homes for Scotland to annual housing land audits indicate that the conditions referred to in the Chief Planner's letter continue to apply to a degree. The response to the 2014 Housing Land Audit (OC79) indicates that "There has been some improvement in market conditions in the last 12 months. Demand remains constrained by mortgage availability, although Help to Buy has been a significant stimulus and some, though not all, major banks claim that they are making more mortgage availability."

Evidence of the impact of more difficult lending conditions on the owner-occupied market is also found in the growth of the private rented sector, where, despite a considerable

increase in private renting, this has not led to an equivalent amount of new build housing. Should there be improved demand in the market, it is anticipated that the sites that are currently non-effective will become effective and contribute to the City's housing supply.

In the light of these considerations, it is the Council's view that the Plan's long-term strategy would be undermined by the release of sites in a period of weaker demand. The annual audit should continue to be the appropriate mechanism through which the effectiveness of sites should be assessed. This assessment should be limited to the tests set out in PAN 2/2010 (CE5), which address matters relating to the supply. Issues relating to demand should not be factors in determining whether replacement sites would be required.

No modifications recommended.

00621/14/001 Scottish Government – The SDP HNDA (OC103, pages 138-144) concluded that there was no requirement to make specific provision for Gypsies, Travellers and Show People. The CDP has therefore not made reference to this issue. This issue will be re-examined in HNDA2, and, depending on the outcome of that process, the Council will consider whether an appropriate policy response is required.

No modifications recommended.

00621/14/002 Scottish Government – The Reporter could, if so minded, amend the Plan to include the following text to the note below the list of surplus NHS locations "The capacity from these sites has been included in the 2013 Urban Capacity Study. This does not imply ..."

00634/1/001 Dennistoun Community Council - Policy CDP2 - Sustainable Spatial Strategy expresses a clear preference for the development of brownfield sites, and for the remediation and re-use of vacant and derelict land.

The distribution of the land supply across the City is influenced by local housing markets. For the private sector, this means a consideration of whether there is sufficient demand for owner-occupied housing, while in the affordable sector, development is largely driven by the availability of resources from the Scottish Government, as well as from Glasgow Housing Association and local Housing Associations. The Council also plays a role in this (through City Property), by using its land and property assets to encourage housing led regeneration.

The City Development Plan is intended to be a starting point for engagement with communities. The forthcoming Inner East Strategic Development Framework, which is shown in Policy CDP 2, provides an opportunity to consider a number of issues, including building on the legacy of the Commonwealth Games.

No modifications recommended.

00664/3/001 Clyde Gateway URC - Clyde Gateway is identified as one of the City's strategic priorities in Policy CDP 2: Sustainable Spatial Strategy, which reflects its City-wide regeneration importance in delivering new development of different types, including new housing. This reference is considered to be an appropriate way of acknowledging Clyde Gateway's role, rather than in individual policies.

The housing opportunities identified in the CDP are taken from the 2012 Housing Land Supply. The former power station site in Dalmarnock was added to the land supply in 2014, and therefore could not be reflected in the Plan. It is now shown in the updated Action Programme. Both the Commonwealth Games Village and the former Belvidere Hospital site were under construction at 2012, and were therefore no longer considered to be opportunity sites. Sites are included in the housing land supply on the basis that they have a status as a housing opportunity, either through the submission of a planning application or a Committee decision to bring forward a site for housing. Sites which are vacant would not be necessarily identified for housing without this status.

No modifications recommended.

00668/1/001 McCarthy & Stone Retirement Lifestyles Ltd – The Plan contains policies which operate at a strategic, City-wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the plan but will be incorporated within a suite of Supplementary Guidance that will accompany the plan. This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption.

It is acknowledged that the number of elderly people in Glasgow is projected to grow from 83,000 in 2012 to 124,000 in 2037 (OC20, para 2.8). The requirement for new housing in Glasgow is considered through the Housing Needs and Demand Assessment process. Although this process identifies housing requirements by tenure, it does not set out specific targets for particular age groups such as the elderly.

Glasgow's Housing Strategy (OC78) sets out the Council's approach towards making provision for this sector. Two specific actions are proposed:

1. To improve the accessibility of existing stock so that it can meet the particular needs of an older population. City Plan 2 includes Policy RES 4: Barrier Free Housing, which sets requirements for 10% of new housing development of more than 20 houses (of all tenures) to be readily adaptable.
2. Investing in projects specifically designed for particular client groups in the social housing sector.

In terms of specific private sector provision for the elderly population, this is considered essentially to be demand driven. The purpose of the CDP is to ensure that there is sufficient land supply to meet the City's housing requirements.

In view of the above, it is not considered necessary to include a specific policy relating to the housing needs of older people.

No modifications recommended.

00602/3/003 Homes for Scotland, 00627/3/001 Barrett Homes West Scotland, 00497/5/001 Persimmon Homes - Homes for Scotland questions whether all the necessary consents can be obtained to ensure a site start can realistically be achieved within one year of receiving planning permission.

It should be noted that this note was included at the suggestion of a Homes for Scotland member, and relates only to sites added to the land supply in response to the SDP requirement. The reason for its inclusion was to ensure that the site was developed in the timescale set out in the SDP, and not held back in anticipation of more favourable

market conditions.

The introduction of the Design Guide for New Residential Areas (OC34) (following consultation with Homes for Scotland) is intended to ensure that planning and road construction consents can be obtained in tandem, provided that the developer engages with the Council prior to applying. Should this approach be followed, there is no reason to suppose that all necessary consents could not be obtained within a reasonable timescale. The Council is committed to the provision of new housing, and does not consider that delays in developing sites with planning permission is in the interest of meeting the City's housing needs.

The Reporter could, if so minded, amend the note below the table on Page 55 to read: "Any planning permission relating to additional sites will contain a condition ..."

It is considered that this would provide clarity.

00574/12/001 Scottish Natural Heritage - The Proposed Plan identifies three release locations of relatively small scale, as well as the proposed feasibility study at Summerston. In the case of the release locations, it is considered that, in view of their scale, there is no requirement to prepare design briefs or masterplans.

In relation to the Summerston location, the extent of any housing opportunity is to be determined by the feasibility study, which will take account of any site constraints, landscape and natural heritage issues, and any environmental designations that could be impacted on by development. The outcome of the study will therefore set the parameters for any design solution. Any development of the site would then have to apply the design approach set out in CDP 1: the Placemaking Principle, as well as the requirements of the Council approved Residential Design Guide, which promotes a masterplan approach. In these respects, the Council's approach is considered to be consistent with SPP, and the requirement to include the wording suggested by the commentator is therefore rejected.

No modifications recommended.

00631/3/001 Christ's Hospital Foundation - Baillieston Distribution Centre is identified as an Economic Development Area on the Policy and Proposals Map, and benefits from policy protection for industrial and business uses consistent with this designation. The preferred policy approach in these areas will be considered through a City-wide review. Should the review conclude that any location should not benefit from policy protection for industrial and business use, any proposal for residential or any other use would be considered on its merit. In view of this, it is considered unnecessary to include in Policy CDP 10 the wording suggested in the representation.

No modifications recommended.

00633/17/001 Strathclyde Partnership for Transport - It is acknowledged that there is an overlap between the requirements of CDP 11 - Sustainable Transport and policy CDP 10 - Meeting Housing Needs in terms of development in the Community Growth Areas. The Council supports, therefore, the inclusion of Public Transport, Access and Transport Assessment in the list of Relevant Supplementary Guidance in CDP 10.

The Reporter could, if so minded, amend Policy CDP 10 to include Public Transport, Access and Transport Assessment in the list of Relevant Supplementary Guidance for

**Policy CDP 10**

00442/4/001 Glasgow Centre for Population Health - The housing requirements set out in CDP 10 are derived from a Housing Need and Demand Assessment (HNDA) which was undertaken to inform the preparation of the 2012 Strategic Development Plan. The HNDA used population and household projections to 2035 to assess the need for new housing. Although the HNDA does not identify the elderly population as a specific group in terms of housing provision, Glasgow City Council prepares regular reports on demographic change in the City. The most recent report - Recent and Projected Population and Household Change in Glasgow City in 1991-2037: Results from NRS 2012-base Population and Household Projections was approved in September 2014 (OC20). The report notes the anticipated rise in the number of elderly people in Glasgow, and the potential implications that this may have for service provision and demand for new housing.

No modifications recommended.

00806/4/001 West Dunbartonshire Council - In response to other representations, the Council has presented evidence as to why the housing requirements set out in the SDP do not represent an appropriate basis on which to plan for new housing. Nevertheless, given the need to provide flexibility within the land supply, it was considered appropriate to explore opportunities for additional housing land, and this was undertaken through a City-wide greenbelt review. The limited amount of land release that has emerged from this review is indicative of the Plan's commitment to growth that does not impact negatively on Glasgow's environment. It remains the case that a significant proportion of Glasgow's land supply is provided by brownfield sites, and that these sites have comprised over 80% of housing completions in the City over the last decade (OC11).

No modification recommended.

**Schedule of Housing Proposals****Objecting**

00621/14/003 Scottish Government – The housing land supply (updated to a 2014 position) is included within the Action Programme. This is consistent with the Housing Supply Targets set out in Tables 5 and 6 which are proposed in response to (00621/4/001) below.

No modifications recommended.

**Housing Land Supply****Objecting**

00501/4/001 Wheatley Group - The Wheatley Group's support for the broad strategy of the Plan is noted.

CPD 10 considers that the housing requirements set out in the SDP are not a sound basis on which to plan for housing in Glasgow. This is the case for all tenures, but more particularly for the affordable sector, where the requirement of 56,000 is considerably above this Council's understanding of the need for new affordable housing in the City.

Further work undertaken for the Glasgow Housing Strategy 2011-16 (OC78) indicated that, in terms of affordable housing, the requirement ranged between a small surplus of housing and a small need.

The land supply figures that are set out in CDP 10 reflect assumptions about the tenure of housing that is expected to be delivered.

For the affordable sector, this is based on information from the Council's Housing Investment team which informs the Strategic Housing Investment Plan 2011-16. The anticipated output in this sector is largely driven by the availability of resources from the Scottish Government.

In terms of the need to identify greater numbers of sites for affordable housing, the response in the Plan to the level of need is considered to be reasonable and achievable in the context of the funding available.

The TRA programme is intended to deliver mixed tenure developments across the City, and will provide new affordable housing. A key focus of the TRA's was, however, that the private sector was expected to take a leading role in delivering houses for sale. The TRA programme is an important priority for the Council's Housing Investment team, but the Council is also responsible for supporting development by community-based housing associations. Nevertheless, the TRAs are identified within the Action Programme, reflecting their importance to the City and the requirement to direct resources to implementation.

In relation to some of the larger owner-occupied sites identified in the Plan including an element of affordable housing, the Plan has no specific policy requirement in this respect as there is considered to be a good range and choice of housing at different levels of affordability. Ownership of a site is a significant factor in determining the tenure, as is the location in relation to established markets. The tenure that is provided on a site will ultimately depend on the market view of whether unsubsidised housing for sale could be supported on a site, or whether deficit funding for affordable housing would be required and is likely to be available. The Plan is guided in this respect by the information that is available on a site, and by the landowner's intentions. Should a site originally identified for owner-occupation come forward for social rented housing, or any other tenure, any housing developed on that site would count towards the all-tenure requirement.

Private rented housing has been identified as a sector where considerable growth has been experienced in the last few years, albeit largely in the second-hand market. The identification in the land supply of sites for private rented housing is difficult, as there is no requirement to identify the tenure of housing when submitting planning proposals. It has been possible to identify sites for this sector after development, through examination of Sasines data, and this information is fed into the Plan monitoring. The Council welcomes the Wheatley Group's contribution to this market, through Lowther Homes, and considers that there is a demand for further development of this sector. Ultimately, the extent to which new build housing is for private renting will be a market decision.

In summary, it is considered that, in view of the Council's assessment of need, there is no specific requirement to identify further sites for affordable housing. It is also the Council's view that the approach set out in CDP 10 is appropriate, given the availability of resources for affordable housing.



00627/3/002 Barrett Homes West Scotland, 00497/14/001 Persimmon Homes - The Main Issues Report indicated that there was no requirement to identify additional housing land to meet the SDP requirement. However, the effect of the housing market downturn on housing completions and the effective land supply meant that, as the Plan progressed to Proposed Plan stage, a considerable shortfall in the land supply was identified compared to the SDP requirement. Setting aside the issue of the appropriateness of meeting the SDP housing requirement, particularly in a period of uncertain demand, it was considered that a city-wide green belt review would provide an overall view of the options available to the Council in terms of new housing sites.

Homes for Scotland considers that the green belt review did not take into account the need to deliver on the Plan's objectives relating to housing growth, and also takes the view that sites not subject to environmental designations could be considered for release.

In relation to supporting growth, the CDP strategy supports the planned growth approach that has been followed in the Glasgow and Clyde Valley area for many years, with the application of a consistent brownfield strategy, allied to strategic releases as appropriate. This has been able to accommodate significant housing growth in Glasgow, both through the current SDP and previous Structure Plans. It is this approach that has delivered the significant regeneration benefits for the City to date, and remains a key part of housing policy.

In terms of the criteria for release of sites, the green belt review sets out a clear methodology (see Sections 5.1. to 5.6, OC46) taking into account the following issues: coalescence/protecting the separation of communities; landscape and placesetting, sustainable access, biodiversity, historic environment; flooding; and other considerations, such as key uses which would prevent development. The consideration of these issues indicates that the presence of environmental designations is only one of the matters that have to be taken into account when assessing locations for development.

The review also had to reflect on the significant scale of release that had previously been approved in the Community Growth Areas.

It was concluded that, in all but a few sites, further development would have a detrimental effect on the more sensitive parts of the City's green belt. The outcome of this process was the identification of three additional sites, at Carmunnock, Darnley and Robroyston, with a combined capacity of around 130 houses. These sites are considered to be capable of being developed by 2020, and are therefore identified in the period 2009/20. A further area at Summerston is proposed to be the subject of a feasibility study to determine, among other things, whether there would be any capacity for housing.

In terms of existing greenfield supply, the progress that is now being made in the Community Growth Areas (CGA) indicates that, should there be increased demand, there is a significant amount of capacity that could come forward more quickly. For example, housing is on site at Baillieston/Broomhouse/Carmyle, with a number of phases having full planning permission. Phase 1 of 405 houses at Robroyston/Millerston has full planning permission. In the remaining CGA, it is acknowledged that the environmental, hydrological and infrastructural issues at Gartloch/Easterhouse need to be considered, and it is proposed therefore that a feasibility study would be necessary. Nevertheless, City Plan 2 identified an indicative capacity of 1,300 houses in this location. The table below shows the programmed capacity for the two CGAs that are most advanced, and an indicative capacity\* in the Gartloch/Easterhouse area.

Table 5: Community Growth Areas

	Total Capacity	Capacity 2014-21	Capacity Post 2021
Robroyston/Millerston	1,600	400	1,200
Baillieston/Broomhouse/Carmyle	1,481	849	632
Gartloch/Easterhouse	1,300*	0	1,300*
Total	4,381	1,249	3,132

It is considered, therefore, that the existing CGAs, two of which have made significant progress through to planning permission, provide an additional element of generosity in the City's land supply. It would seem to be contradictory to identify additional greenfield sites when there is a significant amount of capacity on effective or established sites yet to be developed.

In relation to brownfield supply, Homes for Scotland considers that the Council relies on the established supply becoming effective, and that progress in regeneration areas has stalled. In response, it suggests that sites in marketable locations should be released.

The Council would note that a site start had been made in Drumchapel New Neighbourhood prior to the market downturn, and that, given that there are no unknown site constraints that would prevent development, more favourable market conditions could lead to a resumption in house building.

The Ruchill/Keppoch New Neighbourhood proposal has been included in City Deal, with the prospect of infrastructure funding likely to unlock major sites in this area. Both Garthamlock and Oatlands New Neighbourhoods are on site, and continue to make progress according to demand.

In relation to Homes for Scotland's issue regarding the potential for a failure rate among Residential Potential sites, analysis of past completions indicates that sites which do not come forward tend to be replaced by other windfall sites. For example, an assessment was undertaken of the 2003-10 land supply (OC16), which covers both the peak period in house building and part of the subsequent downturn. This indicates that, for this period, owner-occupied completions were around 74% of the original programming. When the contribution from windfall sites was added, completions represented around 88% of the original programming. The shortfall in the owner-occupied sector was, however, more than made up in the private rented and social rented sectors, where there were substantial surpluses compared to the original programming. This contributed to an all-tenure surplus of almost 1,000 houses compared to the initial programming for 2003-10.

Homes for Scotland also notes that 38% of effective sites have no known builder or developer. These sites have been accepted by Homes for Scotland in the most recent audit. Circular 2/2010 (CE5) notes in section 55:

"To assess a site or a portion of a site as being effective, it must be demonstrated that within the five-year period beyond the date of the audit the site can be developed for housing (i.e. residential units can be completed and available for occupation), and will be free of constraints on the following basis:

There is therefore no requirement for a site to be in the hands of a builder or developer at the date of the audit.

In terms of making sites available to developers, the City Council, through its arms-length company, City Property, is aiming to contribute to the range of sites that are available through a marketing programme for the period 2014/15 to 2016/17. Indications from City Property are that interest in marketed sites has improved over the last 18 months, with a range of bids attracted on a number of sites.

Homes for Scotland notes that the flatted market has been particularly affected by the downturn, and that Glasgow's land supply is reliant on flatted sites. It is suggested that re-consideration of the type of housing on these sites could make development more viable and marketable.

The Council would note that sites are identified for flats in the land supply based on proposals from developers or because they are located in areas characterised by a higher density urban form. City Plan 2 policy on density has a considerable amount of flexibility in relation to density, and the Council is always open to further discussion on housing mix, within the parameters set by the desire to create places that are appropriate to their urban context. It should be noted that 73% of dwellings in Glasgow are flats, compared to 38% in Scotland (OC10, final paragraph).

It is generally agreed that the flatted market in Glasgow and elsewhere has been particularly affected by more difficult lending conditions, both for developers (who would need borrow sufficiently to complete the development) and purchasers (who are mainly first time buyers (FTB) and require significant deposits). The Scottish Housing Market Review Q4 2014 (OC21) indicates that the average deposit for FTB is around £20,000, or the equivalent of 60% of average annual FTB income. Nevertheless, the same review indicates that mortgages to FTBs have increased over the last two years in Scotland, although no figures are available for Glasgow.

Flats have traditionally made up between 70% and 80% of private sector completions in Glasgow. This has been in decline since 2010, with flats comprising only 58% of completions in the last two years. This has had an effect on the programming of the land supply, with flats and houses more or less in balance in the 2013 effective land supply. In the non-effective part of the land supply, around 68% of the capacity is flatted.

In response to Homes for Scotland's suggestion that the housing mix on sites could be altered, it is not clear how different, more expensive, house types would assist affordability, at a time when mortgage availability and the size of deposits required are key constraints in the market.

Homes for Scotland considers that progress in Community Growth Areas has been hampered by the Council's processes, rather than lack of demand.

It is important to note that each of these proposals have capacities of more than 1500 houses, which present significant challenges in resolving complex issues, often requiring consultation with a number of parties. Due to the complex nature of the discussions relating to infrastructure, drainage, community benefits and other matters, longer lead in times would inevitably be expected. In relation to the community benefits that the Council was seeking in these locations, there was a requirement for a legal agreement to be concluded, which could be time consuming.

In its response to Glasgow's 2014 Housing Land Audit, Homes for Scotland noted that demand remained constrained by mortgage availability, and that development finance

continued to be expensive. The Help to Buy scheme from the Scottish Government has assisted the market to some extent, with 4,183 house sales across Scotland assisted through this scheme from September 2013 to the end of December 2014 at a cost of £165,925,000, or an average of almost £40,000 per house (OC17). For Glasgow, 307 house sales were assisted in this period, at a cost of £10,265,000. This equates to an average subsidy of £33,400 per house, reflecting the effect of lower average prices in Glasgow. Funding of £130m for Scotland is available from this scheme for the financial year 2015/16, which would be sufficient to support around 3,250 houses at the average subsidy to date.

Help to Buy has helped to stimulate activity in new build housing, but it can only subsidise a relatively small part of the market in Scotland, and would be unlikely to support a return to the completion levels required to meet the SDP requirements.

In view of the complex nature of the large scale proposals that have been received, and the lending environment that has affected how quickly sites could be progressed, the assertion that delays in development can be attributed to the Council's processes is rejected.

In conclusion, the preference for brownfield development remains a fundamental part of the CDP strategy. The Council continues to work with the housebuilding industry to take forward opportunities for new housing, with City Property continuing to market land and buildings in a challenging market. The progress that is being made in Community Growth Areas after a period of inactivity, allied to the expectation that windfall sites will continue to contribute to Glasgow's supply of land for housing, suggest that the prospects for land supply are more encouraging. The limited land release that is proposed through the comprehensive City-wide greenbelt review is considered to provide a degree of flexibility in the choice of location for new housing, and contribute to an effective land supply that is appropriate to market conditions. In these circumstances, the addition of other sites, or wide scale release of greenbelt land, would be counter-productive to the CDP's overall objective.

No modification recommended.

00479/17/001 Hillhead Community Council - The Housing sites within the CDP have been identified for having potential for either private or affordable housing. Private sector development is influenced largely by the ability of the local market to support housing for sale, while The extent to which affordable housing can be provided is determined mainly by the availability of public sector funding. The Council's proposals for the affordable sector are set out in Glasgow's Housing Strategy (OC78).

No modifications recommended.

#### Housing Supply Target/Housing Land Requirement

##### Objecting

00497/5/001 Persimmon Homes, 00602/3/001 Homes for Scotland - Policy CDP 10 identified a housing supply of 17,638 from 2009-2020. This figure is incorrect, and should read 18,639 houses. It is based on completions from 2009-2012, and the 2012 Housing Land Supply. A comparison with the SDP requirement indicated that there was an initial shortfall of 6,761 houses.

The 2014 Housing Land Supply has been agreed with Homes for Scotland, according to the effectiveness criteria set out in PAN 2/2010. In the interests of clarity, the Council is now able to update the housing supply position to a 2014 base against the SDP requirement. This is set out below.

Table 1: Housing Supply (2014 base)

	2009/20	2020/25	2009/25
SDP Target	25,400	10,000	35,400
Completions 2009/14	4,938		4,938
Land Supply 2014/20	10,013		10,013
Land Supply 2020/25		10,259	10,259
Additions to Land Supply	130	0	130
Total Potential Supply	15,081	10,259	25,340
Shortfall/Surplus	-10,319	+259	-10,060

It is accepted that Policy CDP 10 does not provide sufficient clarity in relation to the Housing Supply Target and the Housing Land Requirement. It is therefore proposed that the Policy be amended as shown in the response below (00621/4/001 Scottish Government).

As the 2014 Housing Land Audit represents the position jointly agreed by the Council and Homes for Scotland, the programming from 2014-20 (combined with actual completions between 2009 and 2014 and the additions to the land supply proposed through CPD 10) has been adopted as the revised Housing Supply Target for 2020 (see Table 5 in the revised Policy). This is considered to be an appropriate approach, taking into account the changes to the effectiveness and deliverability of sites in the current market conditions.

This is evidenced by Homes for Scotland's comments on the 2014 Housing Land Audit (OC79), as follows:

"There has been some improvement in market conditions in the last 12 months. Demand remains constrained by mortgage availability, although Help to Buy has been a significant stimulus and some, though not all, major Banks claim that they are making more mortgage finance available. However, the gap in Help to Buy funding in 2014 is not helpful. Development finance to fund building is becoming more available, but it is expensive and reliant on robust evidence of viability. The broader economy is showing signs of growth, though inevitably the pattern of growth is uneven. In that context, the programming in Housing Land Audits should continue to be cautious."

In terms of the requirement to provide an allowance for generosity, the trend in private sector completions since 2008 was considerably below that achieved in the preceding period and, while it is not anticipated that these levels will continue, they do give an indication of the potential generosity in the supply should demand improve. For example, completions have averaged fewer than 1,000 per year over the last five years. If that trend were to continue, a land supply of 7,000 houses would be the minimum required to meet demand. The 2014 land supply agreed with Homes for Scotland provides sufficient land for 12,114 houses (OC25). This is equivalent to a generosity allowance of over 73% compared to current completion levels.

The longer term (1980-2014) trend in private sector completions is around 1,680 houses per year (OC19), which would translate to a seven year land supply of around 11,750

houses (or slightly less than the 2014 effective supply). It should be remembered, however, that the longer term trend includes an unprecedented period of activity between 2005/06 and 2007/08, when completions averaged over 3,000 houses per year, or almost double the long term average for the City.

The additions to the land supply identified in the Policy, added to the proposed feasibility study at Summerston, the masterplan areas at Easterhouse, and surplus NHS locations, are considered to provide an additional element of flexibility in the City's land supply. Glasgow's historical reliance on brownfield sites demonstrates that these sites tend to come forward according to demand. For example, brownfield sites have consistently provided in excess of 80% of private sector completions in Glasgow (OC11), regardless of whether completions have been at a high level or not. When the undeveloped supply from the Community Growth Areas is factored in, the Council considers that a generous land supply is provided.

In conclusion, the CDP position is that the SDP's housing requirements do not provide an appropriate basis on which to assess the Housing Supply Target, and therefore the Housing Land Requirement. Generosity in the land supply is considered to be provided in terms of brownfield and greenfield sites in the established supply which have the potential to become effective in an improved market. The addition of a percentage to the land supply is not considered to be consistent with the Plan's objectives for the City to grow sustainably, and is unlikely to represent an achievable target in the current market.

No modifications recommended.

00576/2/001 Gladman Developments, 00621/4/001 Scottish Government - Policy CPD 10 and Background Paper 10 consider that the SDP All-Tenure Housing Requirements do not represent an appropriate basis on which to plan for housing in Glasgow, and sets out the Council's reasoning for setting a revised Housing Supply Target and Housing Land Requirement.

The housing supply that has been identified has been updated to a 2014 position (see Table 1 above).

In the private sector, the land supply is proposed to be supplemented by additions at Carmunnock, Darnley and Robroyston, which have emerged from a City-wide review of the green belt. A feasibility study at Summerston will determine whether there is any further housing capacity to supplement the additions already proposed. It is accepted that the identified land supply does not provide a margin of generosity when compared with the All-Tenure Requirements set out in the Strategic Development Plan. The Housing Supply Target is, however, significantly above current activity, is comparable with the long term trend for the City, and is realistic in the circumstances. The potential capacity that is available in Community Growth Areas, from windfall sites and from masterplan areas is considered to provide a significant amount of flexibility in the land supply should demand improve compared to the current market.

In the affordable sector, the Housing Supply Target is informed by the availability of resources, and a recognition that, in addition to the new build housing proposed, there are a number of mechanisms being applied to address housing need in this sector.

It is accepted that the Policy could provide more clarity in regard to the generosity of the land supply, updated Housing Supply Targets and Housing Land Requirements. It is

proposed that Policy CDP 10 be amended to include appropriate text and tables to this effect.

The Reporter could, if so minded, amend the Plan to:

1. Replace Table 4: Addressing All Tenure Requirements with a new table as follows:

Table 4: SDP Indicative Housing Requirements

	2008/09-2020	2020-2025	2008/09-2025
Private Sector	25,400	10,000	35,400
Affordable Sector	46,100	9,900	56,000

2. After the sentence on Page 53 “More Detail on the Council’s reasoning behind this approach is set out in the Policy Background Paper, insert a new table as follows:

Table 5: Private Sector Housing Supply Target – 2014 Position

	2009-2020	2020-2025	2009-2025
SDP Indicative Requirement	25,400	10,000	35,400
Housing Supply (Completions 2009-2014 + Land Supply 2014-2025)	14,951	10,259	25,210
Additions to Supply (indicative capacity)	130*	0*	130*
Housing Supply Target/Housing Land Requirement	15,081	10,259	25,340

3. After the sentence on Page 54 “... and is in the process of being replaced by new mixed tenure housing”, insert the following:

The Council’s response in terms of new build provision is summarised in Table 6 below.

Table 6: Affordable Sector Housing Supply Target – 2014 Position

	2008-2020	2020-2025	2008-2025
SDP Indicative Requirement	46,100	9,900	56,000
Housing Supply Target (Completions 2008-2014 + Land Supply 2014-2025)	12,278	2,469	14,747

In terms of the Scottish Planning Policy requirement to provide a generous land supply for each housing market area, the Council considers that the SDP indicative housing requirements do not represent an appropriate basis on which to plan for housing in Glasgow. It is considered, however, that an element of generosity to the land supply can be provided through windfall sites, which have traditionally made a significant contribution to house building in Glasgow. When this is combined with the remaining capacity in the Community Growth Areas, a considerable element of flexibility in the potential land supply

is considered to be available.

### Housing Sites Allocated in the Proposed Plan

#### Objecting

00501/3/001 Wheatley Group - The proposed additions to the housing land supply are relatively small, and are considered to be developable within the capacity of existing infrastructure. The largest area of potential new housing is at Summerston, where the proposed feasibility study is intended to assess the capacity for new housing, taking account of various issues, including, the need for any investment in new infrastructure that would be required to facilitate the development.

In terms of the proximity of release sites to undeveloped brownfield land, the Council remains committed to a housing strategy that relies predominantly on brownfield sites. The requirement to identify additional sites stems from the assessment that some of the existing land supply is not considered to be effective in the plan period. The proposed sites emerged from a City-wide green belt review.

No modifications recommended.

#### Gartloch Farm

00628/1/001 Gartloch Developments Ltd In Administration - In relation to the site for 300 houses at Gartloch Farm, it is identified on the Policy and Proposals Map by the key "Consented or Subject to Legal Agreement Housing Sites > 50 units". This annotation is considered to give sufficient certainty that development of the site (subject to meeting the terms of the Section 75 legal agreement) is consistent with the City Development Plan. The site is also included in the housing land supply. Given the number of sites in Glasgow's land supply, it is not considered necessary to note in the policy text that specific consented sites are supported. The policy does note however, on page 55, second bullet point, that, "The Council will maintain a five year supply of effective housing land at all times, and will support the principle of residential development on these sites."

No modifications recommended.

### Housing Sites Not Allocated in the Plan

#### Objecting

00143/1/001 Muriel Pearson - Policy CDP2 of the Plan states that the Council will support new development proposals that will utilise brownfield sites in preference to greenfield sites; and prioritise the remediation and reuse of vacant and derelict land. In addition, DP 1 indicates that new development should help bring vacant and derelict land back into effective use via both short term (e.g. Stalled Spaces) and long term solutions. This approach is considered to be in line with both Scottish Planning Policy and the Strategic Development Plan.

Nevertheless, there will be instances where vacant and derelict land can be justifiably used for purposes other than development, including for integrated green infrastructure or for biodiversity. In addition, vacant and derelict land is being developed, and new areas of vacant and derelict land are being created, on a continual basis. The SVDLS is also



updated on a yearly basis. Given this ongoing change, it is considered that identifying all vacant and derelict land in the Plan for regeneration could only be for illustrative purposes, at a single point in time. It is considered that the commitments in CDP1 and CDP2 are sufficient.

No modifications recommended.

#### Mid Netherton Farm

00406/1/001 Comstock - The site which is the subject of this representation was identified as Zone 3.5 in the City-wide Green Belt Review (OC46). The relevant section of the review can be found at paragraph S3.3.

In summary, the review noted that the site is covered by a Site of Special Landscape Importance designation, and is very visually prominent from the Carmunnock bypass, a key approach to Glasgow.

The site also has the potential to create a precedent for development outwith the urban area, and could lead to coalescence between the Glasgow City Council area and the South Lanarkshire Council area.

In view of these conclusions, it is considered that the site should remain as green belt.

No modifications recommended.

#### Leverndale Hospital – Site D

00417/1/001 Miller Homes - The site which is the subject of this representation was identified as Zone 2.2 in the City-wide Green Belt Review (OC46). The relevant section of the review can be found at paragraph S2.4.

In summary, the review considered that this site provides an important landscape function and setting for the existing housing area to the east. This is recognised by the designation of the entire area as a Site of Special Landscape Importance. The site is covered by a Tree Preservation Order. It also functions as an attractive greenspace for the residents, and the north and west of this area functions as flood plain. SEPA data identifies it as having a high risk of fluvial flooding.

The review recommends that this site be retained as green belt, with the edge of the urban area forming a strengthened inner green belt boundary.

The site that was assessed in the SEA (CE9) was that submitted in response to the Main Issues Report, and subsequently consulted upon in the Potential Additional Sites Consultation in October 2012.

No modifications recommended.

#### Leverndale Hospital – Site F

00417/3/001 Miller Homes - The site which is the subject of this representation was identified as Zone 2.23 in the City-wide Green Belt Review (OC46). The relevant section of the review can be found at paragraph S2.5.

In summary, the review notes the presence of a series of connecting woodlands, which are designated as Ancient, Long-established or Semi-natural woodlands. Comments from SNH note that the Bull Wood and Blacksley Wood, which are within the site are both in the highest value category of the Ancient Woodland Inventory. SNH also notes that the woods are also part of larger habitat areas that are designated City-wide Sites of Importance for Nature Conservation.

SNH's comments note that the areas which are not covered by these designations, and therefore capable of accommodating development, also perform important green belt functions, in terms of providing separation from Renfrewshire Council area, providing access to recreation and wildlife connectivity and are of additional ecological value.

The area is also used for informal recreation, such as walking, and there is a desire to formalise the desire line paths in this area.

In view of the strength of comment provided by SNH, the landscape setting that the site provides for recent housing, the potential for coalescence with Renfrewshire Council area, and the important environmental designations noted above, the review concluded that the site should remain as green belt, and that the green belt boundary should be formed by the line of the Crookston Spine/ Bus Link Road, which is to be constructed to serve the green belt release site to the south.

The site that was assessed in the SEA (CE9) was that submitted in response to the Main Issues Report, and subsequently consulted upon in the Potential Additional Sites Consultation in October 2012.

No modifications recommended.

#### Hamilton Road, Mount Vernon

00419/1/001 Alan McArthur - The site which is the subject of this representation was identified within Zone 4.6 in the City-wide Green Belt Review (OC46). The site is not affected by other environmental designations. The relevant section of the review relating to this site can be found at paragraph S4.9.

The review concluded that the release of the surrounding area for housing development in the Baillieston/Broomhouse/Carmyle Community Growth Area to the east of the site, and the presence of the Paterson's landfill site (which is within the green belt) to the south, would have the effect of isolating Zone 4.6 from the green belt. It was considered that Hamilton Road would provide a stronger green belt boundary than the former rail formation, and that therefore Zone 4.6 should be removed from the green belt.

In view of the presence of existing buildings on the site, including the A listed Daldowie Dovecot, the review recommended that the potential for development should be investigated.

The site is also identified on the PAN 65 Open Space Map as a Green Corridor. In view of the site's status as protected open space, any development proposal would have to comply with appropriate policy and supplementary guidance. It is not proposed, therefore, to identify the site as a housing opportunity at this stage.

No modifications recommended.

Balmore Road/Hillend Road

00579/1/001 The Possil Estate - The site is identified on the PAN 65 Open Space Map as Other Functional Greenspace - Allotments, reflecting its current use. It was deleted from the Housing Land Supply in 2000 due to lack of progress for housing development. Should an application be submitted for the site, the proposal would have to take account of its status as protected open space, in compliance with Policy CDP 6: Green Belt and Green Network, and associated Supplementary Guidance. The site could then be considered for inclusion in the Housing Land Supply. In order to reflect the site's open space protection, it would not be appropriate to identify the site as a housing opportunity in the Plan at this stage.

No modifications recommended.

Auchinairn Road, Robroyston

00632/2/001 Caledonian Properties Ltd/Taylor Wimpey - In relation to the Robroyston site, the relevant extract of the Green Belt Review can be found at paragraphs S6.8 to S6.11 (OC46).

In summary, the review concluded that the principle of releasing a small site to the north and east of the Wester Lumloch L-SINC had been accepted by the Council in approving the Community Growth Area masterplan, and that it could be developed for fewer than 50 houses without detrimental impact. This site is represented by proposal H111 on the Policy and Proposals Map.

In terms of the remainder of the site proposed, the review noted concerns from East Dunbartonshire Council and SNH relating to the potential impact of development on landscape and visual amenity. The validity of these concerns was confirmed by the Council's own site visits, and the review concluded that no further development in this area should be recommended.

No modifications recommended.

Damshot Crescent

00497/6/001, 00643/1/001, 00643/2/001 Pollok & Corrour Ltd - In relation to the Damshot Crescent site, the Reporter on the City Plan 2 Public Local Inquiry recommended that the status of the site be reviewed as part of the Parkhouse/Deaconsbank Comprehensive Planning Study. This study has now been superseded by the Green Belt Review (OC46), the relevant extract of which can be found at paragraphs S2.9 to S2.11.

Green Belt Review - The review noted that, although the site had been separated from the Pollok Estate by the construction of the M77 motorway, it retained its Historic Garden and Designed Landscape designations. SNH notes that "the site's mosaic of woodland and grassland gives it additional Green Network value (it is designated a Site of Special Landscape Importance), and that it augments, ecologically, the wildlife corridors of both the M77 to the east and the White Cart Water to the north".

In view of the review's conclusions, the Council rejects the suggestion that the site could be developed with appropriate mitigation.

The review also makes reference to page 5 of the SNH response to the LDP Main Issues Report Potential Additional Sites Consultation (OC81). SNH concludes that “there may be little or no capacity for development on this site.”

In view of the contribution that the site makes to the green network, the review concludes that continuing protection under Policy CDP 6: Green Belt and Green Network would be appropriate, and that limited well-designed development could be accommodated within the site.

The review also notes that “much of the northern part of the site is vulnerable to flooding.”

House Building in Sector - Pollok and Corrour notes that there is little current house building in this sector, and the site has been re-designated from green belt to greenspace.

The south west of the City has benefited from a considerable amount of house building in recent years, with two large scale green belt releases through City Plan 1, at Parkhouse (333 houses now complete) and Crookston (265 houses on site). Much of the former Leverndale Hospital has also been re-developed for housing. These and other sites have contributed to the development of over 4,000 private sector houses in the Greater Glasgow South Sub-Market Area since 2005/06 (OC13).

The 2013 Housing Land Audit indicates that there is sufficient land for around 3,250 houses between 2013 and 2020 (OC12).

No modifications recommended.

#### Kennishead Farm

00643/3/001, 00643/4/001 Pollok & Corrour Ltd - In relation to the Kennishead Farm site, the Reporter on the City Plan 2 Public Local Inquiry considered that, in view of: its topography, its designation as a Conservation Area, SINC, and Ancient, Long-established or Semi-natural Woodland, its detachment from the residential area and its contribution to the green network, the site was not suitable for housing.

Green Belt Review - The site was also considered through the City-wide Green Belt Review, the relevant extract of which is found at paragraph S2.13 (OC46). In summary, the Review reflected the conclusion of the Reporter.

Landscape - Reference is made to the page 4 of the SNH response to the LDP Main Issues Report Potential Additional Sites Consultation (OC81). SNH concludes that “development here would have significant adverse impacts.”

House Building in Sector - Pollok and Corrour notes that there is little current house building in this sector.

The south west of the City has benefited from a considerable amount of house building in recent years, with two large scale green belt releases through City Plan 1, at Parkhouse (333 houses now complete) and Crookston (265 houses on site). Much of the former Leverndale Hospital has also been re-developed for housing. These and other sites have contributed to the development of over 4,000 private sector houses in the Greater Glasgow South Sub-Market Area since 2005/06 (OC11).

The 2013 Housing Land Audit indicates that there is sufficient land for around 3,250 houses between 2013 and 2020 (OC12).

Site Effectiveness - The site is identified as green belt, and therefore does not meet the land use criteria listed in PAN 2/2010.

Disconnection from Pollok Country Park - The re-designation of the adjacent site at Cowglen followed a planning study, and is not relevant to the consideration of this site. It should also be noted that the Cowglen site is brownfield, is not in the green belt or the Pollok Estate Conservation Area, and is to the north of Kennishead Farm. The Cowglen site therefore does not separate Kennishead Farm from the rest of the Pollok estate to the east, and development at Cowglen could be accommodated with no impact on the relationship between Kennishead Farm and the rest of the Pollok Estate.

No modifications recommended.

### Temple Road

00617/1/001 Laurieston Developments - The site which is the subject of this representation was not submitted to the Council at any stage in the development of the Proposed Plan, and therefore cannot be considered for inclusion as a proposed housing development site.

No modifications recommended.

### Student Accommodation

#### Objecting

00637/17/001 Dowanhill Hyndland and Kelvinside Community Council - The Council recognises that parts of the City have housed a student population for a considerable period, mainly in the second hand private rented sector and in halls of residence. It is the Council's view that purpose-built student accommodation can play a role in meeting some of this demand in a well-managed and regulated environment, and can contribute to sustaining local areas. The proposed CDP and proposed Meeting Housing Needs Supplementary Guidance seek to ensure that new development is of sufficient quality, is integrated successfully within existing neighbourhoods and does not impact on the amenity that local communities enjoy.

For these reasons, therefore, the Council is not supportive of applying thresholds to the amount of student accommodation in particular locations or applying a caveat to planning policy stating that developer led purpose built student accommodation must be master plan led.

No modifications recommended.

00479/14/001 Hillhead Community Council, 00566/5/001 Bob Doris MSP, 00623/10/001 Yorkhill and Kelvingrove Community Council - The Council recognises that parts of the City have housed a student population for a considerable period, mainly in the second hand private rented sector and in halls of residence. It is the Council's view that purpose-built student accommodation can play a role in meeting some of this demand in a well-managed and regulated environment, and can contribute to sustaining local areas. The

proposed CDP and proposed Meeting Housing Needs Supplementary Guidance seek to ensure that new development is of sufficient quality, is integrated successfully within existing neighbourhoods and does not impact on the amenity that local communities enjoy.

For these reasons, therefore, the Council is not supportive of applying thresholds to the amount of student accommodation in particular locations.

No modifications recommended.

#### Hotels/Hostels/Bed and Breakfast Establishments

##### Objecting

00479/28/001 Hillhead Community Council - This has not been identified as a priority and the existing policy and emerging SG will help to control this.

No modifications recommended.

#### Houses in Multiple Occupation (HMO)

##### Objecting

00637/18/001 Dowanhill Hyndland and Kelvinside Community Council - The supplementary guidance covering HMO (OC62) does make specific reference to the need for licensing approval. The revised expressed relationship between guidance and CDP policy set out in Issue Number 54 means that HMO proposals are now mentioned. However it would be ultra vires if the Plan or supplementary guidance sought to state that a license would not be granted prior to planning permission be granted.

No modifications recommended.

00479/28/002 Hillhead Community Council - The Plan references multiple occupancy and the position set out in Issue 54 sets out that multiple occupancy shall be included in CDP 10 "Meeting Housing Needs". The guidance was consulted on last year and includes detailed reference to the link with licensing in respect of multiple occupancy and clearly sets out the need for more than just planning permission.

No modifications recommended.

00479/28/003 Hillhead Community Council - It is not for the Plan to set out who or what enforcement action should be directed towards as this is set out in Section 127(2) of 1997 Town and Country Planning Act.

No modifications recommended.

00479/28/004 Hillhead Community Council - The physical works involved would not appear to require planning permission in themselves and would, therefore, be difficult to enforce through a policy or supplementary guidance. Furthermore, it would appear to represent duplication of the detail in the other legislation.

No modifications recommended.

00479/28/005 Hillhead Community Council - The supplementary guidance (OC62) prepared in respect of HMO's sets out criteria for assessing proposals and takes account of the effect of clustering of HMO uses by seeking to control their prevalence.

No modifications recommended.

00479/28/006 Hillhead Community Council, 00637/7/001 Dowanhill Hyndland and Kelvinside Community Council - The extent of the HMO restrictions set out in the supplementary guidance (OC62) shows the extent of the restriction area at the moment and in the preparation of the guidance it has not been proposed to alter the restricted area. However, this representation will be considered in the review of the Supplementary Guidance to examine whether there is merit in extending the area. However as this is an item to be dealt with in the guidance it is not appropriate to alter the plan as proposed.

No modifications recommended.

#### Supporting

00479/4/001 Hillhead Community Council - Comment of support noted

No modifications recommended.

#### Masterplans

#### Objecting

#### Western Infirmary

00474/1/001 The University of Glasgow - Given the updated information provided by Glasgow University, the Council agrees that Policy CDP 10 should not make reference to the Western Infirmary.

The Reporter could, if so minded, amend Policy CDP 10, page 55, 2nd column by the deletion of the words "Western Infirmary".

00592/2/001 NHS Greater Glasgow and Clyde - This location has been identified as a masterplan area in order to facilitate discussions between the NHS and the Council as to the most appropriate mix of uses to be developed. These discussions will be informed by Scottish Planning Policy, the Govan/Partick Strategic Development Framework, and appropriate policy and supplementary guidance in the City Development Plan. Although the indicative masterplan has identified preferred uses for the site, it is considered inappropriate to identify the site for these purposes until the outcome of these discussions is known.

Once the masterplan has been agreed, it will provide a clear planning framework for the determination of planning applications for the site.

No modifications recommended.

#### Victoria Infirmary

00592/3/001 NHS Greater Glasgow and Clyde - This location has been identified as a

masterplan area in order to facilitate discussions between the NHS and the Council as to the most appropriate mix of uses to be developed. These discussions will be informed by Scottish Planning Policy, the South Central Strategic Development Framework, and appropriate policy and supplementary guidance in the City Development Plan. Although the indicative masterplan has identified preferred uses for the site, it is considered inappropriate to identify the site for these purposes until the outcome of these discussions is known.

Once the masterplan has been agreed, it will provide a clear planning framework for the determination of planning applications for the site.

No modifications recommended.

#### Supporting

00443/1/001 Tron St Mary's Church (Chance to Thrive) - Comment of support noted.

#### General Comment

#### Objecting

#### Glasgow Harbour

00604/2/001 Dandara Ltd - The proposals shown on the Policy and Proposals Map are taken from the 2012 Housing Land Supply. As the final phase of the development to which the planning permission relates has not been completed, the site is considered to be under construction. It was therefore not identified as a proposal on the Policy and Proposals Map. A new application has now been submitted for this phase, and the site continues to be regarded as a housing opportunity.

No modifications recommended.

#### Supporting

00818/3/003 Scottish Property Federation - Support noted.

No modifications recommended.

#### **Reporter's conclusions:**

#### Policy Wording

1. A number of representations sought to have a table inserted into the Proposed Plan, setting out the Housing Land Supply (HLS) and the Housing Land Requirement for the Proposed Plan, arising from the Strategic Development Plan (SDP).
2. I find that such a table would greatly assist in providing clarity in terms of what is being provided in the Proposed Plan, and in which Plan period. I am recommending that a new Table 4 be populated and inserted into Policy CDP10, and this matter is further addressed in the section of this issue headed "Housing Land Supply/Housing Land target". The Scottish Government provided an example table in response to an FIR, and I find that table is appropriate. I recommend that the Proposed Plan be modified



accordingly.

3. The representation seeks to have the majority, if not all, of the HLR for the Proposed Plan area met on brownfield sites within the City. The council advises that although its overall strategy and placemaking policy aims to maximise brownfield sites, homes cannot be located in a single type of area, i.e. brownfield and / or vacant land. Whilst the council is prioritising the latter, marketability, infrastructure issues and deliverability issues mean that other types of sites have a place in the HLS for the Proposed Plan. I find that the council has been successful in delivering homes on brownfield sites across the City, and in the last Plan period homes completed on such sites comprised some 80% of all completions. The 2013 Urban Capacity Study clearly sets out the ability to deliver homes from the land resource available in the City. I agree that sufficient land must be found to meet the adjusted SDP requirement, and that land cannot be delivered solely from brownfield sites. I conclude that the approach of the council is justified, where there is firstly a reliance on brownfield sites, then a minimal release of greenfield sites to meet an identified need. There is no modification to the Proposed Plan.

4. Representations sought to delete reference to “supply” in Policy CDP10, which limited consideration of whether or not an effective supply is being maintained to supply issues. The council responded justifying its reliance on supply issues, based on the 2010 letter from the then Chief Planner, and considers that the strategy of the Proposed Plan would be undermined by the release of sites in a period of weaker market demand. At the hearing into this issue, it was clear that housebuilders and their representative body felt that market demand in the City was being suppressed, in part, by the lack of effective sites in marketable locations.

5. I conclude that rather than solely limiting consideration to supply issues, the Proposed Plan should have regard to the test for deliverability as set out in SDP 2012 Strategy Support Measure 10 (SDP page 51). The Strategy Support Measure sets out criteria to guide the release of sites to augment the supply. The Policy will be modified to reflect the SDP.

6. A query arose regarding provision for Gypsy, Traveller and / or Show People housing need. The council has confirmed that the SDP 2012 HNDA did conclude that no Gypsy, Traveller and / or Show People sites were required in the Plan area, however this area of need will be re-examined in HNDA2 and addressed if required. Having perused the SDP 2012 HNDA, I agree with the conclusions of the council and there will be no modification to the Proposed Plan.

7. Clarification was sought to determine the status of the surplus NHS sites referred to in the body of Policy CDP10. The council has clarified that the NHS sites are not identified as effective in either the Urban Capacity Study 2013 or the Housing Land Audit 2014. Submissions in response to the Proposed Plan and in response to FIRs relating to this issue from and on behalf of the NHS have clarified that the NHS sites (with the exception of the Western Infirmary) are capable of becoming effective during the Plan period 2015-2020, and are currently the subject of various stages of masterplans and frameworks. There is no evidence before me to suggest that the NHS sites should be excluded from the housing land proposals in this Plan, notwithstanding that they were not identified as effective sites in the 2014 Housing Land Audit. I recommend that the current references to the NHS sites be deleted from Policy CDP10, as there is no justification for treating such sites in a different manner to any other brownfield site. As is set out below, the NHS sites (with the exception of the Western Infirmary which is required for university use) are

now included in the housing land calculation as effective and capable of delivering homes within the Plan periods and identified as housing sites on the Proposals Map (see paragraphs 40-44).

8. The potential and existing ability of sites within the Clyde Gateway URC area to deliver homes has been identified in a representation as not being reflected in the Proposed Plan. The council considers that Policy CDP2 Sustainable Spatial Strategy addresses the broad regeneration potential of the sites including housing capacity. I conclude that sites which have been commenced with remaining capacity and / or sites with potential for delivering housing should be identified in both the Housing Proposal Schedule (new Appendix to the Proposed Plan) and on the relevant Map. The Proposed Plan should be modified to reflect such sites in the Clyde Gateway area. A representation seeks to remove the reference to the Western Infirmary from Policy CDP10, as it will now be required for university purposes. The council supports the change to the text, and I agree that the Proposed Plan can be modified accordingly, as the submissions from The University of Glasgow support the modification and confirm the proposed use of the site. The Proposed Plan should be modified accordingly.

9. A representation seeks to have housing for elderly people set out in the Proposed Plan. The council considers that housing for elderly people is demand driven, and that such demand can be met from the overall HLS. I agree with the conclusions of the council. I find that housing for elderly people has not been separately identified in the SDP HLR but it is not a requirement of SPP that all housing types are separately addressed in development plans, and in the Proposed Plan the tenures identified are private and affordable.

10. A number of representations have queried the requirement in the Policy to commence construction on housing sites within one year of the grant of planning permission (to resolve a failure in the effective housing land supply). The ability to achieve the necessary associated construction consents within a 12 month period is questioned. The council has responded by noting that the requirement was included at the request of another representation in the Plan process, and that The Design Guide for New Residential areas (OC34) should ensure that consents are obtained in a timely manner. I conclude that there appears to be little justification for imposing a one year time limit on a planning permission, when the aim of the consent is to deliver homes to meet the five-year effective supply. Circumstances may arise over which the planning authority or the developer has little or no control, but the site may remain effective. If assessed properly during the determination process of the planning application, then the effectiveness of the site should be apparent. I recommend that the paragraph of the Policy which refers to the requirement for sites to be commenced within 1 year of permission being granted be deleted.

11. In response to a representation seeking a design-led approach to the proposed green belt release sites, I find that such an approach is actually in place, with feasibility and master plans underway which will be determining factors whether or not the sites will actually be released. SNH would be statutory consultee in any relevant planning process, and could be involved should the council require their input. It is not a matter for the Proposed Plan to specify who should be involved in any of the planning processes associated with specific sites. In relation to Summerston, the councils' approach is examined at Issue 43. I recommend no modification to Policy CDP10.

12. The re-use of Economic Development Area (EDA) sites for housing purposes is

sought in representations. The council has responded stating that it intends to carry out a city-wide review into EDA sites with the aim of identifying those that do not merit policy protection and which could be available for other uses. The proposed review is discussed elsewhere in this report at Issue 10, but in relation to Issue 17 it is not appropriate to re-designate the EDA sites for housing at this stage. However, nothing prevents appropriate sites coming forward through the development management process, where the merits of individual sites can be assessed against the criteria and policies of the Proposed Plan, and a statutory public participation exercise carried out.

13. Strathclyde Partnership for Transport (SPT) sought to have the link between Policy CDP11 Sustainable Transport and this housing policy addressed more explicitly. The council agrees that to do so is appropriate, and suggests that a reference to SG on Public Transport, Access and Transport Assessment be added to the list of relevant SG on page 54 of the Proposed Plan. I agree, and the Proposed Plan should be modified accordingly.

14. A representation seeks a timeframe of 25 years for housing provision in the Proposed Plan. The council considers that the Proposed Plan, being within an SDP area, looks to housing provision for the next 10 years, in accordance with SPP. The Proposed Plan reflects the policy requirements for timeframes, and I agree that no modification is required.

15. A number of representations have objected to the omission of a Schedule of Housing Proposals from the Proposed Plan. The council have responded by stating that the sites are set out in 2014 Housing Land Supply (OC34), and that the schedule would be too large to include. I sent an FIR to the council requesting a table with all housing sites to be identified and categorised. This has been provided and will be included as an Appendix to the Proposed Plan. The Proposed Plan will be modified accordingly.

#### Housing Supply Target/Housing Land Requirement

16. A number of representations have raised the matter of the Housing Land Requirement (HLR) not being set out clearly in the Proposed Plan. The council acknowledges that sufficient clarity is not currently provided in relation to HLR, and accepts the suggested modification of including a revised table setting out the re-calculated HLR. I agree that the HLR arising from the SDP needs to be clearly set out in the Proposed Plan. The Proposed Plan will be modified with current Table 4 being deleted from the Proposed Plan and replaced with an updated and revised table illustrating the HLS and the resulting Plan HLR. The SDP figure to be used as the adjusted Housing Supply Target is set out in the revised calculations below, and will be used in the Proposed Plan.

17. The issue of compliance and meeting the identified SDP 2012 HLR is acknowledged and has been raised by a number of respondents. From the submissions and the response of the council, the exchange of documents in the FIRs and the discussions at the oral hearing, it is clear that the calculation of the HLR for the Proposed Plan is a matter of opposing views.

18. From the above evidence base, I understand the council's position to be that the housing figures as set out in SDP Table 11 are indicative only, and can be revised as appropriate when the relevant authority's Plan is being prepared.

19. In addition, the council considers that paragraphs 4.86 and 4.86a of the SDP

specifically permit the revision of the figures in Table 11, and acknowledge the limitations of the housing land calculations carried out at the time the SDP was prepared.

20. During the examination of this plan, the 2014 Housing Land Audit was published, as was the HNDA accompanying the replacement SDP, which is at Main Issues stage. In addition, population data produced since 2009 has predicted a very different scenario for population growth and consequently housing need and demand in the Glasgow City area, with a much lower household formation rate and lower inward migration than previously anticipated in the preparation of the SDP. The council's position is that the Proposed Plan should properly reflect the most up-to-date position based on the latest available data sources.

21. During the course of this examination, and in response to an FIR relating to Issue 17, the council submitted a revised housing land calculation for the Proposed Plan, based on the HNDA which has been produced for the replacement SDP. Utilising this data as the base for the housing land calculation for the Proposed Plan gives rise to a markedly different position to that arrived at if the HNDA and 2012 SDP are used as the base data.

22. I conclude that while there is merit in using the latest data sources, and providing a realistic scenario for the delivery of homes in the city, the Proposed Plan needs to be in accordance with the approved 2012 Glasgow and Clyde Valley Strategic Development Plan (GCVSDP). The following legislation and policy requires that the Proposed Plan be consistent with the approved SDP:

- Town and Country Planning (Scotland) Act 1997 (as amended): Section 16 (6) – requirement for an LDP to be consistent with the SDP
- Scottish Planning Policy – Paragraph 119, Local Plans in city regions
- Circular 6/2013 – paragraph 56, ensure the plan is consistent with the SDP
- SDP paragraph 11

23. I have been provided with no evidence that persuades me that the emerging Clyde Valley SDP and the associated HNDA are the appropriate base for calculating this Plan's HLR, and so the HLR calculation must be based on the approved 2012 SDP.

24. HNDA 12 is based on population data from 2008 and 2009, and on housing data sets from that period. It should be acknowledged that those projections have not materialised, and that the housing market and supply of housing in the City is very different to that envisaged by both HNDA and the 2012 SDP. I find that based on the evidence from written submissions and the hearing, population growth and household formation in Glasgow has not achieved the rates anticipated, the housing market in the City has suffered a well-documented recession and overall housing completion rates have fallen from a high of 3,244 in 2007/2008 to 802 in 2012/2013.

25. HNDA 15 estimates that household growth in Glasgow will average approximately 2,700 per year until 2037. The council has argued that even this rate is in excess of any growth rate achieved in the past, and so HNDA 15 has been adjusted to reflect those rates. The outcome is that while HNDA 12 had made provision for a growth rate in households of some 91,400 in the period 2008-2025, HNDA 15 now estimates that only 44,303 households will form in the City in the period 2012-2025.

26. I find that caution should be used when applying data sets to projections, as is evidenced by the above scenario. In 2012 GCVSDP was adopted, which the constituent

planning authorities did so on the basis of the HLR set out in SDP Table 11. Hindsight is useful, but the same precaution should be used in applying the very different housing need and demand scenario envisaged by HNDA 15 and supported again by the council.

27. Representations addressed the apparent disparity between the SDP 2012 HLR and the HLR as set out in the Proposed Plan. From the parties who took part in the hearing session on Issue 17, there was support for allocating additional land which parties presumed would deliver the housing numbers as set out in the SDP, and to that end a number of additional sites had been put forward for allocation in the Proposed Plan. I conclude that although there is merit in basing the housing land calculation of the Proposed Plan on the most recent data sets, the legislative and policy context requires it to be consistent with the 2012 SDP.

28. I find that SPP is clear at paragraph 116 that a margin to ensure a generous supply of housing in a Plan period should be added to the housing land requirement. SPP sets out a margin range of between 10 and 20%. The council considers that no margin should be added on the basis that there is already an over-supply of housing land in the Proposed Plan area and that completion rates indicate that there is sufficient land to accommodate demand in the Plan period. Representations seek to add a margin to ensure a generous housing land supply.

29. I find that in accordance with SPP, a margin needs to be added to the HLR to ensure a generous supply, should allocated sites become ineffective for whatever reason. In this instance, as I have found that there is a shortfall in both housing sectors based in the adjusted SDP 2012 figures, an allowance of 10% would be appropriate. I have based the allowance level at 10%, because the rate of housing completions in Glasgow City, the record of delivery of homes through windfall development and population data has demonstrated that growth has been at a slower and lower rate than anticipated in HNDA 12. I have added a 10% margin to the HLR for the Proposed Plan, and this is reflected in the calculations below.

30. In order to provide a housing land supply which is deliverable and capable of meeting the identified need and demand in the city, the housing land calculations have been revised as set out below.

#### Housing Land Calculations

31. When taking the council FIR responses and hearing evidence into account, and accepting that the GCVSDP 2012 figures are indicative, and allowing for GCVSDP para 4.86 and 4.86a criteria, it can be established that an element of double counting was identified in the SDP.

32. I conclude that the element can be reasonably set by the quantified amount of double counting as set out at the hearing, i.e. 26,000 units. This double counting anomaly arose apparently due to differing base dates and the overlap between demand in the affordable and private rented sectors.

33. Using the GCVSDP figures as a base, I find that the calculation then needs to be revised to reflect the identifiable element of double counting. To do that, each sector and resulting total needs to be proportionately reduced, by the appropriate percentage of the double counted element. The way in which this has been calculated is set out below:

Table 1 – SDP 2012 Housing Land Requirement and %'age of double counted element

	09-20	%'age	20-25	%'age	total
Private	25,400	27.8	10,000	10.9	
Affordable	46,100	50.4	9,900	10.8	
Total	71,500		19,900		91,400

Private = 38.7% 10,062

Affordable = 61.3% 15,938

Table 2 – Resulting adjusted SDP 2012 Requirement for Glasgow from Table 1

	09-20	20-25	Total
Private	18,172	7,136	25,308
Affordable	32,996	7,092	40,088
Total	51,168	14,228	65,396

Revised SDP Requirement = 65,396 homes

Table 3 – Annual SDP 2012 Requirement for Glasgow

	09-20	20-25
	÷ 11	÷ 5
Private	1,652	1,427
Affordable	3,000	1,418
Total	4,652 per annum	2,845 per annum

Table 4 – Glasgow CDP Housing Land Requirement (+10% SPP generosity allowance)

	15-20	+10%	20-25	+10%
Private	8,260	9,086	7,136	7,850
Affordable	15,000	16,500	7,092	7,801
Total	23,260		14,228	
+10%	25,586		15,651	

Total x 10 years GCDP = 37,488 + 10% = 41,237

Table 5 – Glasgow CDP Housing Land Supply (HLS)\*

	15-20	20-25
Private	9,312	10,779
Affordable	5,197	7,579
Total	14,509	18,358

\*Housing Land Audit 2014

### Completions

34. In HLA 14, the council set out completions from 2003 to 2013. An additional FIR sought clarification on the tenure split in those completions, and based on the annualised requirement for each tenure sector, the following number of homes can be removed from the Glasgow CDP HLR, as they have already been delivered;

Table 6 – Glasgow Completions 2009-2013

	09-10	10-11	11-12	12-13
Private	1,379	1,073	955	802
Affordable	812	1,035	1,127	473
Total	2,191	2,108	2,082	1,275

35. The GCVSDP 2012 set an annualised requirement of 4,652 units for Glasgow, in all sectors per annum for 2009-2015. The total requirement for completion of homes in the period 2009-2014 would be  $4,652 \times 5 = 23,260$ .

36. Actual completions were 7,656 homes for the period 2009-2013, as set out in the HLA 14. Based on the annual average rate of completions for the previous 5 years, an estimated completion rate for 2013-2014 could be 2,047 for all sectors and only for the purposes of this calculation.

37. Private completions averaged 1,192 against an annual SDP HLR of 1,652. Affordable completions averaged 855 against an annual SDP HLR of 3,000. In the period 2009-2014, the Private sector had an SDP HLR of 8,260, completions of 4,938 and so a shortfall of 3,322 homes.

38. In the period 2009-2014, the affordable sector had an SDP HLR of 15,020 homes, completions of 4,823 and so a shortfall of 10,197 homes. Table 7 below illustrates the position in terms of homes which have been delivered in Glasgow from the SDP HLR 2009-2014, and the resulting shortfall which remains to be delivered.

Table 7 – SDP Requirement and Completions 2009-2014

	SDP Requirement 2009-2014	Glasgow City Completions 2009-2014	Surplus/Shortfall
Private	8,260	4,938	-3,322
Affordable	15,000	4,823	-10,177
Total	23,260	9,761	-13,499

### Additional Sites

39. In the various consultation exercises carried out in the preparation of the Proposed Plan, sites had been proposed by various parties as being potentially suitable for allocation as housing sites and capable of delivering homes in the Proposed Plan periods. These sites have been evaluated in this examination, and are addressed individually in the paragraphs below and later in the conclusions on this Issue. Where this examination has concluded that the sites could be considered effective and included as part of the HLS, the number of homes that can be delivered in the Plan period are set out at Table 8 and included in the final overall Glasgow Housing Land table in this report.

40. The NHS estate in Glasgow has been subject to major change in the past plan period, and consequently there are a number of sites in the city which will be available for re-development in this Plan period. Representations seek to have the sites identified for development in the 2015-2020 period.

41. These surplus NHS locations have been identified in the Urban Capacity Study 2013 and in the Environmental Report which accompanies the Proposed Plan, but are not

identified as effective sites in either the HLA 2014 or the Proposed Plan. The potential of the NHS sites has been acknowledged by the council in Policy CDP10, but not as housing allocations. They are identified as requiring masterplans and spatial frameworks, and a note within the Policy indicates that it should not be implied that residential development is acceptable in principle on all of these sites.

42. The representations rightly identify that the replacement NHS facilities are now operational in Glasgow, the surplus sites are available and indicative masterplans have been prepared for some of them, setting out potential capacity and land uses, including phasing of delivery. I can see no reason not to include the following three surplus NHS sites as housing allocations in the Proposed Plan, for delivery in the period 2015-2020. I also note that the estimate of site capacity as set out in the representations exceeds that of the UCS 2013 study, but I accept the later figures as they are based on the most recent preliminary masterplanning and phasing exercises:

- Victoria Infirmary – 500 units
- Yorkhill – 700 units
- Mansionhouse – 100 units

43. The sites at Stobhill, and Orchard Wards are assumed to deliver housing in later plan periods, post-2024.

44. The Proposed Plan should be modified by the inclusion of the above NHS surplus sites in the Schedule of Housing Sites which is proposed to be an Appendix to the Proposed Plan, and on the Policy and Proposals Map. The final bullet point of paragraph 3 of Policy CDP10 should be deleted in its entirety.

45. In addition to the surplus NHS sites, a number of unresolved representations have been made relating to sites proposed for housing development. They have been considered elsewhere in this report, and each of them has a site specific recommendation.

46. Of those sites, the following have been found to be sites which should be included as housing proposals in the Proposed Plan, and which are capable of contributing to the Effective Housing Land Supply in 2015-2020 and 2020-2025. They are sites that have not been included in the HLA 2014, and so are additional to the existing Housing Land Supply calculation.

Table 8 – Additional GCDP Housing Sites 2015 - 2025

Issue No	Site	2015-2020	2020-2025	Post 25
	Victoria Infirmary	500		
	Yorkhill	700		
	Mansionhouse	100		
42	H112 Corselet Road, Darnley	40		
43	H113 Summerston			700
44	H114 Cathkin Road, Carmunnock	50		
45	H117 North & East of Garthamlock	240	240	850
46	H118 Maryhill TRA		21	
Total		1,630	261	1,500



47. In total, the additional number of units that could be added to the Glasgow Housing Land Supply in 2015-2020 is 1,630, and in the period 2020-2025 it is 261. All of these potential homes are on privately owned sites, and so an assumption about the delivery of affordable housing is made on the basis of 25% of the total number of units, in accordance with SPP and PAN 2/2010. Such an assumption implies that of the total number of additional homes to be added to the calculation, there is a tenure split of 75% as private homes and 25% as affordable homes. This percentage split is reflected in the numbers added in to the final Glasgow Housing Land table. These numbers do not include an allowance for windfall development, which is set out below.

48. The Proposed Plan should be modified by the inclusion of the above additional housing sites in the Schedule of Housing Sites which is an Appendix to the Proposed Plan, and on the Policy and Proposals Map.

#### Windfall development

49. Since 2009, the annual average rate of completions on windfall sites in the City is approximately 305 homes. This encompasses a range from 58 homes in 2009/10, to 600 homes in 2013/14. In accordance with SPP paragraph 117, an annual allowance can be made based on previous rates of completions. In this instance, I find that an allowance of 300 homes per annum would be reasonable, based on the average completions per annum over the period 2009-2014. This allowance should then be further split between the two tenure sectors on the basis of 75% to private and 25% to affordable, 225 and 75 homes annually, in accordance with SPP and PAN 2/2010 and reflecting the assumptions made in paragraph 47 above. The resulting annual windfall allowance could then be added to the HLS for each tenure in each of the Plan periods.

Table 9 – Glasgow Windfall Allowance 2015 - 2020

	15-20
Private	1,125
Affordable	375
Total	1,500

#### Housing Land

50. The housing land supply and requirement calculations for the Proposed Plan demonstrate that the affordable element of the HLR in the Proposed Plan comprises some 64% of the total requirement in the Plan period 2015-2020. The council's Housing Investment team advise that a realistic level of delivery in Glasgow in the affordable sector would be approximately 1,000 homes per annum, based on an assessment of available resources.

51. The council suggested in its response to FIR no. 2 on this issue that the figures could be adjusted to reflect provision for the affordable sector in the private sector, but I consider that such a tenure adjustment could give rise to an element of double-counting of HLR and should not be pursued for that reason.

52. In determining the overall HLR for the Proposed Plan, I agree with the council that it is reasonable to accept that the delivery of homes in the affordable sector should be based on a realistic assessment of delivery, and on that basis the HLR for that tenure sector is very unlikely to be delivered in this or subsequent Plan periods. In accordance with SPP paragraph 128, the Proposed Plan should acknowledge that the affordable

sector HLR cannot be met in full in the Proposed Plan, for the reasons set out above. The Context section of Policy CDP10 should be amended to reflect this modification, and the proposed additional text is set out in the recommendations below.

53. In addition to the above tables, a number of representations sought the inclusion of a table which clearly sets out the overall position in the city in relation to housing land. I agree that such a table would provide clarity for users of the Proposed Plan, and conclude that the table below should be included in the Context section which precedes Policy CDP10. The Proposed Plan should be modified accordingly.

Table 10 – Glasgow 2DP Housing Land 2015-2025

	Total	Total	Private	Private	Affordable	Affordable
	2015-2020	2020-2025	2015-2020	2020-2025	2015-2020	2020-2025
SDP Housing Requirement + 10% SPP allowance	25,586	15,651	9,086	7,850	16,500	7,801
Glasgow City Development Plan - Housing Supply	14,509	18,358	9,312	10,779	5,197	7,579
SDP HLR 2009-2014 Shortfall	-13,499		-3,322		-10,117	
Glasgow City Development Plan- Additional sites	+1,630	+261	+1,223	+196	+407	+65
Windfall Allowance	+1,500		+1,125		+375	
	-21,446	+2,968	-748	+3,125	-20,638	-157

#### Overall conclusions on housing land

54. From the above tables it is evident that there is a substantial shortfall in terms of meeting the Housing Land Requirement (HLR) in the first five years of the Plan period. Accordingly, the Proposed Plan is not consistent with the statutory strategic development plan for the area, which is the Glasgow and Clyde Valley Strategic Development Plan 2012, contrary to the requirements set out in paragraph 22 above.

55. I accept that the affordable element of that requirement is some 64% of the total for the period 2015-2020, and that a reasonable estimate of delivery in that sector would be 1,000 homes per year. Nonetheless the SDP 2012 HNDA identifies a pressing need for such homes in the City, and I conclude that this scale of shortfall in the Housing Land Supply for affordable homes in the Proposed Plan cannot be ignored.

56. In the private sector, the shortfall is equivalent to almost half (45%) of the annual SDP 2012 requirement at year 1 of the Proposed Plan. I consider that all reasonable potential contributing factors have already been taken into account. Completions to date have been deducted from the requirement, an allowance for an annual windfall contribution to the HLS has been included, and appropriate sites have been added to the HLS, as set out elsewhere in this report.

57. I therefore conclude that the Proposed Plan in its current form is unlikely to deliver

sufficient housing numbers to ensure a five-year effective supply of homes in the City from the inception of the Proposed Plan. A consequence of this significant shortfall could be on-going issues with the maintenance and delivery of the five-year housing land supply, contrary to the requirements of the extant Strategic Development Plan and SPP.

58. Overall, I conclude that given the shortfall in both tenures in the HLS in the period 2015-2020, further options to address this matter are required.

### Options

59. Circular 6/2013 states that “*In limited, exceptional circumstances, the reporter may identify a serious policy omission or deficiency in the plan, such as inconsistency with the National Planning Framework or Scottish Planning Policy.*”. In this instance, the serious deficiency I have identified is the failure to maintain an effective five-year housing land supply.

60. The options explored at the hearing and in examination to address this failure were as follows:

#### *a) allocating more land through the examination process*

61. A number of sites have been explored through the Plan process, and a number have been examined, but there is still an overall shortfall in the HLR and a failure in the five-year effective housing land supply. Allocating additional land for housing through the examination process for the Proposed Plan is limited to those sites which are the subject of unresolved representations, and those which have been through the appropriate public consultation and SEA processes. Where appropriate, such sites have been included in the housing land calculations as set out in the paragraphs above.

#### *b) agreeing a policy mechanism for identifying other additional sites*

62. One option for remedying the shortfall in the 2015-2020 period is to put in place a policy mechanism to identify other sites.

63. The new text in Policy CDP10 will enable sites to come forward that have not been allocated in the Proposed Plan, or sites that have been allocated for later Plan periods. The revised text of Policy CDP10 is set out in the recommendations that follow these conclusions. The recommended modification to the text of Policy CDP10 is intended to facilitate the delivery of homes on appropriate sites in Glasgow, through progressing potential sites identified in the established land supply in conjunction with stakeholders, by delivering homes in the Transformational Regeneration Areas in the City and by advancing Community Growth Areas. The delivery of private sector housing site should also contribute a minimum of 25% of the total number of homes or equivalent to the affordable sector. Any other additional sites will have to comply with the criteria for development as set out in the revised policy text.

64. However, I consider that this mechanism is not sufficient on its own to remedy the serious deficiency which I have identified above. Many of the sites forming part of the established land supply have already remained undeveloped for some years due to a combination of factors which are also likely to limit their ability to deliver homes in the first period of the Proposed Plan.

#### *c) recommending that Supplementary Guidance be prepared*

65. At the hearing, the parties expressed dissatisfaction with the experience of SG for delivering additional housing sites, and I have found that in seeking to ensure a five-year effective supply of housing land, additional SG relating to the delivery of additional homes may not enable the council to deliver any more than the proposed amendments to Policy CDP 10 would. I conclude that in this instance, additional SG would not materially aid the delivery of additional homes in the city.

*d) seeking an early review of the City Development Plan*

66. I therefore conclude that the only effective means of remedying its failure to provide sufficient land for housing in the first five years of the Plan is for the council to carry out an early review of the City Development Plan. In the interim, housing proposals on unallocated sites will fall to be assessed against the terms of the revised Policy CDP10.

#### Affordable Housing

67. The Wheatley Group have set out in their representation that they aim to deliver 3,500 affordable homes in the next seven years. They are keen to ensure that sufficient land is allocated in the Proposed Plan for affordable housing and are concerned that first time buyers are not specifically addressed in the Proposed Plan.

68. The council has responded by advising that the Strategic Housing Investment Plan 2011-2016 sets out the approach that is now reflected in the Proposed Plan, and that it is realistic. The delivery of affordable homes in the City is largely driven by the availability of funding and resources from central government. Should a proposal for affordable housing come forward on a site identified for owner-occupation, there is nothing that would prevent it being used for affordable tenures, subject to compliance with other relevant policies of the Proposed Plan.

69. I find that first time buyers are considered in the private sector element of the housing land calculation, and that given the varying circumstances of individual purchasers it would not be realistic or indeed possible to identify sites for that sector within the Proposed Plan. In addition, there is no requirement for the Proposed Plan to do so under current guidance and regulations.

70. I have concluded that additional sites are required in the Proposed Plan to meet the SDP Housing Supply Indicative Target, as the HLR calculation for the Proposed Plan demonstrates a shortfall in both tenures at year 1 of the first five-year period 2015-2020. However, in relation to affordable housing, and in determining the overall HLR for the Proposed Plan, I agree with the council that it is reasonable to accept that the delivery of homes in the affordable sector should be based on a realistic assessment of delivery, and on that basis the SDP indicative requirement for that tenure sector is very unlikely to be delivered in the Proposed Plan period. In accordance with SPP paragraph 128, the Proposed Plan should acknowledge that the affordable sector HLR cannot be met in full in the Proposed Plan. The Proposed Plan should be modified, with amendments to the Context section of Policy CDP10.

71. I find that representations raising concerns regarding the management of private rented and housing association properties are not a matter for the Proposed Plan. The management of the stock within the affordable sector by third parties, and the manner in which that stock is allocated to individuals, is not a matter that can be addressed by the Proposed Plan. There is no modification to the Proposed Plan arising from the

representation.

### Greenbelt Review

72. The City-wide Greenbelt Review was carried out in 2012, and a number of representations have suggested that its remit did not address the need to identify additional housing sites in the City, and thus the review was flawed in that it did not actively seek to review potential sites in the right context.

73. The Greenbelt Review 2012 has been submitted as a background document to this examination, but does not form part of the Proposed Plan itself. On that basis, it does not form part of the examination and I have no remit to comment on the scope or remit of the document. I recommend no modification to the Proposed Plan.

### Student Accommodation

74. A number of community councils, primarily in the West End of the City, have objected to the perceived concentration of purpose-built student accommodation. The representations seek to have all such developments masterplanned, and/or to have them excluded completely from the West End of the City, and to seek a greater balance between the need for affordable housing and student housing.

75. The council is not supportive of any of the representations, as it considers that purpose built student accommodation meets a recognised demand, and that the proposed SG to accompany the Proposed Plan will address any design issues that arise.

76. I consider that there is a need for student housing in areas either close to campuses or on public transport routes that connect to campuses. Therefore, it follows that certain areas in the City will be more likely to be in demand for such accommodation. Achieving a balance between different parts of the community is difficult, especially when the student population is transient in nature and has different priorities. However, the student population of the City does need to be housed in appropriate locations, and I conclude that Policy CDP10 addresses that need. Purpose-built student accommodation should reduce reliance on houses in multiple occupation, and the proposed SG will address issues of design and placemaking. I recommend no modification to the Proposed Plan.

### Hotels/Hostels/Bed and Breakfast Establishments

77. The representation seeks to exclude all further hostels, hotels and bed & breakfast establishments as they add to an existing problem with a transient population.

78. The council considers that the Proposed Plan and SG will address this issue.

79. I have seen no evidence that such establishments are problematic, and agree that Policy CDP10 and the proposed SG should address any relevant issues that arise when assessing such developments. Should there be any specific issues relating to individual sites, then any such matters can be addressed during the planning application determination process. There is no modification to the Proposed Plan.

### Houses in Multiple Occupation (HMO)

80. The representations made in relation to this issue are by community councils in the

West end of the City. They seek to expand the HMO exclusion area to include a wider area, to include licensing requirements in the Proposed Plan, to limit internal alterations and use of common areas in tenement buildings and to alter the terms of enforcement action against the property, not the owner.

81. The council has responded that the link between licensing and planning is set out in the current SG (OC62) and will be included in the proposed SG. The terms of enforcement action are not a matter for the Proposed Plan; they are set out in the Town and Country Planning (Scotland) Act 1997 and cannot be varied by local development plans. Unless within a listed building, internal works generally do not require planning permission and so cannot be enforced against. Current and proposed SG seeks to minimise the impact of a concentration of HMOs. The extension of the HMO exclusion area will be considered in the preparation of the proposed SG.

82. I find that the current SG addresses the issue of licensing approval in relation to HMOs. The Proposed Plan cannot set out the terms for granting such approvals, as it is outwith the scope of a local development plan to do so. HMOs are now specifically mentioned in proposed SG, and that matter is addressed at Issue 54 of this examination. There is no modification to the Proposed Plan.

83. I concur with the council that it is not appropriate for the Proposed Plan to set out who enforcement action could be taken against in relation to HMOs. That is properly a matter for legislation and there is no modification to the Proposed Plan.

84. Internal alterations in buildings which are not listed do not, in general, require planning permission and so cannot be enforced against. The desirability of retaining the traditional “stacked services” layout prevalent in tenement buildings could be considered in the proposed SG and representations could be made in the public consultation process to that effect but at this point in time there is no modification to the Proposed Plan.

85. Extending the area to be restricted in terms of HMOs has not been the subject of any public consultation exercise, nor have I any evidence to demonstrate that such an extension is warranted. However, I agree with the council that in the preparation of SG, this matter should be pursued and there then would be an opportunity to engage in the required public consultation process. The areas mentioned in the representations should be the basis for any review of the exclusion area but should not limit any such revision, as there may be areas / streets not mentioned which are potentially affected. There is modification to the Proposed Plan.

### Masterplans

86. The site specific issues regarding masterplans raised in representations have been addressed above.

### Glasgow Harbour

87. The representation seeks the land at Glasgow Harbour to be included in the Proposed Plan as ‘consented or subject to legal agreement-housing sites > 50 units’. The council has explained that it considers the site to be under construction. Nevertheless, in view of the scale of this phased development it would be appropriate to include any undeveloped land with planning permission on the Proposals Map as requested.

88. I conclude that the Proposed Plan Policy and Proposals Map should be modified by including all undeveloped land with planning permission at the Glasgow Harbour site.

#### Additional Sites - Housing Sites Not Allocated in the Proposed Plan

##### Ruchazie

89. The representation on behalf of Ruchazie Parish Church submits that all land included in the Scottish vacant and derelict land survey 2012 should be identified for development. Particular reference is made to the concentration of such land around Ruchazie and its adverse effects for local people.

90. The council has responded by referring to policies CDP2 and CP1 of the Proposed Plan which support the reuse of vacant and derelict land. I would expect the council to re-appraise the future use of all derelict land in the vicinity of Ruchazie in its next review of the development plan.

##### Mid Netherton Farm

91. The site is around 3.7 hectares in area and includes a farmstead and outbuildings, hard standing area and vacant agricultural land. It is located next to the Carmunnock bypass and is within the green belt. It adjoins a cemetery and an area of modern housing to the north and west, with open farmland to the south. Mid Netherton Farm is a listed building and the site is within an area of special landscape importance.

92. The Greenbelt review concluded that the site is considered very visually prominent from the Carmunnock bypass, a key approach to the City. As a result, it was considered unsuitable for development.

93. The strategic environmental assessment for the site in the revised environmental report concluded that the site forms part of the green belt separating Castlemilk, Carmunnock, East Kilbride, and Busby/Clarkston. It was considered to be a visually prominent site in the green belt with significant environmental issues and poor access. The site forms part of one of the main approaches to the City from the south. It was considered to be extremely prominent from the south and adds to the visual containment of the Castlemilk area when seen from the by-pass. The assessment indicated that development at this location could result in encroachment with South Lanarkshire.

94. The representation submits that the site is brownfield in nature and a number of non-agricultural businesses are present on site. It is proposed to provide a significant woodland belt buffer along the current boundary fence and by-pass to provide a clear, definable green belt edge for the long term. It is considered in the representation that the site would involve a natural rounding off of Glasgow and an extension to Castlemilk. It is submitted that the site is effective, could provide 100 dwellings and would not lead to coalescence or encroachment.

95. It is clear that the site is in a visually sensitive location. Despite the proposed boundary planting the housing proposal would appear as a prominent area of development and as an incursion to the countryside and green belt next to the bypass. The site should not be allocated for housing in the Proposed Plan. There will be no modification to the Proposed Plan.

### Leverndale Hospital - Site D

96. The site is located to the west of Crookston, between housing and the White Cart River. It is green belt, a site of special landscape importance, is covered by tree preservation orders and has a significant flood risk. The site is adjacent to a site of importance for nature conservation and a green corridor.

97. The Greenbelt Review explains that the primary function of the green belt around Crookston is to provide separation and prevent coalescence between Glasgow and Paisley, at a location (between the White Cart and Hurlet Road) where the green belt has been substantially reduced due to housing developments on both sides of the administrative boundary. East Renfrewshire Council expressed concern regarding coalescence during City Plan 1, however, it did not object to that Plan's green belt release at Crookston and Leverndale, provided no further release was considered.

98. Site D is identified as zone 2.2 in the review. It was considered to provide an important landscape setting for the listed buildings and an attractive greenspace for local residents. It was recommended that the site should be retained as green belt and that the inner green belt boundary could be strengthened to more appropriately define the urban edge.

99. The strategic environmental assessment for the site in the revised environmental report concluded that the significant environmental designations would be very difficult to mitigate against. A detailed flood risk assessment would need to determine impact on the functional flood plain. Further investigation would be required in relation to protected/important species. It was indicated that there may be a small area at the bottom of the slope (underneath the tower) on which development is possible, but the scale of this would deliver little benefit in terms of meeting housing need, and would have a significant landscape impact.

100. The representation advises that the strategic environmental assessment considered a 10.12 hectare site and not the 3.6 hectares proposed for development. The area subject to flood risk would be avoided and no protected trees would be affected. A green wedge would be left to the White Cart and there would be no detriment to the site of importance for nature conservation or the green corridor. The representation submits that the site is effective and could deliver 100 houses in a single phase of 2-3 years.

101. The site is clearly the subject of significant environmental constraints, serves an important green belt function and should not be allocated for housing in the Proposed Plan. The small area of land mentioned as a possibility for development in the strategic environmental assessment would have to be the subject of further investigation to establish whether the impact on the landscape could be mitigated. The issue may be a matter for consideration as part of the next review of the local development plan.

### Leverndale Hospital - Site F

102. The site is located at the western edge of Crookston. The land rises to woodland designated as ancient, long-established or semi-natural. Bull Wood is designated as a C-site of importance for nature conservation. The land is within a site of special landscape importance and is next to a green corridor.

103. Site F is identified as zone 2.3 in the Greenbelt Review. The review concluded that



the importance of the landscape as a setting for recent development, the issue of coalescence with East Renfrewshire and the sensitive environmental designations rendered the area inappropriate for additional development. The Crookston spine/link road was under construction at the time of the site visit. The review advised that the completed road would provide a strong and defensible green belt boundary.

104. The strategic environmental assessment for the site in the revised environmental report concluded that the significant environmental designations would be very difficult to mitigate against. A detailed flood risk assessment would need to determine the extent of the functional flood plain. Further investigation would be required in relation to protected/important species. It was indicated that there may be some scope for limited development related to the Crookston spine/bus link road proposed in the eastern part of the site, west of the existing built up area which cuts (north to south) through the eastern edge of site, but the scale of this would deliver little benefit in terms of meeting housing need, and would have a significant landscape impact.

105. The representation advises that the strategic environmental assessment considered a 26.75 hectare site and not the 5.2 hectares proposed for development. It is indicated that flood risk is not a significant issue and development would not involve the removal of any of the trees in Bull Wood. The proposal would allow the opportunity to improve accessibility and provide space for informal recreation. Retention of the mature woodland would act as a defensible boundary and prevent coalescence with East Renfrewshire. The representation submits that the site is effective and could deliver 150 units over a period of 4-5 years.

106. The site is clearly the subject of significant environmental constraints, serves an important green belt function and should not be allocated for housing in the Proposed Plan. The land next to the Crookston spine/bus link road mentioned as a possibility for development in the strategic environmental assessment would have to be the subject of further investigation to establish whether the impact on the landscape could be mitigated. The issue may be a matter for consideration as part of the next review of the local development plan.

#### Hamilton Road/Mount Vernon

107. The site is around 0.7 hectares in area. It is located to the north of Hamilton Road and is adjacent to Mount Vernon railway station. The land to the east, (currently used by the Dogs' Trust as an exercise area) is allocated for residential development in the adopted City Plan and is shown as Proposal H088 in the Proposed Plan. The site includes the Daldowie Dovecot. This is a category A listed building, although it has been re-located from its former site within the grounds of Daldowie estate. Access to the dovecot has been created from Hamilton Road and it has a small car parking area.

108. The site is in a sustainable location and has an established landscape framework. There is an opportunity to protect the long term integrity and setting of the dovecot. The site was affected by fly-tipping at the time of the site visit. The site is proposed to be removed from the green belt following the council's Greenbelt Review. The council advises that the site is identified on the PAN 65 Open Space Map as a green corridor. However, the representation on behalf of the landowner contends that a housing development could be designed which has no materially negative impacts on the green corridor/network. The Greenbelt review recommended that the use of the site for residential development should be investigated. The site owner advises that early

development of the site could be progressed and that the site would be fully effective/deliverable within the Proposed Plan period.

109. The site does not appear to have been the subject of a strategic environmental assessment or public consultation as part of the preparation of the Proposed Plan. The issue may be a matter for consideration in the next review of the local development plan, but there will be no modification to the Proposed Plan.

#### Balmore Road/Hillend Road

110. The site is owned by the Possil Estate and located in the Lambhill area of north Glasgow. It has a developable area of around 2.2 hectares and could accommodate approximately 86 dwellings based on an overall density of 40 dwellings per hectare. It is largely vacant and part used as temporary allotments by agreement with the owners and local residents. The site includes a disused mine shaft and closed refuse tip. It is in a sustainable location with good access to local bus services, Parkhouse railway station and shops, schools and community facilities. Vehicular access could be achieved from either Hillend Road or Kings Place.

111. The owners consider that the site is effective and could be developed within 5 years. There are no ownership issues. There are physical constraints and potential contamination but these matters are not considered to be insurmountable following a site investigation report in 2007. That indicated that the area presented a low environmental risk outwith the areas around the mineshaft and former refuse tip. Those areas were classed as medium risk and the Possil Estate advises that it is committed to undertake phase 2 intrusive investigations to identify and then undertake the mitigation works required.

112. The site can be funded solely through private funds. The owners consider that once permission in principle has been secured there will be an interest in developing the site because of the more positive market conditions. There are no infrastructure issues. The council advises that the site is identified as "Other Functional Greenspace: Allotments" on the PAN 65 Open Space Map. However, the allotment use is partial and temporary in nature and appears to be on the steeper sloping part of the site. Compliance of a housing proposal with policy CDP 6: Green Belt and Green Network of the Proposed Plan and relevant supplementary guidance would have to be assessed by the council if a planning application is considered. The contribution that the site could make to the housing land supply is an additional factor. Claimed benefits from developing the site include remediation and use of brownfield land, improving the attractiveness of the area for investment, environmental enhancement including landscaping and economic benefits through construction jobs. The Possil Estate has indicated that it is intended that a planning permission in principle application will be submitted to the council.

113. The council considers that in view of the site's open space protection it would be inappropriate to identify it as a housing opportunity. However, from the evidence that has been submitted it appears that the site is capable of becoming effective if that land use issue can be resolved. The site was deleted from the housing land supply in 2000 due to lack of progress. It does not appear to have been the subject of a Strategic Environmental Assessment or public consultation as part of the preparation of the Proposed Plan. The issue may be a matter for consideration at the next review of the local development plan, but there will be no modification to the Proposed Plan.

Auchinairn Road, Robroyston

114. This site is located within the green belt and is an area of special landscape importance. Part of the site is proposed for housing in Proposal H111 (80 houses). This follows the Greenbelt Review, which concluded that the land comprising zone 6.4 should not be released from the green belt, with the exception of the land identified for housing development in the 2009 Community Growth Area Masterplan. Proposal H111 would occupy agricultural land, separated from housing to the south by existing woodland. The proposal put forward in the representation suggests a larger developed area with an indicative capacity of 300-500 units. The representation includes an indicative masterplan, an engineering appraisal and a landscape and visual appraisal.

115. The Greenbelt review considered that the development design for the housing proposal should reflect a placemaking approach, should not adversely impact on the Wester Lumloch local site of importance for nature conservation, or isolate it from the wider green network/green belt. It should deliver enhancements to the wildlife value of the local site of importance for nature conservation. Scottish Natural Heritage had recommended a buffer of enhanced habitat on the north side of the Stand Burn. It was considered that there should be a strong and robust green belt boundary.

116. The strategic environmental assessment for the western part of the site in the revised environmental report concluded that mitigation would be required to overcome the significant environmental issues. Particular attention would need to be given to the design of any new development given the proximity to the site of importance for nature conservation and the elevated slope of the site which provides a distinct landscape setting to the new and proposed Robroyston communities. A detailed flood risk assessment would be required.

117. The eastern part of the site has a rural character. The narrow winding Lumloch Road has a junction near Wallace's Well with Langmuirhead Road. Housing would have a significant visual impact in this part of the site because of the rising land to the north-west. Open space is proposed to complement the setting of the well. However, this would have little practical benefit because the well and its pedestrian access would be at the opposite side of Langmuirhead Road.

118. The engineering appraisal concluded that, whilst there are a number of engineering considerations, a large residual area remains developable for residential use. The indicative masterplan shows proposed site H111 extending towards Robroyston Road in the west, Auchinairn Road in the north and either side of Lumloch Road in the east. The landscape appraisal considered that development of the north facing slopes of the central part of the site would have significant and adverse effects upon visual amenity and landscape character from within the rolling farmland to the north of the proposed development site. However, it was considered that development on the north facing slopes of the western part of the site is not similarly restricted due to adjacent residential areas, which provide context and the rising topography to the east and north, which provides screening. It is intended to provide an appropriate landscape setting for new residential development which will also result in habitat creation, extension of the woodland communities in the adjacent site of importance for nature conservation, local biodiversity gains and allow removal of part of the site from the green belt without materially affecting the role of the green belt in terms of maintaining settlement separation. The main elements of landscape mitigation proposed are:

- retaining the north slopes in agricultural use;

- creating new areas of structural woodland on the 82 metre contour ridgeline between the north and south facing slopes of the western part of the site to provide visual integration and to screen the higher land in views from the north;
- reinforce the eastern boundary of the eastern part of the site to provide visual integration of the development when seen from the east;
- reinforce the southern boundary of the western and central sites to provide an adequate buffer from the adjacent site of importance for nature conservation;
- provide an appropriate amenity landscape buffer to Robroyston Road and the adjacent residential areas to the immediate west, and
- concentrate development on the south and west facing slopes where it will be seen in the context of existing and future residential development and in a similar woodland matrix.

119. The proposed site would introduce development of a much larger scale and extent within an area of special landscape importance. Scottish Natural Heritage, and East Dunbartonshire Council expressed concern over the release of the site for housing at the main issues report stage and at the 2012 additional sites consultation of the Proposed Plan, with landscape being a particular concern. The concerns have been confirmed by the council's own analysis. Representations have submitted mitigation measures as indicated above and a larger proposal would help to offset the shortfall in the housing land supply. However, the benefits from a development of the size and extent proposed in representations would not outweigh the harm to the quality and character of the landscape in this sensitive location. There will be no modification of the Proposed Plan.

#### Damshot Crescent

120. The site is located between a housing area at Damshot Crescent and the M77. It is within walking distance of Pollok town centre and community facilities, with access to bus services. The site is greenspace, a site of special landscape importance, subject to flood risk, a historic garden and designed landscape and is adjacent to green belt, a green corridor, a site of importance for nature conservation and a conservation area (Pollok Park). The representation includes an indicative masterplan which retains part of the green corridor and the woodland areas. The capacity of the site is estimated at around 70-100 units, depending upon mitigation for noise and flood risk. A significant buffer would be left next to the M77 and White Cart Water. Access would be from Damshot Crescent. The representation indicates that the site is effective with an opportunity to develop within the first 5 years of the Proposed Plan and that there is housebuilder interest.

121. The site was separated from the open land of the Pollok Estate by the construction of the M77 and retained its historic garden and designed landscape designations. The Greenbelt Review concluded that whilst some residential development may be justifiable against Policy CDP6: Green Belt and Green Network, and associated supplementary guidance, the need to maintain the site's natural heritage functions, including flood management, means that this would require to be limited and very well designed, given the need to respect the landscape setting and maintain the site's natural heritage functions.

122. At the proposed additional sites consultation stage Historic Scotland was content that, with appropriate mitigation, it should be possible to accommodate some residential development in the location. Scottish Natural Heritage advised that it would be content for the site to be taken forward provided that the footprint was specifically limited to take

account of natural heritage issues, ideally through modification of site boundaries. However, it believed that there may be little or no capacity for development on the site, given the need to maintain its natural heritage functions. Firstly, it was seen as having a particular value to the local community as recreational greenspace which, before construction of the motorway, was an integral part of the Pollok Park designed landscape. Secondly, the site's mosaic of woodland and grassland gives it an additional green network value. In Scottish Natural Heritage's view ecologically the mosaic augments the wildlife corridors of both the M77 to the east and White Cart Water to the north, and in landscape terms it is the defining characteristic of the pocket of the site of special landscape importance.

123. The site has been the subject of a Strategic Environmental Assessment (Revised Environmental Report). The assessment indicated that there may be some scope for limited development on the southern part of the site around the school, providing compensatory provision can be made for loss of greenspace in the form of enhanced access and management of the remainder of the site and cognisance is taken of the existing designed wooded areas. A flood risk assessment would be required and consideration given to the need for a buffer alongside the motorway and potential traffic noise issues.

124. The proposed site capacity of 70-100 houses would be a significant development rather than limited, as suggested by Scottish Natural Heritage and in the Revised Environmental Report. The development footprint would extend across most of the front of the site and up to the M77 embankment in depth. An area of greenspace would be left alongside White Cart Water where the land would be likely to be affected by flooding. The proposed development would occupy the land that is most accessible for use as open space by the existing residents of Damshot Crescent. The contribution that the site makes to the green network would be diminished and it is unclear how any ecological interest would be accommodated.

125. Proposed Plan Policies CDP6: Green Belt and Green Network and CDP7 Natural Environment are relevant. In view of the Greenbelt Review's conclusions, the council rejects the suggestion that the site could be developed with appropriate mitigation. The council also refers to the considerable amount of house building in the south west of the City in recent years.

126. This is a site of special landscape importance that provides a wildlife habitat, green network and green corridor function. It was designated as protected open space when its green belt status was removed. Taking all matters into account there may be scope for a limited amount of development, but not enough to make a substantial contribution to the housing land supply. It would not be appropriate to allocate the site as a housing proposal until the site constraints have been appraised in detail in association with relevant consultees and when a development of an appropriate scale and siting has been designed that clearly demonstrates that any consequential harm may be successfully mitigated.

127. I therefore propose to make no modification to the Proposed Plan.

#### Kennishead Farm

128. The site is located between Boydstone Road and the M77. The site is green belt, a site of importance for nature conservation, a site of special landscape importance,

contains listed buildings (the farmhouse at 532 Kennishead Road is C listed and on the buildings at risk register) and is within Pollok Conservation Area. The site is also adjacent to ancient long established or semi-natural woodland and green corridors. It is a wet low lying site and there are major drainage issues. The adjacent Pollok Park is listed on Historic Environment Scotland's inventory of gardens and designed landscapes.

129. The representation seeks to allocate the site for private housing as an effective opportunity in the first 5 years of the Proposed Plan for 60-100 units. It asserts that there is nothing in the council's assessment of the site that cannot be mitigated through design. The intention is to only partly develop the site taking into account the ancient woodland and wetland areas and maintaining the greenspace function. There are considered to be no environmental issues that would be adversely affected by the development of the site in the general manner proposed and that a flood risk assessment will establish any issues relating to the viability of developing any part of the site. It is further submitted in the representation that the future of the site as green belt is compromised by the Cowglen masterplan developments, the leisure proposals attached to Silverburn, the M77 and the site's proximity to Carnwadric and Darnley. Furthermore, it is considered that the site presents an opportunity to develop a former caravan site and rehabilitate a listed group of farm buildings in a location adjacent to a railway station, bus route and close to facilities.

130. The Greenbelt Review referred to the previous examination Reporter's comments that the site was detached from the residential area, is a significant area of green space and forms part of the green network. The green belt designation was retained, although it was indicated that there might be scope for limited development to help secure the retention of the deteriorating listed farm buildings. It was added that this could be considered as an exception to Policy CDP6 and associated supplementary guidance. Scottish Natural Heritage concluded at the additional sites consultation stage that it did not support the site being taken forward into the Proposed Plan, due to strong concerns about the principle of development at the proposed scale. In terms of landscape character, Scottish Natural Heritage concluded that it was more likely that development would have significant adverse impacts. It added that the site's juxtaposition of fields rising to long-established woodland announces the proximity of Pollok Park to motorway users, giving a distinct sense of place. Considering this quality, it considered that was unlikely that built development could be compatible with the site's designation as part of a site of special landscape importance, except perhaps in its south-east corner.

131. The site has been the subject of a Strategic Environmental Assessment (Revised Environmental Report. Despite the views expressed in the representations, the assessment concluded that the significant environmental designations would be very difficult to mitigate against.

132. It is accepted that the housing land requirement cannot be met solely by brownfield sites. The representation submits that there has been a mis-match of opportunity in the city and that the south-west has not been properly assessed through any comprehensive study. In contrast the council considers that there has been a considerable amount of house building in the south-west with two large scale green belt releases and development at Leverndale Hospital. The council advises that the Cowglen development involves a brownfield site outwith the Pollok Estate conservation area and the green belt and that the Cowglen development will have no impact on the relationship between Kennishead Farm and the rest of the Pollok Estate.

133. The Kennishead Farm site and rest of the Pollok Estate form a unique enclave of

countryside and green belt within the confines of the City. The Greenbelt Review determined that the site should retain its green belt status as part of an assessment of the green belt as a whole for the City area. This conclusion, and the sensitivity of the site in terms of its designations as a site of importance for nature conservation and a site of special landscape importance lead me to the view that Kennishead Farm should not be allocated for housing in the Proposed Plan.

134. I therefore recommend no modification to the Proposed Plan

#### Temple Road

135. This is a relatively small linear site which includes an existing pair of semi-detached houses and a former haulage contractors' yard. It is likely that redevelopment, including treatment of contamination, would only result in a limited contribution towards the housing target in the Proposed Plan period. The council advises that submission of the proposal was out of time. The site has not been the subject of a strategic environmental assessment or public consultation as part of the preparation of the Proposed Plan. The location of the access near a rail bridge and road junction may be a constraint on the number of units that the site could accommodate. It should not be allocated for housing in the Proposed Plan. There will be no modification to the Proposed Plan.

#### Reporter's overall conclusions on housing sites

136. For the above reasons, I recommend no modifications to the Proposed Plan regarding the housing sites not allocated in the Proposed Plan and subject to representations.

#### **Reporter's recommendations:**

Modify the Proposed Plan by inserting new paragraph 2 in Context on Page 54 as follows:

*"The council's Housing Investment Team advises that a realistic level of delivery in the affordable sector in Glasgow would be approximately 1,000 homes per year. The delivery of affordable homes in the city is driven and determined by the availability of funding and resources, and is often delivered by agencies other than the council. The contribution of the private sector in delivering affordable homes in the city is some 25% of the total homes completed on such sites, either in actual homes or an equivalent contribution. The affordable element of the Housing Land Requirement in this Plan is some 88% of the total requirement in the period 2015-2020. The constraints on delivering affordable home are acknowledged, but nonetheless the SDP 2012 HNDA identifies a pressing need for such homes in the City, and the scale of shortfall in the Housing Land Supply for affordable homes in this Plan is such that the council must continue to work towards maximising delivery throughout the Plan period."*

Modify the Proposed Plan Policy and Proposals Map by including all undeveloped land with planning permission at the Glasgow Harbour site.

Include Clyde Gateway sites on the Housing Schedule and the Policy and Proposals Map.

Remove table within Policy CDP10 and notes relating to additional locations and place in

Context page 53, column 3, before the sentence beginning “*In terms of...*”

Existing Table 4 should be deleted from the Context section preceding Policy CDP10, and replaced with the following table:

Glasgow CDP Housing Land 2015 – 2025

	Total	Total	Private	Private	Affordable	Affordable
	2015-2020	2020-2025	2015-2020	2020-2025	2015-2020	2020-2025
SDP Housing Requirement + 10% SPP allowance	25,586	15,651	9,086	7,850	16,500	7,801
Glasgow City Development Plan - Housing Supply	14,509	18,358	9,312	10,779	5,197	7,579
SDP HLR 2009-2014 Shortfall	-13,499		-3,322		-10,117	
Glasgow City Development Plan- Additional sites	+1,630	+261	+1,223	+196	+407	+65
Windfall Allowance	+1,500		+1,125		+375	
	-21,446	+2,968	-748	+3,175	-20,638	-157

Remove bullet point within Policy CDP10 relating to Robroyston [there is no need for individual notes in Policy text as already in Context text].

Remove reference to individual NHS sites [there is no need for individual notes in Policy text].

Remove reference to Western Infirmary site [site now required for university campus purposes]

Public Transport, Access and Transport Assessment be added to the list of relevant SG on page 54 of the Proposed Plan.

Append Schedule of Housing Sites to the Plan.

The current text for Policy CDP10 as set out in the Proposed Plan should be deleted in full and replaced with the following consolidated text:

*“Policy CDP 10 – Meeting Housing Needs*

*Table 4 - Glasgow CDP Housing Land Requirement (+10% generosity allowance)*

	15-20	+10%	20-25	+10%
<i>Private</i>	8,260	9,086	7,136	7,850
<i>Affordable</i>	15,000	16,500	7,092	7,801
<i>Total</i>	23,260		14,228	
<i>+10%</i>	25,586		15,651	



*The Council will:*

- *Aim to deliver the land for housing identified in Table 4, and as set out in the Schedule of Housing Sites appended to this Plan;*
- *Maintain a five-year supply of effective housing land at all times;*
- *Monitor the housing land supply annually through the annual Housing Land Audit and the Action Programme;*
- *work with the house building industry and the Scottish Government to address site constraints and infrastructure issues on sites in the established housing land supply*

*Where an audit identifies that the five-year effective supply is not being maintained, the Council will support housing development proposals for all tenures that can be delivered in accordance with the approach set out in Strategy Support Measure 10 of the Strategic Development Plan 2012. Such sites will be supported if they:*

- *are capable of delivering completions in the next five years;*
- *can address infrastructure constraints;*
- *are in a sustainable location as guided by Diagram 4 of the Glasgow and Clyde Valley Strategic Development Plan; and*
- *are capable of complying with other relevant policies and proposals in this Plan, and any relevant Supplementary Guidance.*

*In addition to supporting the development of the effective and established housing land supply, the Council will:*

- *Undertake a feasibility study to examine environmental, hydrological and infrastructure issues in the larger area to the north of Summerston, including phasing and delivery, to assess the potential for additional housing land in the area highlighted on the Policy and Proposals Map;*
- *Support mixed tenure solutions on the six active Transformational Regeneration Areas, and in the two Transformational Regeneration Areas which are not currently active, as identified on the Policy and Proposals Map;*
- *Advise on the preparation of masterplans for the three greenfield locations within the Gartloch/Easterhouse Community Growth Area and the surplus NHS locations, as identified on the Policy and Proposals Map;*

*Affordable Housing*

*The affordable sector targets of the Glasgow Housing Strategy will be met, and these targets will be reviewed annually in the Strategic Housing Investment Plan. The Council will support partner organisations in the provision of homes in the affordable sector.*

*Student Accommodation*

*The Council will, subject to compliance with other policies in this Plan, generally support purpose-built student accommodation which achieves a high standard of amenity and an appropriate range of accommodation and is:*

- *In or adjacent to identified main campuses;*
- *In locations with good access to university and college locations by public transport and active travel routes."*

Issue 18	Housing Proposal H002 Abercrombie St/Green St (S Calton)	
Development plan reference:	Policy CDP 10 Meeting Housing Needs (Pages 53-55)	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Richard Galvin (00032)		
Provision of the development plan to which the issue relates:	H002 Abercrombie St/Green St (S Calton) is a site from the 2012 Housing Land Supply which provides for the construction of approximately 90 houses. It is proposed that all of these houses will be affordable, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00032/1/001 Richard Galvin - Object to housing proposal H002, on the basis that it would completely disrupt a business trading at Tobago Street, with the strong possibility of this business (which has been established over 40 years) failing, and the loss of at least 10 jobs.		
Modifications sought by those submitting representations:		
00032/1/001 Richard Galvin - Deletion of Proposal H002 from the Policy and Proposals Map or amendment of proposal.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00032/1/001 Richard Galvin - Proposal H002 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This Brownfield site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.  No application has been submitted for this site. Any development of the site would require the consent of all the owners.  No modifications recommended.		
Reporter's conclusions:		
1. The site includes areas of mainly vacant overgrown land located at either side of Tobago Street and a group of vacant buildings at the Stevenson Street/Tobago Street		

junction.

2. The representation seeks to exclude the premises belonging to Galvin Garages at 73/75 Tobago Street and opposes the blocking/changing of Tobago Street.

3. Although part of Tobago Street is included in the site, it does not appear to me that it would necessarily have to be blocked for access. That would depend upon any proposed housing layout. It is also possible that parts of the allocation could be developed for housing excluding Nos.73-75 Tobago Street, subject to appropriate measures to mitigate any impacts from the business and commercial premises that would remain.

4. Any major housing proposal greater than 50 units would require pre-application consultations with land-owners. If a planning application was submitted I would expect the council to carry out further public consultation. This would provide additional opportunity to comment on details of the proposal and any planning considerations that it might raise, including the effect on local businesses. I consider that Nos.73-75 should be included in the proposed addition to the housing land supply at this stage. This would provide the owner with the option to consider involvement in any future development proposals or to retain the premises for commercial use.

**Reporter's recommendations:**

No modifications.

Issue 19	Housing Proposal H003 W Graham St/Scott St (West)	
Development plan reference:	Policy CDP 10 Meeting Housing Needs (Pages 53-55)	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Garnethill Community Council (00450) Susan Steele (00811)		
Provision of the development plan to which the issue relates:	H003 W Graham St/Scott St (West) is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 50 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00450 Garnethill Community Council - Objection to housing proposal H003. Resources should be concentrated on existing housing stock and infrastructure in Garnethill rather than new builds. Development of this site would contradict the aspirations of the proposed CDP, which advocates prioritising the development of brownfield sites over greenfield. Considering the existing density of built up area in Garnethill and the proximity of pollution from the motorway, green space development and maintenance is a priority for the promotion of improved air quality and good health. Educational establishments within the area have identified needs for substantial developments. This site has potential for development to meet these needs.  00811 Susan Steele - The proposed development is unacceptable for a number of reasons. These include:  This is going to significantly impact on the character of the neighbourhood. It appears that the proposed development will be overbearing and out of scale with the rest of the developments in the neighbourhood. It is going to affect the view from a number of properties. In short the loss of existing views from neighbouring properties would adversely affect the residential amenity of neighbouring owners.  Noise and disturbance from the flats due to the number of properties and number of people. This development will substantially overlook other properties and has the potential to significantly impact on others in terms of their living situation due to this. This could have the potential to affect the quality of life in the residents overshadowed by the building. Loss of green space/garden land - This will be a dense residential dwelling and has the potential for the site to be overdeveloped, again impacting on the character of the neighbourhood.		
Modifications sought by those submitting representations:		
00450 Garnethill Community Council, 00811 Susan Steele - Proposal H003 - West		

Graham Street/Scott Street (West) to be deleted as a housing proposal from the City Development Plan.

**Summary of responses (including reasons) by planning authority:**

Objecting

00450 Garnethill Community Council - Proposal H003 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.

Although this site appears to be grassland, it is considered to be brownfield, having previously been occupied by flats. SPP's preference for brownfield is also supported by the SDP and the City Development Plan through Policy CPD 2: Sustainable Spatial Strategy. Any planning application for new housing would have to take account of the need to provide car parking, to consider air quality, and would require to be of appropriate density, in compliance with Development Plan policy.

Issues relating to car parking for existing residents, use of resources on existing stock and infrastructure, and unreported houses in multiple occupancy are not relevant to the consideration of this proposal.

No modifications recommended.

00811 Susan Steele - Presently there is no valid application submitted. Any planning application for new housing would have to take account of the any loss of privacy, overshadowing, loss of green space, density, and surrounding environment and as such be of a good quality design and scale.

Loss of views and noise are not material planning considerations.

No modifications recommended.

**Reporter's conclusions:**

1. The site is an area of sloping grassed land with occasional trees, located next to the large vacant Kelvin College building. It is opposite housing along West Graham Street and Scott Street. The site is bounded by a sturdy fence and there appears to be no easy public access.

2. Garnethill Community Council considers that resources should be concentrated on existing housing stock and infrastructure in Garnethill rather than new build. Concerns are also raised regarding loss of greenspace and parking provision. It is also submitted that the site could meet the needs of educational establishments, although no details are submitted.

Need for housing

3. I acknowledge the emphasis placed on the existing housing stock by the Community Council. However, we have concluded at Issue 17 above that there will be a shortfall in the housing land supply. The site has the potential to contribute towards meeting the demand for housing towards the end of the Proposed Plan period.

Parking

4. Parking provision at the site would be a matter for the council to consider within the context of the demand for parking in the general area, if a planning application was submitted. Given that the Kelvin College building was being marketed at the time of my site inspection it is possible that the use of proposed housing allocation H003 could be considered by the council in relation to a wider proposal.

Greenspace

5. Although the site has a green appearance it was formerly occupied as flats and on that basis it has to be considered as a previously developed/brownfield site. I note the Community Council's comments that there is a clear need for variety of greenspace and imaginative incorporation of nature into new developments. The council would have to assess the impact of the loss of this incidental green space if the whole of site H003 was to be developed and consider how such a loss could be mitigated.

Residential amenity

6. Matters including the visual impact and scale of development, air quality, effect on the outlook from properties, potential overlooking/loss of privacy, overshadowing and the possibility of noise and disturbance for existing residents would also have to be taken into consideration by the council. If an application was submitted I would expect the council to consult neighbours in accordance with its normal development management procedures. A proposal in excess of 50 dwelling units would have to be the subject of pre-application consultation.

Other matters

7. The population density in the area and impact of possibly unreported multi-occupancy of buildings would be separate matters for investigation by the council, and is not part of this examination of the local development plan.

**Reporter's recommendations:**

No modifications.

Issue 20	Housing Proposal H004 Bunhouse Rd/Kelvin Walkway	
Development plan reference:	Policy CDP 10 Meeting Housing Needs (Pages 53-55)	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Laurence King (00455) Friends of the River Kelvin (00503)		
Provision of the development plan to which the issue relates:	H004 Bunhouse Rd/Kelvin Walkway is a site from the 2012 Housing Land Supply which provides for the construction of approximately 86 houses. It is proposed that all of these houses will be affordable, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00455 Laurence King - Objection to proposal H004 - H004 borders the River Kelvin, which is a narrow constrained green corridor for Glasgow. Green and open spaces are vital to the wellbeing of residents in Glasgow, enable biodiversity, and provide amenity and incentive to improve health. Recent planning approvals within the West End of Glasgow have the potential to prevent the River Kelvin from being 'green route' for the natural movement of wildlife. Further development should not take place here, but work should be done to improve habitat and wildlife support within the area to ensure there is a natural corridor to and from the River Clyde.  00503 Friends of the River Kelvin - Objection to housing proposal H004. No residential development should occur on any part of the riverbank unless mitigation considerably exceeds the loss. Housing development on this site would result in the green corridor being interrupted. The green corridor, views, architectural heritage and river access would all be compromised unless appropriate conditions are attached to the final proposal.		
Modifications sought by those submitting representations:		
00455 Laurence King, 00503 Friends of the River Kelvin - Proposal H004 - Bunhouse Road/Kelvin Walkway to be deleted as a housing proposal from the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00455 Laurence King, 00503 Friends of the River Kelvin - Proposal H004 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due		

to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.

No planning application has yet been submitted for the site. As this site neighbours onto the green corridor and a grade B listed Building, any planning application for new housing would have to take account of this site's sensitive nature, in compliance with Development Plan policy. Should the application be considered to be a major development, a pre-application consultation process with the local community would be required.

No modifications recommended.

### **Reporter's conclusions:**

1. The site is an elongated area of land currently used as a car park. It is located between Bunhouse Road and the River Kelvin.
2. I note that the Friends of the River Kelvin object to housing in principle but are willing to contribute to any proposed study on condition that a number of matters and concerns are taken into consideration and that adequate mitigation is provided.
3. We have concluded at Issue 17 above that there will be a shortfall in the housing land supply. The site is capable of contributing towards the housing land supply towards the end of the Proposed Plan period. The current car park use, whilst meeting a need for parking provision, adds little to the quality of the area. From my site inspection I noted the presence of bird species that depend upon the river and its banks. Even though the river corridor is narrow and urbanised it clearly is an important green link within the city. Recent high rise development has been constructed close to the edge of the river. Student housing is also under construction near the south-western end of the proposed site.
4. The council has indicated that if a planning proposal was considered to constitute a major development (over 50 dwellings) a pre-application consultation process with the local community would be required. I would expect that a planning application for a smaller number of dwellings would also be the subject of public consultation in accordance with the council's development management procedures.
5. The representations to the Proposed Plan raise a number of material considerations that would have to be assessed by the council. These considerations include the integrity of the green corridor alongside the River Kelvin, pedestrian and cycle access to the riverside, the effect on views from Partick Bridge and impact of development on the architectural heritage of the area, notably the category B listed building of Kelvin Hall that is undergoing refurbishment. The retention of existing trees and shrubs along the river bank, new planting and habitat management are additional factors.
6. I consider that the site should be retained as a housing proposal on the basis that these matters are given full consideration at the pre-planning or application stage. Proposals would have to be assessed against Proposed Plan policies, including CDP7: Natural Environment and CDP 8: Water Environment. It should be possible to provide a development of a suitable size and scale to complement the riverside location, provide riverside access and appropriate wildlife mitigation.



**Reporter's recommendations:**

No modifications.

Issue 21	Housing Proposal H005 Water Row	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55)	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
John Foster (00083) Tom Manley (00513) Govan Reminiscence Group (00648)		
Provision of the development plan to which the issue relates:	H005 Water Row is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 100 houses. It is proposed that 50 houses will be for sale and 50 houses will be affordable. All are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00083 John Foster - The general principle of using derelict sites across the City for residential development is broadly welcomed, however, concerns are raised about the potential for future development of the public spaces along the River Clyde front. This could block views across the river. It is essential to safeguard these spaces in terms of amenity and in order to develop Govan's town centre and heritage as a tourist attraction.  00513 Tom Manley - Objection to housing proposal H005. This is a potentially key site in the regeneration of Govan and should not be designated solely for housing. A truly integrated plan should be developed that incorporates community facilities, landscaping, tourism and heritage interpretation assets, in addition to a more limited number of houses. Although housing offers economic viability and profit, it is not going to create the sense of place this site deserves, and a comprehensive and integrated rezoning of this whole area requires stakeholders and the community to develop a shared vision.  00648 Govan Reminiscence Group - Objection to housing proposal H005. No objection to the principle of housing on this site, however, the boundary requires to be amended to allow for a public space or green area where the site adjoins the public square at Govan Cross. This part of site is the location for the ancient Doomster Hill, proposals should reflect its unique and rich history by providing a vista to the river from the town centre is pivotal in the successful regeneration of Govan. The removal of wall at the north side of the public square at Govan Cross a few years ago opened up the river to the public and brought it into the heart of Govan with views of the River, Glenlee and Riverside Museum. Proposal H005 shows housing standing where this wall stood, effectively cutting of the public square at Govan Cross from the river again.		
Modifications sought by those submitting representations:		
00083 John Foster - Open spaces along the Riverfront to be protected, along with the area between these spaces and the river.		

00513 Tom Manley - Proposal H005 - Water Row to be deleted as a housing proposal from the City Development Plan.

00648 Govan Reminiscence Group - The boundary to housing proposal H005 - Water Row should be amended in the City Development Plan.

### **Summary of responses (including reasons) by planning authority:**

#### Objecting

00083 John Foster - Proposal H005 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.

The site was included in the Housing Land Supply on the basis of information from the Council's Housing Investment team. No planning application for residential development has been submitted, and therefore the future use of the site (including the opportunity to protect open space and access to the river) has yet to be considered. The Clyde Walkway is identified as a Core Path in the Council approved Core Paths Plan, and would therefore require to be taken into account in the assessment of any proposal.

The loss of views are not planning related matters.

No modifications recommended.

00513 Tom Manley - The site was included in the Housing Land Supply on the basis of information from the Council's Housing Investment team. No planning application for residential development has been submitted, and therefore the future use of the site (including the opportunity to reflect the heritage assets of the area) has yet to be determined.

No modifications recommended.

00648 Govan Reminiscence Group - No planning application has been submitted for the site. Access to the river by way of dedicating part of the site for public use would be a matter for discussion in advance of any proposal being submitted. The route along the River Clyde as it crosses the site is an aspirational core path in the Council approved Core Paths Plan.

The loss of views is not a material planning consideration.

No modifications recommended.

### **Reporter's conclusions:**

1. The site is located on the banks of the River Clyde at Govan. It includes a large public car park. A substantial part of the site from Water Row to the rear of the Old Govan Church (a listed building) is enclosed with no public access and partly occupied by

vehicles.

2. The Central Govan Tenants and Residents Association welcomes the proposal but would object to a development that occupied all of the current public space along the river front and blocked views across the river. The association wishes the tarmacadam area and the area between it and the river to be retained on the grounds of amenity and developing the potential tourist attraction for Govan's town centre and heritage. Other representations refer to Govan's heritage and seek changes to the proposal. The Govan Reminiscence Group seeks provision for public civic space that reflects and highlights the historic importance of Water Row. A "Doomster Hill Park" is sought to provide a vista to the river from the town centre.

3. The site is crossed by the Clyde Walkway, which is designated as an aspirational Core Path in the council's Core Paths Plan. It is also located within the Govan Cross Conservation Area and within the Govan Cross Townscape Heritage Initiative. Although the council states that the loss of views are not a planning related matter, public views across the river to local landmarks can contribute to local identity and sense of place. The car parking area currently allows open views across the river from near the former ferry terminal to the Maritime Museum and tall ship. I agree that retaining some of the site as open space and keeping a view of the river from the town would be desirable.

4. Any proposed development will have to preserve or enhance the character or appearance of the conservation area and the setting of the listed Pearce Institute building and Old Church. The council has advised that no planning application has been received for the site and its future use has yet to be considered. This is an important site at the centre of Govan that would benefit from community involvement in its future development.

5. If a planning application is received I would expect the council to consult local residents and relevant organisations in accordance with its normal development management procedures. That would provide an opportunity for interested parties to comment on the proposed scale, form, design and layout of development and its impact on the conservation area, setting of the listed buildings and heritage of Govan. Any proposal for over 50 housing units would also require pre-application consultation to be undertaken.

**Reporter's recommendations:**

No modifications.

Issue 22	Housing Proposal H009 Ronaldsay St/Liddesdale Sq	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55)	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Gary Flanagan (00053) Marina Costello (00403)		
Provision of the development plan to which the issue relates:	H009 Ronaldsay St/Liddesdale Sq is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 136 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00053 Gary Flanagan - Objection to housing proposal H009. The proposal will lead to noise pollution, anti-social behaviour, burglary and vandalism. The proposal would exacerbate public encroachment on private gardens.  00403 Marina Costello - Existing community areas in Milton, e.g. Milton Park, Liddesdale Square, play areas and the area to the rear of the shops at Skerray Street, are highlighted in the Plan as community/environmental uses to ensure continuity and appropriate maintenance.		
Modifications sought by those submitting representations:		
00053 Gary Flanagan - Proposal H009 - Ronaldsay St/Liddesdale Sq to be deleted as a housing proposal from the City Development Plan.  00403 Marina Costello - The City Development Plan should identify existing community areas in Milton as community/environmental/open spaces.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00053 Gary Flanagan - Proposal H009 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.  The points raised are not planning related matters and are dealt with by other Council		

services or external agencies and organisations.

No modifications recommended.

00403 Marina Costello - The Proposed Plan itself does not identify open spaces, but Policy CDP6 states that the plan will support the retention, as open space, of certain categories of open space shown on the Open Space Map, and listed on Figure 14 of the Plan. Policy CDP6 also indicates that these open space categories form some of the core elements and links in the Green Network, and that development that is likely to impact on the Green Network will be resisted unless it includes appropriate mitigation.

Regarding the sites specified by the objector:

- Milton park is identified as 'Park and Garden' on the Open Space Map and would be protected by policy CDP6.
- Skerray Street is identified as a 'site not affecting protected Open Space' on the Open Space Map. It is considered a brownfield site, being formerly occupied by housing prior to demolition. It would not be protected by policy CDP 6.
- Liddesdale Square is identified as amenity greenspace on the Open Space Map and would be protected by policy CDP6. It is also shown on the Policy and Proposals Map as forming part of the Housing Land Supply. This indicates that it is considered to have potential for housing. However, this doesn't necessarily mean that housing will be acceptable on the site. Any proposal would require to take account of the fact that this is protected open space and make provision for compensatory provision should development be considered acceptable on the site.

No modifications recommended.

### **Reporter's conclusions:**

1. The proposed addition to the housing land allocation comprises a large area of land at Ronaldsay Street and two smaller sites, including Liddesdale Square.

#### Effect on the living conditions of existing residents

2. I appreciate that the representation concerns an end of terrace family home where problems have been experienced with use of the garden as a footpath. However, it would be possible to restrict access by means such as boundary fencing, unless the route is a public right of way. It is submitted that the development would create noise pollution, anti-social behaviour, burglary and vandalism. The character of the site would change if the vacant land was developed for housing. However, I have no detailed evidence before me to suggest that significant social problems would necessarily arise.

#### Need for housing

3. At Issue 17 we have found that there will be a shortfall in the housing land supply. Site H009 is capable of helping to meet the housing land shortfall towards the end on the Proposed Plan period.

4. Pre-application consultations would be necessary if a development of over 50 dwellings is proposed. If a planning application was submitted the council could consult the police architectural liaison officer on the proposed scheme so that it could be

designed to minimise any opportunities for crime. Local residents would have the opportunity to comment further on any matters in accordance with the council's consultation procedures for planning applications.

#### Community initiatives/open space

5. The representation on behalf of Love Milton and North Glasgow Community Food Initiative seeks that existing community areas are highlighted in the plan, including the central grassed Liddesdale Square. It advises that a small part of proposed housing area H009 is the subject of discussions with the council regarding a market garden as an extension to the community garden. The council has confirmed the areas that would be protected under policy CDP6: Greenbelt and Green Network of the Proposed Plan, include Liddesdale Square (amenity greenspace on the Open Space Map). It has advised that the inclusion of Liddesdale Square in H009 does not necessarily mean that it would have potential for housing.

6. Liddesdale Square is a well maintained grassed area with trees and a footpath. It contributes towards the sense of place for the community, being located between a parade of shops and a church and near the new memorial garden. I consider that this land should be retained as open space, with potential for enhancement in association with any housing development that takes place in the vicinity. However, Liddesdale Square should remain within site H009 so that it may be considered for any improvements and enhancement as part of any wider housing development. The use of any of the land comprising H009 as a market garden would be a matter for consideration at the planning application stage.

#### Areas of community interest outside H0009

7. Other areas of interest to the community are mentioned at Skerry Street and Milton Park. The council has confirmed that the land at Skerry Street is a site that forms part of the housing land supply. Any proposed community use would have to be assessed at the time of a planning application and associated public consultation. Milton Park is protected by policy CDP6: Greenbelt and Green Network of the Proposed Plan. How land is maintained in the future is a matter for the council/landowner rather than for the examination of the Proposed Plan.

#### **Reporter's recommendations:**

No modifications.

Issue 23	Housing Proposal H011 Standburn Rd/Wallacewell Rd	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55)	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Mr Griffin (00650) Stuart Darroch (00656)		
Provision of the development plan to which the issue relates:	H011 Standburn Rd/ Wallacewell Rd is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 218 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00650 Mr Griffin - Objection to housing proposal H011. The population increase associated with this proposal would exacerbate overcrowding in local schools, and increase traffic on already busy residential streets. Local wildlife would be damaged. Improvements to public transport and local amenities such as a sports centre should be prioritised over new housing.  00656 Stuart Darroch - Objection to housing proposal H011. The population increase associated with this proposal would exacerbate traffic capacity issues on already busy residential streets, with particular concerns over traffic around schools, and access for emergency vehicles. Local wildlife and habitat would be damaged, and valued local green space would be lost. The proposal could potentially affect the proposal to extend the local Nature Reserve. Removal of natural drainage and man-made solutions associated with housing development will see the return of flooding problems.		
Modifications sought by those submitting representations:		
00650 Mr Griffin, 00656 Stuart Darroch - Proposal H011 - Standburn Road/Wallacewell Road to be deleted as a housing proposal from the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00650 Mr Griffin, 00656 Stuart Darroch - Proposal H011 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.		



The site was included in the Housing Land Supply on the basis of a planning application submitted in 2007, but subsequently withdrawn in 2008. Prior to any further application being submitted, the applicant would require to undertake a pre-application consultation process with the local community. Issues such as traffic, parking, drainage, wildlife and biodiversity could be considered through this process, in compliance with City Development Plan Policy CDP 6: Green Belt and Green Network, Policy CDP 7: Natural Environment and associated Supplementary Guidance. With regards to school capacities and the provision of other community facilities, this would be dealt with by other Council Services. The provision of additional public transport services would be considered in relation to the requirements of Policy CDP 11: Sustainable Transport and associated Supplementary Guidance.

Any development of the site would have to take account of the proposed extension to the Local Nature Reserve. The area of the extension is shown on the Policy and Proposals Map, and specific mention of this proposal is made on Page 55 of Policy CDP 10.

No modifications recommended.

### **Reporter's conclusions:**

1. The site is an almost triangular area of land with residential areas to the east and west and open land to the south, including a Local Nature Reserve.

2. Both representations seek deletion of the proposed addition to the housing land supply. Issues raised include the loss of wildlife, including protected species, impact on the nature reserve, lack of capacity in local schools, busy traffic in residential areas, particularly at Wallacewell primary school dropping off and picking up times and potential road safety problems. In addition, they raise the need for amenities for existing residents such as a railway station, more regular bus routes and a sports centre, loss of green space used by dog walkers and families, loss of tranquillity and loss of trees. It is submitted that Robroyston is already at saturation point with traffic problems and lack of capacity. Drainage problems are referred to in parts of the nature reserve and green space with potential for flooding problems.

#### Housing land supply

3. At Issue 17 above we have identified that there is a shortfall in the housing land supply. Site H011 is required to help meet that shortfall in the Proposed Plan period.

#### Wildlife

4. The Proposed Plan indicates that the northern boundary of the local nature reserve would be extended. I would not expect any development to directly involve land within the extended local nature reserve. However, I see no reason why part of the reserve and its proposed extension is included within site H011. In view of the representations regarding wildlife within the remainder of site H011 I would anticipate that any planning proposal would be accompanied by an ecological survey report, including mitigation proposals as necessary. The site boundary should be modified to exclude the reserve as extended.

School capacity

5. In response to my request for further information the council has advised that the housing proposal falls within the catchment areas of two primary schools (one denominational and one non-denominational) and two secondary schools (one denominational and one non-denominational).

6. The council's projected school rolls to 2026, taking the proposed development into account indicate that St Catherine's Primary would have spare capacity. However, Wallacewell Primary School would be at over 80% capacity from 2016 to 2024 and then just over 100% capacity from 2025-2026. Smithycroft Secondary School would have spare capacity, but All Saints Secondary School would be over 80% capacity in 2025 and 2026.

7. The council has put forward a range of measures that it would consider where a capacity issue is identified. These include a review of catchment areas, internal configuration of existing buildings to increase capacity, modular accommodation, extensions and new builds. The measures applied would depend on the particular circumstances in the area.

8. In view of the council's response and measures that it could take I see no reason why sufficient education provision could not be planned for, and provided, if the site is developed.

Traffic

9. The council has advised that traffic, parking and other issues could be considered through the pre-application consultation process which is required for major developments of over 50 housing units. No fundamental problems with traffic generation or with the capacity of the surrounding road network have been brought to my attention by the council.

Transport and sports facilities

10. An additional 218 houses would provide additional people to support improved transport and sports facilities. However, whether facilities could be improved or provided prior to development of the site would depend upon the availability of financial support and the investment programmes of the authorities and organisations involved. The council has advised that the provision of additional public transport services would be considered in relation to the requirements of Proposed Plan Policy CDP11: Sustainable Transport and associated supplementary guidance.

Green space, tranquillity and trees

11. The council would need to consider the provision of open space as part of any housing development having regard to its standards and the context of open space provision within the wider area. Relevant considerations would be Policy CDP6: Green Belt and Green Network and Policy CDP7: Natural Environment, of the Proposed Plan and associated supplementary guidance. Development of the site would provide potential for replacement tree planting. Inevitably there would be a loss of tranquillity if the site was developed, but any such harm would be outweighed by the social and economic benefits from the additional housing.

**Flooding and drainage**

12. If the council considers it to be necessary, a flood risk assessment could be required as part of any planning application. The council would have to ensure that the site could be properly drained with no significant adverse effects for neighbouring properties or detrimental effect on the local nature reserve.

**Reporter's recommendations:**

Modify the Proposed Plan by omitting the area of the designated local nature reserve and the proposed extension to the reserve from housing proposal H011.

Issue 24	Housing Proposal H015 Govan Graving Docks, Govan Rd	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55)	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Iain McGillivray (00386) Daniel Clark (00438) Aileen Fenton (00498)		
Provision of the development plan to which the issue relates:	H015 Govan Graving Docks, Govan Rd is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 800 houses. It is proposed that 700 houses will be for sale and 100 houses will be affordable. All are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00386 Iain McGillivray - Objection to housing proposal H015 (Govan Graving Docks). There would be no wide benefit to Govan or to Glasgow from redevelopment of the site that would consist primarily of luxury apartments, especially when there is plenty of derelict land elsewhere of little historic interest that is opportune for such use. Any permanent new build on the site should be restricted to small commercial units. The site should be designated as a heritage conservation area enabling a shipbuilding/maritime heritage park to be created. The dry docks should be restored and protected from redevelopment in order to preserve the historic character of the site. The capacity of housing envisaged would likely necessitate the filling in of the dry docks and/or the basin. Furthermore the quays may not all have the load bearing capacity necessary to allow major construction on them without extensive excavation and reconstruction beyond what would be acceptable for a Grade-A listed site.  00438 Daniel Clark - Objection to proposal H015 for residential development. Any permanent new build on the site should be restricted to small commercial units on the quay between No.3 dry dock and Govan Road. The site should be designated as a heritage conservation area enabling a shipbuilding/maritime heritage park to be created. The dry docks should be restored to working order so that the water levels can be controlled and the pump house should be secured against further deterioration until it is renovated. This is a great opportunity to ensure that this area is available to be used as a public site. A public use for the site is more likely to boost commerce in the local community than upmarket housing.  00498 Aileen Fenton - Objection to housing proposal H015 on the basis that the development would have a negative effect on neighbouring property values, and could be harmful to the amenity of neighbouring residents. The site would be put to better use as a shipbuilding heritage park.		

<b>Modifications sought by those submitting representations:</b>
00386 Iain McGillivray, 00438 Daniel Clark, 00498 Aileen Fenton - Proposal H015 - Govan Graving Docks, Govan Road to be deleted as a housing proposal from the City Development Plan.
<b>Summary of responses (including reasons) by planning authority:</b>
<p><u>Objecting</u></p> <p>00386 Iain McGillivray, 00438 Daniel Clark, 00498 Aileen Fenton - Proposal H015 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.</p> <p>The site was included in the Housing Land Supply on the basis of a 2005 planning application which has not been progressed. Should any further proposal for the site come forward, account would have to be taken of the Grade A listed structure and other relevant policies in the Plan. If considered to be a major application, pre-application consultation with the local community would be required, as well as neighbour notification for any application.</p> <p>The loss of views and property values are not planning related matters.</p> <p>No modifications recommended.</p>
<b>Reporter's conclusions:</b>
<ol style="list-style-type: none"> <li>1. Govan Graving Docks comprises three category A listed dry docks and a partly derelict pump house. They are located near to Glasgow Science Centre, the riverside museum, other recent developments next to the Clyde and the settlement of Govan. The site is mainly fenced off to prevent access because of its neglected condition.</li> <li>2. The docks are included on the Buildings at Risk Register for Scotland, where they are described as: <i>"being built for the Clyde Navigation Trust during the years when the Clyde yards led the world in the building of sophisticated merchant ships, so the complex is of architectural/historic interest in an international context, of major significance in terms of the history of the world shipbuilding. Docks Nos 1 and 3 were each the deepest in Britain when built and could take the largest ships afloat"</i>.</li> <li>3. Representations seek deletion of the housing proposal, disallowing infilling of the docks and restricting the amount of new build to small commercial units. The impact of any development on the outlook from houses along Napier Drive would be a matter to be considered at the planning application stage when the type and layout of development would be available for public comment. However, loss of property values from development is not a material consideration that can be given any weight.</li> <li>4. The council's urban capacity study (2013) indicates that housing development could</li> </ol>

produce 800 dwelling units, but only commencing from 2024 near the end of the Proposed Plan period.

5. Clearly the category A listed status of the docks is a significant material consideration that would have to be taken into account by the council when assessing any planning application for development. Pre-application consultation with the local community would be required if a major development (over 50 houses) is proposed. The type and scale of development and its impact on the heritage asset are matters that the council will need to assess in consultation with Historic Environment Scotland, together with local residents and heritage interest groups. Any proposal would have to satisfy the requirements of Policy CDP9 – Historic Environment (as amended by this examination report) and the associated supplementary guidance.

6. I consider that the site should be carried forward as part of the housing land supply at present, but in view of the community interest, the listed status of the docks and lack of firm or immediate proposals, its future use should be re-assessed in the next review of the development plan.

**Reporter's recommendations:**

No modifications.

Issue 25	Housing Proposal H016 Dungeonhill Rd/Netherhouse Rd	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55)	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Steven Walters (00115) Stewart McGleish (00049)		
Provision of the development plan to which the issue relates:	H016 Dungeonhill Rd/Netherhouse Rd is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 125 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00115 Steven Walters - Objection to housing proposal H016 on the basis that the green belt should not be developed for housing when there are numerous brownfield sites available. Existing residential amenity and wildlife will be adversely affected.  00049 Stewart McGleish - Objection to housing proposal H016 on the following basis:  The amenity of neighbouring residents would be negatively affected and there would be increased pressure on local social facilities. There are numerous council owned land sites within the existing settlement boundaries that would be more suitable in facilitating the building of both social and owner occupied houses. The proposed development would be to the financial advantage of the Council and building partners only. The site is green belt in nature and hosts an array of wildlife, which would be lost.		
Modifications sought by those submitting representations:		
00115 Steven Walters, 00049 Stewart McGleish - Proposal H016 - Dungeonhill Road/Netherhouse Road to be deleted as a housing proposal from the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00115 Steven Walters, 00049 Stewart McGleish - Proposal H016 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.		

The site was released from the green belt through the Strathclyde Structure Plan 1990. The principle of residential development on this site has therefore been established. No planning application has yet been submitted for the site. Any proposals would have to consider issues relating to the loss of privacy, site layout and protected wildlife.

The site is adjacent to one of the Proposed Masterplan Areas for Community Growth (Proposal H115). The masterplan areas have been identified as having potential for housing through a City-wide green belt review. Should a housing proposal for H115 be developed through this masterplan approach, and given the status of H016 as previously released from the green belt, it would be anticipated that H116 would be incorporated within any proposal.

Loss of views, lack of social facilities and security are not relevant to this housing proposal. Should a planning application be submitted, it would need to take into consideration loss of privacy, or whether there was any evidence of protected wildlife that could be impacted upon.

Glasgow City Council had sent out notifications to local residents likely to be affected by the new proposal. For the avoidance of doubt the authority clearly identified the site by the inclusion of a location plan.

No modifications recommended.

#### **Reporter's conclusions:**

1. The site is located at the fringe of existing housing at Easterhouse. Although it is greenfield land it is not designated as green belt because that designation was removed when the Strathclyde Structure Plan was adopted in 1990. The eastern part of the site is gently sloping and overgrown. The southern part is sloping agricultural land and had been ploughed at the time of my site inspection.
2. In terms of consultation on the Proposed Plan, there was a belief locally that the proposal was for the old Commonhead Primary School site. However, the council has indicated that the notification to local residents identified the site on an accompanying location plan.
3. I appreciate that housing development would change the character of the land. However, we have concluded at Issue 17 above that there will be a shortfall in the housing land supply. This shortage in the supply of housing land over the Proposed Plan period cannot be met solely by the development of derelict sites or other brownfield land, including council owned sites. Site H016 would contribute towards the shortfall in housing land within the Proposed Plan area. It is located next to site H115 which is an extensive area in the green belt proposed as a Community Growth Area Masterplan. The Masterplan for the proposed Seven Lochs Wetland Park acknowledges these proposed development areas.
4. The matters raised in representations include the effect on the outlook from existing properties, privacy, the road layout and impact of traffic, impact on infrastructure and social facilities, security and effect on wildlife. These matters would be assessed in detail at the planning application stage. I would expect the council to require an ecological survey as part of any application. The effect of any future development on the value of any existing houses is not a material consideration that can be given any weight when



considering allocation of the land in a proposed development plan.

5. The council has advised that a pre-application consultation process would be required with the local community if a major development (greater than 50 dwellings) is proposed. The objective is for communities to be better informed about major development proposals and to have an opportunity to contribute their views before a formal planning application is submitted. I would also expect the council to consult local residents on any application as part of its normal development management procedures. This would allow further representations on matters of concern to adjacent residents to be made at that time on a specific proposal including details of the housing layout and design.

6. The council has advised that an application in principle for 49 houses was submitted in June 2015.

**Reporter's recommendations:**

No modifications.

Issue 26	Housing Proposal H023 Sanda St/Kelbourne St/Clouston St	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55)	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>Neil Wallace (00002) North Kelvin Meadow (00004) North Kelvin Community Council (00005) Merle Read (00007) Blythe Tinker (00008) Susie Abrahams (00009) Rhian Williams (00010) Alex Benchimol (00011) Carol Webster (00012) Stefan Ward (00013) Remco De Blaaij (00014) The Conservation Volunteers (00015) Hugh Matthews (00017) Peter Lorenz (00018) Kenny Harvey (00019) Glasgow West End (00021) Hannah Baxter (00022) Sarah McMillan (00023) Fiona Rintoul (00029) Jane Gordon (00042) Margaret McKean (00044) Ian McKean (00045) Tobi Watson (00047) Victoria Rushworth (00059) William V Nicholson (00060) John Philip Nicholson (00061) Ann J Nicholson (00062) Anthony Sayer (00065) Brian Condon (00069) Alex Lloyd Young (00094) Kirsteen MacDonald (00095) Gordon Fisher (00096) Jane Williams (00101) William J Robertson (00104) Andre Boeckmann (00108) Brenda Irons-Roberts (00110) Martin Irons-Roberts (00111) Calum Fisher (00112) Joyce Macfarlane (00116) Amy Ritchie (00117) Leigh De Oliveira (00118) Jessica Wolfson (00119) Charlotte Gross (00120) Paul Andrew Murphy (00121)</p>	<p>Fiona Murphy (00399) Jennifer Roberts (00400) Kate Black (00407) D Donaldson (00414) Nicola Smith (00416) Liza Dimbleby (00421) Brian Young (00423) Duncan Taylor (00430) A J Nairn &amp; C S Nairn (00431) Keith Macpherson (00434) Elspeth Singleton (00435) Erin Despard (00436) Ali Jarvis (00447) Dominic Gonzalez (00448) Geoff Gallagher-Mackay (00454) Elizabeth Rawes (00459) Arran James (00461) Riikka Gonzalez (00462) Caroline Bingley (00464) Allan Brown (00465) Hector MacAlister (00466) Sapna Agarwal (00467) Emma Schad (00469) Rosie Simpson (00470) Quintin I Cutts (00471) Emily Cutts (00472) Alison MacGregor (00473) Kristin Mojsiewicz (00480) Nicolas White (00481) Sam Rex-Edwards (00482) Claire Slocombe (00487) David Armstrong (00488) Camille Young (00492) Beth Liddle (00494) Marilyn Young (00495) Carole Milligan (00499) Charlotta Gorski (00502) Priya Logan (00504) Jayson Byles (00505) Alexander Kovalenkov and Ekaterina Tsibarova (00506) Julia MacPherson (00508) Martin Vincent (00509) Teresa Lowe (00510)</p>	

<p>Juliet S Duncan (00122)  Euan Duncan (00123)  Nahoum Anthony (00124)  Eithan Anthony (00125)  Stephanie Anthony (00126)  Joni Mackay (00127)  Marta Moskal (00128)  John Carruthers (00129)  Tanja Carruthers (00130)  Ariki Porteous (00131)  Kathryn Porteous (00132)  John Donaldson (00133)  Gemma Elise Gerber (00134)  Lindsay Bannerman (00135)  John Sutton (00136)  Kevin Dallas (00137)  Sheena Thompson (00138)  Axel Anthony (00140)  Kate Verrall (00141)  Ray Verrall (00142)  Fiona Douglas (00145)  Lynda Douglas (00146)  Gillian Keith (00147)  I Robertson (00148)  Beth Simpson (00156)  Hazel Fisher (00161)  Ross Downie (00162)  Christopher Bond (00325)  Stefanie Scott (00368)  Christine Salaun (00369)  Bridget Fowler (00370)  Keith Marshall (00372)  Julia Boswell (00373)  Bryony Murray (00374)  Anne Whitaker (00375)  Felicity Parsons (00376)  Jeannette Best (00377)  Neil McLaughlin (00383)  Eva Baillie (00387)  Rachel McAllister (00389)  Anna Fisk (00390)  Daisy Richardson (00393)  Ima Jackson (00394)  Margaret Despard (00395)  Kathryn Elmer (00398)</p>	<p>John James McGrory (00521)  Kirsteen Lee Scott (00524)  Catherine Forde (00525)  Gavin Crosby (00531)  Diana Morton (00532)  Jennifer Curran (00534)  Anthony Coia (00536)  Kathy Silver (00537)  Damian Jackman (00539)  Shona Cameron (00540)  Deborah Dewar (00542)  Christopher Booth (00543)  Paul Bassett (00548)  Gaynor Astbury (00551)  John Wynne (00552)  Annabel Wright (00553)  Lucy Black (00555)  Steve Greenland (00562)  Liam Watson (00569)  Jan Colquhoun (00572)  Marianne Paul (00582)  J Shearer (00583)  Anita Clark (00586)  Brett Collins (00591)  Danny Thallon (00596)  Christine Lee (00603)  Richard S Durk (00605)  Paula Fraser (00606)  Grant Campbell (00607)  Margaret Green (00612)  Ralph Green (00618)  Ian Black (00619)  Leslie Black (00624)  Robin Black (00625)  Angela Blair (00638)  Robert Ballantyne (00639)  Neil and Anna Paterson (00646)  Peter Barry (00653)  Christy Mearns (00657)  Don MacKeen (00658)  North Kelvin Meadow Campaign Group (00659)  Richard Young (00660)  Michael Adamson (00670)  Lea Cramsie (00671)  Maureen McNeill (00672)</p>
<p><b>Provision of the development plan to which the issue relates:</b></p>	<p>H023 Sanda St/Kelbourne St/Clouston St is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 100 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.</p>

**Planning authority's summary of the representation(s):**General Representations to ProposalObjecting

00132, 00140 - Object to the area identified as H023 being designated for housing

Supporting

00543 - Support for re-development of site as it has fallen into disrepair, there is a need for housing in the area and there is adequate green space elsewhere. The capital receipt from sale of site could be re-invested in creating a sports centre at Maryhill Road/Queen Margaret Drive

Scottish Planning PolicyObjecting

00002, 00004, 00007, 00008, 00009, 00010, 00011, 00014, 00015, 00017, 00019, 00021, 00023, 00045, 00047, 00059, 00069, 00094, 00095, 00101, 00110, 00111, 00112, 00116, 00120, 00121, 00122, 00123, 00127, 00129, 00130, 00131, 00133, 00135, 00137, 00138, 00142, 00145, 00147, 00161, 00162, 00325, 00369, 00372, 00373, 00374, 00375, 00377, 00387, 00389, 00393, 00398, 00400, 00407, 00414, 00416, 00421, 00430, 00434, 00435, 00436, 00447, 00448, 00454, 00459, 00461, 00462, 00464, 00465, 00466, 00467, 00470, 00473, 00480, 00481, 00482, 00487, 00494, 00502, 00504, 00505, 00506, 00508, 00509, 00510, 00521, 00524, 00525, 00532, 00534, 00536, 00539, 00540, 00542, 00548, 00551, 00552, 00553, 00555, 00572, 00583, 00586, 00596, 00605, 00606, 00607, 00612, 00618, 00619, 00624, 00625, 00638, 00639, 00646, 00658, 00659, 00660, 00670, 00671

Scottish Planning Policy recommends that sites which are identified in the open space audit and strategy as valued and functional open space (or are capable of being brought back into functional use to meet an identified need) should be identified on the open space map and protected by the Local Development Plan. Approval from Scottish Ministers would be required if the Council wished to dispose of land in use as a common or open space, or held for allotments.

Scottish Planning Policy on Consultation recommends that Planning should focus on positive placemaking, fostering adaptability by integrating a mix of compatible uses and communities, and thereby improving community cohesion.

Strategic Development Plan/Housing Land SupplyObjecting

00002, 00004, 00008, 00009, 00010, 00011, 00012, 00014, 00015, 00017, 00019, 00021, 00023, 00045, 00047, 00060, 00061, 00095, 00101, 00110, 00111, 00112, 00116, 00120, 00121, 00122, 00123, 00127, 00129, 00130, 00133, 00135, 00137, 00138, 00142, 00145, 00147, 00148, 00161, 00162, 00325, 00369, 00373, 00374, 00375, 00377, 00387, 00389, 00393, 00398, 00407, 00414, 00416, 00421, 00430, 00434, 00435, 00436, 00447, 00448, 00459, 00461, 00462, 00464, 00465, 00466,

00467, 00469, 00470, 00473, 00480, 00481, 00482, 00487, 00488, 00492, 00494, 00495, 00499, 00502, 00504, 00505, 00506, 00508, 00509, 00510, 00521, 00524, 00525, 00531, 00532, 00534, 00536, 00539, 00540, 00542, 00548, 00551, 00552, 00553, 00555, 00572, 00583, 00586, 00596, 00606, 00607, 00612, 00618, 00619, 00624, 00625, 00639, 00646, 00658, 00659, 00660

The Main Issues Report noted the SDP Proposed Plan conclusion that there was more than enough land supply to meet demand. The site has never been allocated for housing before. It was not included as a proposal in City Plan 2, so cannot be carried forward into the Local Development Plan. Inclusion in the 2012 land supply is not an adequate justification for its allocation as a proposal in the Local Development Plan. The Local Development Plan should accord with the Strategic Development Plan, which expresses a preference for the development of brownfield land.

### Sustainable Spatial Strategy/Council Policy and Strategies

#### Objecting

00002, 00004, 00007, 00008, 00009, 00010, 00011, 00012, 00014, 00015, 00017, 00018, 00019, 00021, 00022, 00023, 00029, 00042, 00044, 00045, 00047, 00060, 00061, 00062, 00065, 00069, 00095, 00096, 00101, 00108, 00110, 00111, 00112, 00116, 00120, 00121, 00122, 00123, 00127, 00129, 00130, 00133, 00135, 00137, 00138, 00142, 00147, 00148, 00161, 00162, 00325, 00369, 00370, 00372, 00373, 00374, 00375, 00377, 00387, 00389, 00393, 00394, 00398, 00399, 00407, 00414, 00416, 00421, 00430, 00434, 00435, 00436, 00448, 00454, 00459, 00461, 00462, 00464, 00465, 00466, 00467, 00470, 00473, 00480, 00481, 00482, 00487, 00488, 00492, 00494, 00502, 00504, 00505, 00506, 00508, 00509, 00510, 00521, 00524, 00525, 00531, 00532, 00534, 00536, 00539, 00540, 00542, 00548, 00551, 00552, 00553, 00555, 00562, 00572, 00583, 00586, 00596, 00603, 00606, 00607, 00612, 00618, 00619, 00624, 00625, 00638, 00639, 00646, 00657, 00658, 00659, 00660, 00672

The site is greenfield, has never been built on, and development is therefore contrary to the CDP Sustainable Spatial Strategy's preference for brownfield sites. There is no shortage of brownfield sites within the area. Although alternative pitch provision is proposed at Queen Margaret Drive, there would be an overall loss of open space in the area. Development would be contrary to open space policy, and the Council's Sports Pitch Strategy, which notes that pitches can also be used for informal recreation, and that consultation is required before pitches can be disposed of.

Development of this site would be contrary to the Council's green objectives, as demonstrated in its designation of Green Year in 2015, and would be contrary to policy for the historic environment.

#### Affordability

#### Objecting

00004, 00010, 00011, 00325, 00370, 00373, 00389, 00488, 00606, 00658 - The proposed housing is at the high end of affordability in this area. There is a greater need for affordable housing.

Road Traffic/Parking/Infrastructure

Objecting

00004, 00007, 00013, 00022, 00029, 00045, 00059, 00110, 00111, 00325, 00368, 00369, 00373, 00389, 00394, 00398, 00399, 00414, 00434, 00435, 00447, 00462, 00472, 00488, 00492, 00506, 00510, 00521, 00524, 00525, 00540, 00551, 00582, 00583, 00591, 00603, 00605, 00638, 00646, 00672 - Development would cause increased traffic, pollution and parking problems, in an area already suffering from this issue due to the density of the existing housing.

A lot of development (including conversion to residential and multiple occupancy) has taken place in the area without additional investment in recreational and roads infrastructure. Drainage infrastructure is also inadequate. There is no need for further housing.

Previous Planning History

Objecting

00004, 00010, 00011, 00042, 00059, 00325, 00369, 00373, 00407, 00430, 00466, 00488, 00506, 00548, 00551, 00555, 00606, 00607, 00639, 00658, 00660 - Planning permission was previously rejected by a Scottish Office Reporter in 1996.

Conservation Area

Objecting

00002, 00007, 00012, 00014, 00015, 00018, 00019, 00021, 00023, 00045, 00060, 00061, 00062, 00095, 00110, 00123, 00325, 00369, 00373, 00374, 00375, 00377, 00393, 00398, 00407, 00416, 00434, 00448, 00454, 00459, 00462, 00464, 00465, 00467, 00482, 00487, 00488, 00492, 00494, 00502, 00504, 00505, 00506, 00508, 00548, 00551, 00553, 00555, 00582, 00605, 00607, 00612, 00618, 00619, 00624, 00625, 00638, 00639, 00657, 00658, 00660

The site is within a Conservation Area, meaning that the quality of design will be an important consideration. Tree preservation orders (including those protecting the lime trees along Clouston Street) would be violated. Development would change the character of the area.

Impact on Listed Buildings

Objecting

00657 - The impact of the development on listed buildings bordering the site has not been assessed.

Use of Site

Objecting

00002, 00005, 00007, 00008, 00009, 00010, 00011, 00012, 00013, 00014, 00015,

00017, 00018, 00019, 00021, 00022, 00023, 00029, 00042, 00044, 00045, 00047, 00059, 00060, 00061, 00062, 00065, 00069, 00095, 00101, 00104, 00108, 00110, 00111, 00112, 00116, 00117, 00118, 00119, 00121, 00122, 00123, 00124, 00125, 00126, 00127, 00128, 00130, 00136, 00138, 00141, 00142, 00145, 00146, 00147, 00148, 00156, 00161, 00325, 00368, 00369, 00373, 00374, 00375, 00376, 00377, 00383, 00387, 00389, 00390, 00393, 00395, 00398, 00399, 00400, 00407, 00416, 00421, 00430, 00434, 00435, 00436, 00447, 00448, 00454, 00459, 00461, 00462, 00464, 00465, 00466, 00467, 00469, 00470, 00472, 00473, 00480, 00481, 00482, 00487, 00488, 00492, 00494, 00495, 00499, 00502, 00504, 00505, 00506, 00508, 00509, 00510, 00521, 00524, 00525, 00532, 00534, 00536, 00537, 00539, 00540, 00542, 00548, 00551, 00552, 00553, 00555, 00562, 00569, 00572, 00582, 00583, 00586, 00591, 00596, 00603, 00605, 00606, 00607, 00612, 00618, 00619, 00624, 00625, 00638, 00639, 00646, 00653, 00657, 00658, 00659, 00660, 00670, 00671, 00672

Following a long period of neglect by the Council, the site has benefited from significant investment by the community, and is currently used for a range of community activities, including: nature education for children, allotments, jogging, dog walking, informal outdoor play, local events. Links with local schools and nurseries have also been developed through use of the site. The site is highly valued to visitors and people from other areas, contributes to a safer and more cohesive community, and could be a resource to the area in the long term. These activities are consistent with the Council's objectives on access to open space, educational, cultural and leisure pursuits, and local food production, and contribute to addressing ill health, obesity and deprivation. Availability of allotments has reduced over time, leading to a waiting list of 8 years in the local area.

#### Biodiversity/Natural Environment

##### Objecting

00002, 00010, 00011, 00012, 00014, 00015, 00017, 00018, 00021, 00022, 00023, 00029, 00042, 00045, 00047, 00060, 00061, 00108, 00112, 00118, 00142, 00145, 00156, 00325, 00369, 00373, 00374, 00375, 00377, 00389, 00393, 00400, 00407, 00416, 00421, 00434, 00435, 00436, 00448, 00461, 00462, 00464, 00465, 00466, 00467, 00469, 00470, 00482, 00487, 00494, 00502, 00504, 00505, 00506, 00508, 00509, 00510, 00521, 00524, 00525, 00534, 00539, 00553, 00555, 00572, 00582, 00583, 00586, 00591, 00606, 00607, 00612, 00618, 00619, 00624, 00625, 00639, 00653, 00657, 00658, 00659, 00660

The site is a wild, natural, green place, and has won numerous environmental awards. It is the last in this area that is not a formal park or garden, and connects logically to the River Kelvin green corridor, which is of high environmental value. The site is home to 500 trees and various wildlife species. It is part of a green network of spaces in the West End which provides stepping stones for migratory species. Development would result in the loss of around 1.4 hectares of green space, impact on the biodiversity of the area, and would therefore be contrary to the aims of the CDP in relation to the natural environment. As this is a tenemental area, most people don't have gardens.

##### Flooding

##### Objecting

00004, 00010, 00011, 00012, 00014, 00015, 00018, 00019, 00021, 00022, 00023,

00111, 00325, 00369, 00373, 00374, 00375, 00393, 00400, 00407, 00414, 00421, 00430, 00434, 00435, 00464, 00467, 00470, 00472, 00482, 00487, 00494, 00502, 00504, 00505, 00506, 00508, 00509, 00534, 00536, 00553, 00555, 00605, 00607, 00612, 00618, 00619, 00624, 00625, 00639, 00658, 00660 - The site performs a flood protection function for the area, which has suffered flooding issues in the past. When added to other development that has taken place in the area, further housing would exacerbate this problem.

#### Consultation

#### Objecting

00004, 00005, 00007, 00010, 00011, 00012, 00014, 00015, 00018, 00019, 00021, 00022, 00023, 00029, 00060, 00061, 00062, 00095, 00110, 00112, 00325, 00369, 00373, 00374, 00375, 00390, 00393, 00394, 00398, 00399, 00407, 00414, 00416, 00421, 00434, 00435, 00448, 00454, 00464, 00465, 00467, 00470, 00472, 00480, 00481, 00482, 00487, 00488, 00494, 00502, 00504, 00505, 00506, 00510, 00521, 00524, 00525, 00553, 00555, 00562, 00572, 00582, 00605, 00612, 00618, 00619, 00624, 00625, 00638, 00639, 00653, 00658, 00659, 00670, 00672

Consultation in relation to the proposed development has been limited to the design of the development, and has been inadequate. It has not taken account of the views of the local community and representative groups, who objected at Main Issues Report stage, and remain overwhelmingly opposed. The numerous schemes that have been proposed over the years mean that the ability of the community to move forward with the site has been put on hold for some time.

#### Inequality

#### Objecting

00012, 00014, 00015, 00019, 00021, 00112, 00370, 00374, 00387, 00393, 00398, 00416, 00434, 00464, 00467, 00469, 00470, 00472, 00487, 00494, 00502, 00504, 00505, 00508, 00509, 00510, 00521, 00524, 00525, 00534, 00542, 00553, 00612, 00618, 00619, 00624, 00625 - This is an area of deep inequality. The woods are used by everyone. Development of the site would affect the poorest most.

#### Sustainability

#### Objecting

00012, 00014, 00015, 00019, 00021, 00022, 00111, 00112, 00373, 00374, 00375, 00390, 00393, 00398, 00414, 00434, 00464, 00467, 00469, 00470, 00482, 00487, 00492, 00494, 00502, 00504, 00505, 00508, 00509, 00553, 00612, 00618, 00619, 00624, 00625

The land is a sustainable resource for the community, though the food growing that it encourages. The site is a green space within walking distance of the community, meeting the objectives of the Good Places Better Health for Scottish Children strategy. Existing services cannot support further development in this area. It is also a carbon sink.



<p><u>Education, Health and Well-being</u></p> <p><u>Objecting</u></p> <p>00095, 00124, 00142, 00372, 00373, 00374, 00375, 00389, 00390, 00393, 00398, 00407, 00414, 00416, 00421, 00434, 00435, 00436, 00448, 00454, 00459, 00461, 00462, 00464, 00465, 00466, 00467, 00470, 00472, 00480, 00481, 00482, 00487, 00492, 00494, 00502, 00504, 00505, 00506, 00508, 00509, 00510, 00521, 00524, 00525, 00534, 00536, 00539, 00542, 00552, 00553, 00572, 00582, 00583, 00591, 00606, 00612, 00618, 00619, 00624, 00625, 00639, 00653, 00657, 00658, 00659, 00660, 00672</p> <p>The provision of parent-led activities on this space promotes education, and the importance of exercise to health and well-being for the community and its children.</p> <p><u>Legacy</u></p> <p><u>Objecting</u></p> <p>00111 - The community aims to protect this space for the benefit of future generations.</p> <p><u>Profit Motive for Development</u></p> <p><u>Objecting</u></p> <p>00133, 00569 - The main justification for development of housing on this site is profit.</p>
<b>Modifications sought by those submitting representations:</b>
<p>All above objections:</p> <ol style="list-style-type: none"> <li>1. Delete housing proposal H023 Sanda St/Kelbourne St/Clouston St from Policy and Proposals Map.</li> <li>2. Amend Glasgow Open Space map to show site as Natural/Semi-Natural Greenspace or permanent Green Space</li> </ol>
<b>Summary of responses (including reasons) by planning authority:</b>
<p><u>Objecting</u></p> <p>All above objections:</p> <p>The site is the former Garrioch Secondary School playing fields, and comprises red blaes pitches. It was declared surplus by the former Strathclyde Regional Council in February 1995 and marketed later that year. Miller Homes (the successful bidder) submitted a planning application for housing in 1996 (Ref 06/01610/DC) which was refused by Committee due to the lack of provision of alternative sports facilities. This decision was upheld at a subsequent appeal. The reason for refusal has been addressed in discussions with sportscotland in relation to subsequent proposals for the site.</p> <p>The site was acquired by Glasgow City Council following local government re-</p>

organisation in 1996, and re-marketed in 2002. Queens Cross Workspace entered into a development agreement with the Council in 2002, and again in 2005. A planning application was submitted by Queens Cross Workspace (Ref 06/01610/DC) for the erection of 95 flats and new sports park facility comprising multi-purpose games courts, jogging track, sports pavilion and lighting columns. This application was withdrawn on the basis that the predicted noise levels breached recognised limits due to the proximity of the proposed sports facility to housing.

In April 2007, the Council's Executive Committee approved the Sports Pitch Strategy Policy and Implementation Plan. In November 2007, the first stage of implementing the Pitch Strategy was approved by the Executive Committee. The report recommended that the receipt from the sale of the Clouston Street site would be allocated to the upgrading of the existing North Kelvinside pitches. This decision was made after consultation and agreement with sportscotland, in compliance with the requirements of Scottish Planning Policy.

As Queens Cross Workspace were not able to progress their proposal, the site was re-marketed in January 2008 in The Herald as a prime residential site for around 100 homes for sale. The Stage 2 Development Brief issued in January 2008 (OC14) provides the relevant detail. New City Vision were appointed as the preferred developer, and subsequently submitted a Pre Application Notice (Ref 10/02988/DC) in 2010, followed by an application for full planning permission in 2012 (Ref 12/00924/DC). The latter application will be taken to Committee in due course.

Statutory consultation on the various proposals that have been put forward has been undertaken, and any comments have been taken into consideration in reaching any decision.

The CDP Main Issues Report (CE8, paragraph 2.9) referred to the SDP conclusion that there was more than enough land for housing to meet demand. It should be noted that the CDP explains that this position has changed, and that there was therefore a requirement to identify additional sites.

The site has been continuously included in the housing land supply since 1995, when it was first marketed, and has been continuously effective since 2007. This demonstrates the Council's view that the site has been a housing opportunity for a significant period of time prior to its temporary occupation.

The site contributes towards the provision of an effective supply of land for housing, in compliance with Scottish Government policy.

The inclusion of the site in the City Development Plan is consistent with Circular 6/2013 (CE11, paragraph 78), which requires authorities to set out any opportunities for development in the Proposed Plan. This was not a requirement for City Plan 2.

It is important to consider, therefore, that this site was included in the supply which fed into the Housing Need and Demand Assessment undertaken for the SDP, and was therefore taken into account in reaching the conclusion set out in the Main Issues Report. PAN 65 (CE4) indicates that local authorities should undertake an audit of open space in their area, and prepare an open space strategy. This site is identified as "Category 97: Housing Land Supply containing possible protected open space". All sites that are included in the land supply are identified in this way to reflect their potential for housing.

The requirement to protect open space remains, however, and means that proposals for development must be considered against the relevant policies of the development plan.

It should be noted that the site is open space, not greenfield. The Strategic Development Plan definition of greenfield land states “land which has never previously been developed, or fully restored formerly derelict land which has been brought back into active or beneficial use for agriculture, forestry, environmental purposes or outdoor recreation” (CE6).

The land was previously in use for sports pitches, and cannot therefore be described as “never previously been developed”. It has been on the Vacant and Derelict Land register since 1995, when it was declared surplus. Although temporarily occupied, it has not been fully restored, as it remains a housing opportunity for the Council.

The site is identified in City Plan 2 as being within a DEV 2: Residential Development Policy Principle area. This designation encompasses the city’s residential areas, and also includes local green spaces. It requires the assessment of proposals against the terms of Policy ENV 1: Open Space Protection.

In summary, the Policy offers “a strong presumption in favour of the retention of all public and private green/open space” and identifies the categories of open space that fall within this designation. As this site was former playing fields, it would be categorised as a sports area.

The policy also sets out a series of criteria that should be considered when exceptions to this policy are considered. The first of these states

“Where exception is made for development on open space within categories 1 to 6, the development should:

- Either be directly related to the current use(s) of the open space or better serve local community needs by the provision, in the local area, of an area of equivalent, or higher quality open space, to directly replace the type of open space that would be lost (this will require the developer to consult with the local community using consultation methods agreed by the Council.”

The applicant (New City Vision) undertook a pre-application consultation with community groups and interested parties as part of the Pre Application Notification (PAN) process. As noted previously, the commitment by the Council to allocate the receipt from the sale of this site is acceptable to sportscotland, and is therefore considered to satisfy the requirements of Policy ENV 1.

The Council’s Legal Services advise that the site was occupied by the North Kelvin Meadow Green Space Initiative before June 2009. The group subsequently created a temporary community open space. This was without the permission of the Council. Although discussions did take place regarding the temporary occupation of the site in advance of development, no agreement was concluded between the group and the Council. The Council obtained a court order in September 2009 to remove the group from the site. Although this order has not been enforced to date, it remains the intention of the Council to provide the developers access to the site to build housing at an appropriate time.

The proposal is for housing for sale, rather than affordable housing. The tenure of any proposed housing is not a matter for the City Development Plan.

Issues relating to parking, traffic, pollution, flooding, impact on trees, listed buildings and the conservation area will be addressed through the planning application process.

The profit that would be made by any developer is not a planning matter.

No modifications recommended.

### Supporting

00543 - Comment of support noted.

### **Reporter's conclusions:**

1. Proposed addition to the housing land supply site H023 is located near the River Kelvin in the west end of the city. The surrounding development is mainly good quality red stone tenement housing with a gridded street pattern. There is a primary school nearby at Hotspur Street.

2. The site comprises the former Garrioch Secondary School playing fields and red blaes pitches. It has generally re-vegetated with little sign of any former pitches or courts. There is open scrubland in the centre with mainly immature tree cover round the edges, but the 17 mature lime trees alongside the Clouston Street boundary are the subject of a Tree Preservation Order. There are well-defined footpath entry points and paths within the site. There is a small 'orchard' area where fruit trees have been planted. A children's play space has been constructed in Birch woodland. Raised vegetable beds and half barrel planters have also been placed within the site and there are composting facilities. Even in wet weather, when I conducted my site inspection, people were walking dogs and families were using the play space. The site is clearly an area that is valued and looked after by the local community. The majority of representations and a petition seek to retain the site as open greenspace for the community.

### History

3. The planning history of the site may be summarised as follows:

- declared surplus in February 1995 and marketed by Strathclyde Regional Council;
- Miller Homes successful bidder, housing application refused because of lack of alternative sports facilities. Decision upheld on appeal;
- acquired by Glasgow City Council after 1996 and marketed in 2002;
- development agreement with Queens Cross Workspace. Application for 95 flats and sports facilities withdrawn;
- November 2007 the council's executive committee, after consultation with sportscotland, determined that money from the sale of the site would go towards upgrading the existing North Kelvinside pitches;
- stage 2 development brief for around 100 homes for sale issued in Jan 2008. New City Vision appointed as preferred developer. Pre-application notice in 2010, then full application in 2012 (12/00924/DC);
- site has been in housing land supply since 1995 and fed into the Strategic Development Plan;

- application ref: 15/01223/DC lodged by The Childrens Wood c/o Emily Cutts on 21 May 2015.

4. From the above it is clear that it has been the council's (and the former regional council's) intention since around 1995 that the former playing fields site be developed for housing. However, no planning permission was granted for residential development during that period – nor was the site allocated for housing purposes in the development plan (see paragraph 12 below). Indeed, the land at Clouston Street is shown as protected open space on the council's Open Space Map, albeit it is shown as Category 97 'a housing site affecting protected open space' on the key.

5. For the above reasons I do not consider that there is any planning commitment to the proposed residential development of the site. Instead the proposal to allocate the land for housing should be judged on its planning merits. The fact that the council has treated the site as a potential housing site in its housing land audit and housing land supply calculations does not change the planning status of the site.

6. It should be noted for completeness that there are two recent planning applications for the site:

- reference 15/01223/DC – use of site as community woodland and park (sui generis), granted subject to conditions on 26 January 2016;
- reference 12/00924/DC – residential development with associated car parking, landscaping and vehicular access, subject to a direction on 9 March 2016 referring the application for determination by Scottish Ministers.

#### Petition against housing development on the land

7. A petition has been submitted regarding the Childrens' Wood. A statement with the petition included the following points:

- the land has always been open space for educational and community use and should remain so;
- no suitable replacement can be offered for this unique, re-purposed wild space;
- the council's case is that, given the agreement on providing alternative sporting provision for the loss of the site, the Miller Homes rejection (on appeal) cannot be used in argument against housing on the land;
- the council claims consultation with sportscotland over the pitches but according to the council's own policy and strategy there should have been consultation with the local community which nobody can remember;
- according to the Sports Pitches Strategy the council is required to determine that the site is not required as part of any other open space function;
- refurbished pitches already available to the community cannot be considered to be a like-for-like replacement for a unique wild green educational and community space;
- the Inquiry Reporter for the 1996 Miller appeal stated "with increasing population the current proposal will remove a valuable community resource";
- since the inquiry additional building has taken place in the area with no open space compensation;
- in considering the drafting of the Proposed Plan in 2013-14 it would be impossible to consider the site as not being used for any open space function – awards won, regular use and events;

- now no sign of previous pitches, call on Reporter to re-designate the site as natural/semi-natural Green Space or Permanent Green Space;
- reject the view that some issues can be left to the planning process;
- council is still using argument of a proposed play area as compensation;
- PAN 65: Planning and Open Space emphasises that in preparing open space strategies which inform development plans the open space needs and desires of the local community must be established – but ignored in this case, and
- not random temporary efforts – continuous community engagement, self-funded, resulting in registered charities and their own planning application.

#### Housing land supply/affordability

8. Representations submit that there is sufficient housing in the area and that alternative brownfield sites are available as a preference to greenfield sites. However, at Issue 17 above we have concluded that there is a clear shortfall in the housing land supply for the Proposed Plan period. The land at Clouston Street has been identified by the council as being an effective housing site. Omitting the site as a housing allocation in the Proposed Plan would add further to the shortfall. This is a significant argument in favour of the proposed allocation.

9. Representations submit that there is a greater need for affordable housing. However, in the event that the land was allocated for housing, the housing mix for the site would be a matter to be determined when a planning application is under consideration and informed by housing need in the area. On a separate matter, whether or not a profit is made from a development is not a material planning consideration.

#### Open/green space policy

10. I accept that the site is open space, not greenfield which is defined as “*land which has never been previously developed, or fully restored derelict land which has been brought back into active or beneficial use for agriculture, forestry, environmental purposes or recreation.*”

11. Scottish Planning Policy (SPP) issued in 2014 indicates at paragraph 224 that: “*local development plans should identify and protect open space identified in the open space audit and strategy as valued and functional or capable of being brought into use to meet local needs*”. The site at Clouston Street is identified as open space on the Open Space Map, and as outlined in paragraphs 2 and 7 above it is plainly well used and highly valued as a facility meeting local needs.

12. In City Plan 2 the site is within a DEV 2: Residential and Supporting Uses Policy Principle Area. However, City Plan 2 Policy DEV2 is a general policy encompassing the main housing districts of the City, and not a specific policy applying to this particular site. Policy DEV2 of City Plan 2 is explicit that proposals impacting on green/open space should be assessed against the relevant policies (DEV11 and ENV1) which contain a strong presumption that all such public and private green/open space should be retained.

13. Similarly, (whilst the Proposed Plan proposes to allocate the land for housing development) Policy CDP6: Green Belt and Green Network of the Proposed Plan supports the retention, as open space, of the categories of open space specified and shown on Figure 14 (and identified on the council’s Open Space Map). Those categories include public parks and gardens, amenity space, playspace for children and teenagers,

allotments and other functional greenspace – all of which are provided in the protected open space at Clouston Street.

14. The council attaches great importance to open spaces in the City as part of the wider Green Network (page 43 of the Proposed Plan), and one of the key objectives of the Proposed Plan is to “ensure that people in existing communities have access to the open spaces they need” (page 23).

#### The value of the existing open space

15. I accept that the site at Clouston Street provides an important open space resource for the surrounding residents. It also performs a wider social and educational role resulting from community action, including the involvement of local schools and nature conservation education, allotments and food production, playspace and recreational activities, public health and community safety. I note that the activities, community projects and strategies have received support and awards.

16. The land forms a green space which contains numerous trees, many of which appear to be the result of natural regeneration, and provides a habitat which connects with the green corridor of the River Kelvin and is part of a network of green areas in this area of the City. It is likely that mature trees and a large amount of the emerging tree cover would have to be removed to accommodate a housing proposal of any significance. The loss of mature trees in this location could have an adverse effect on the established character and appearance of the Glasgow West Conservation Area where the site is situated.

17. Representations advise that the site is within an area of deep inequalities, with the meadow and wood used by everyone, and that many residents live in flats with little or no access to a garden. That indicates that the upgrade of sports pitches at North Kelvinside would not be satisfactory compensation for the potential loss of the community open space at Clouston Street; nor would it be possible to recreate the existing facility within a new housing development on the land.

#### Other issues

18. Whilst there are evidently car parking issues in the surrounding streets and the West End in general, I would expect that any new development on the site would require to cater within the site for its own parking needs.

19. Also I acknowledge that, in view of the size of the site, it should be possible to design a development of an appropriate layout, scale and massing that would preserve or enhance the setting of any surrounding listed buildings.

20. I agree with the council that any flooding issues could be addressed through the planning application process. SPP advises that the flood risk framework should be applied to development management decisions and that drainage assessments will be required for areas where drainage is already constrained or otherwise problematic, or if there would be off-site effects.

#### Overall conclusions

21. I recognise that the development of this site for housing would make a contribution

towards meeting the shortfall in the provision of land for new housing in the City, which we have identified as a deficiency in the Proposed Plan in Issue 17. However, the land at Clouston Street is a highly valued open space which is well used and maintained by the local community, and which should continue to be safeguarded for that purpose. Its development for housing would be in conflict with planning policies which seek to protect such areas. I have therefore decided to modify the Proposed Plan by deleting Housing Proposal H023.

22. Since the Proposed Plan does not designate open spaces I am unable to formally designate the site as an open space. It will be a matter for the council to reflect the outcome of this examination in its review of its Open Space Map, and in its Open Space Strategy (see Issue 6).

**Reporter's recommendations:**

Modify the Proposed Plan by deleting Housing Proposal H023.



Issue 28	Housing Proposal H031 South of Easterhill St	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55)	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Mr Stevens (00036) Alison Greer (00052) Allan Stevens (00058) James Muirhead (00072) Helen Porter (00073) William Beattie (00074) Catherine Anderson (00076) Heather Fraser (00077)		Edward Glover (00078) Patricia Anderson (00079) George Clark (00086) Evelyn MacDougall (00391) Michael Monaghan (00440) The Owner, Occupier or Lessee (00663) Robert McCreadie (00666)
Provision of the development plan to which the issue relates:	H031 South of Easterhill St is a site from the 2012 Housing Land Supply which provides for the construction of approximately 68 houses. It is proposed that all of these houses will be affordable, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00036 Mr Stevens - Objection to housing proposal H031 as this would result in the loss of valuable green space, currently enjoyed by local residents. This site is the last remaining green space in the locality and development would displace wildlife and destroy an area used for children's play and dog walking.  00052 Alison Greer - Objection to housing proposal H031 as this would result in the loss of valuable green space, currently enjoyed by local residents. The current use of the site aligns with the Central Scotland Green Network Themes - "A place to belong - creating an environment that people can enjoy and where they choose to live" and enhances the area and contributes towards an increased sense of wellbeing for local residents. Recent illegal felling of trees is of concern as it may serve as a precursor to development.  00058 Allan Stevens - Objection to housing proposal H031. There has been a lack of public consultation, which is a contravention of the Planning etc. (Scotland) Act 2006, which requires any developer proposing more than 50 houses to consult with the local community. The landowner has illegally felled trees without obtaining a license.  00072 James Muirhead - Objection to housing proposal H031 as this would result in the loss of valuable green space, currently enjoyed by local residents. Residential development would result in a loss of privacy and overshadowing in neighbouring properties. Recent illegal felling of trees is of concern as it may serve as a precursor to development.  00073 Helen Porter - Objection to housing proposal H031 as this would result in the loss of valuable green space, currently maintained and enjoyed by local residents.		

Development would displace wildlife and destroy an area used for children's play and dog walking. The current use of the site aligns with the Central Scotland Green Network Themes - "A place to belong - creating an environment that people can enjoy and where they choose to live" and enhances the area and contributes towards an increased sense of wellbeing for local residents. Recent illegal felling of trees is of concern as it may serve as a precursor to development.

00074 William Beattie - Objection to housing proposal H031 as this would result in the loss of valuable green space, currently enjoyed by local residents. Development would displace flora and fauna and destroy an area used for children's play and dog walking. Residential development would result in a loss of privacy and overshadowing in neighbouring properties, and would affect property values. The consultation process excluded many neighbouring properties.

00076 Catherine Anderson - Objection to housing proposal H031 as this would result in the loss of valuable green space, currently enjoyed by local residents. This is one of the few green spaces left in the locality. Development would displace flora and fauna, including protected wild orchids, and destroy an area used for children's play and walking.

00077 Heather Fraser - Objection to housing proposal H031 as this would result in the loss of valuable green space, currently maintained and enjoyed by local residents. Development would displace wildlife and destroy an area used for children's play and dog walking. The site falls within the Central Scotland Green Network and the current use aligns with the Central Scotland Green Network Themes - "A place for nature - creation of an environment where nature can flourish", "A place to belong - creating an environment that people can enjoy and where they choose to live" and "A place to feel good - an environment that supports healthy lifestyles and well being". The site enhances the area and contributes towards an increased sense of wellbeing for local residents. To allow this site to be developed goes against all three of these themes. Recent illegal felling of trees is of concern as it may be an attempt to facilitate development.

00078 Edward Glover - Objection to housing proposal H031 as this would result in the loss of valuable green space, currently enjoyed by local residents. Development would displace wildlife and destroy an area used for children's play and dog walking. The site has a protected footpath running through it and the current use aligns with Central Scotland Green Network Themes, which encourage the preservation of natural environments in inner city areas. It is concerning that trees have already been felled without permission. Housing development on this site would also result in a loss of privacy for neighbouring residents.

00079 Patricia Anderson - Objection to housing proposal H031 as this would result in the loss of valuable green space, currently enjoyed by local residents. Development would displace wildlife and plants and destroy an area used for children's play. The site is long established as a natural area and belongs to all local residents.

00086/4 George Clark - Objection to housing proposal H031, which should be removed from the development plan in its entirety as ownership of the land is not as outlined in the plan. According to the title deeds of said property, the site sits partly within the ownership of 33 Braidfauld Gardens. A public right of way exists to the north of the properties on Braidfauld Gardens.

The site provides a natural environment within a deprived area of the inner east end of

<p>Glasgow, which cannot be artificially replicated. The site falls within the Central Scotland Green Network (CSGN). The current use of the site aligns with the Central Scotland Green Network Themes - "A place for nature - creating an environment, where nature can flourish"; "a place to belong - creating an environment that people can enjoy and where they choose to live"; "a place to feel good - creating an environment which supports healthy lifestyles and well-being", and enhances the area, contributing towards an increased sense of wellbeing for local residents. Trees have already been felled without permission. The area contains mining works which may make it unsuitable for development.</p> <p>00391 Evelyn MacDougall - Objection to housing proposal H031 as this would result in the loss of valuable green space, currently enjoyed by local residents, and would be to the detriment of the environmental and social well-being of this area. Development would displace flora and fauna and destroy an area used on a daily basis, for rest and relaxation.</p> <p>00440 Michael Monaghan - Objection to housing proposal H031. There has been a lack of public consultation, which is a contravention of the Planning etc. (Scotland) Act 2006, which requires any developer proposing more than 50 houses to consult with the local community. Development would result in the loss of valuable green space, enjoyed on a daily basis by the local community and would destroy a habitat for various flora and fauna. Population growth in the area would exacerbate on-street parking problems and create large volumes of refuse.</p> <p>00663 The Owner, Occupier or Lessee - Objection to housing proposal H031. There has been a lack of public consultation, which is a contravention of the Planning etc. (Scotland) Act 2006, which requires any developer proposing more than 50 houses to consult with the local community. Development would result in the loss of valuable green space, enjoyed on a daily basis by the local community and would destroy a habitat for various flora and fauna. Population growth in the area would exacerbate on-street parking problems and create large volumes of refuse.</p> <p>00666 Robert McCreddie - Objection to housing proposal H031. Housing development would result in the loss of privacy for neighbouring residents. Development would displace wildlife and destroy an area used for children's play. The site should be retained in its present state.</p>
<p><b>Modifications sought by those submitting representations:</b></p> <p>(00036), (00052), (00058), (00072), (00073), (00074), (00076), (00078), (00079), (00086), (00391), (00440), (00663), (00666) - Proposal H031 - South of Easterhill Street to be deleted as a housing proposal from the City Development Plan.</p>
<p><b>Summary of responses (including reasons) by planning authority:</b></p> <p><u>Objecting</u></p> <p>(00036), (00052), (00058), (00072), (00073), (00074), (00076), (00078), (00079), (00086), (00391), (00440), (00663), (00666) - Proposal H031 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size,</p>

neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.

The site is identified as protected open space on the Open Space Map. Part of the site is also within a Green Corridor. The site has not been identified as being within a Corridor of Wildlife Landscape Importance.

No planning application has yet been submitted for the site. Any proposal that is submitted would have to take account of the designations which apply to the site, in compliance with Policy CDP 6: Green Belt and Green Network, Policy CDP 7: Natural Environment, and associated Supplementary Guidance. Issues relating to protected wildlife, open space, rights of way/public access, privacy, parking and refuse collection would be matters for consideration at planning application stage.

The loss of views and property values are not planning related matters.

Glasgow City Council notified residents within 20 metres of this site with regards to it being included as a proposal in the new City Development Plan.

No modifications recommended.

#### **Reporter's conclusions:**

1. The site is located between Easterhill Street and the rear gardens of mainly semi-detached housing at Braidfauld Gardens. There is modern housing development to the north-east of the site. The site is vacant and overgrown, having received little management, and it has a significant amount of emerging and semi-mature tree cover.

#### Housing land supply

2. At Issue 17 above we have found that there will be a shortfall in the housing land supply. The council has explained that the site was included in the Glasgow Housing Land Supply 2012 and has been included in the agreed 2013 land supply. The council has included the site in the Proposed Plan because it considers that it can help to meet the shortage of housing land.

#### Loss of open space

3. The site is accessible from Easterhill Street and has a network of footpaths. From the representations it appears to be used as incidental open space by local residents including dog walking and children's play space. From the representations received it is clearly valued by the local community. It is submitted in representations that the site is one of the few green areas left in the Braidfauld and Dalbeth region.

4. The site is designated as protected open space on the Open Space Map and is also partly within a green corridor. Reference is made in representations to the site's functional connection with three of the Central Scotland Green Network themes. I note that the site is an area of informal open space which is used for exercising dogs. Any planning application for housing development would have to be assessed by the council against Policy CDP6: Green Belt and Green Network and Policy CDP7: Natural Environment in the Proposed Plan, and any relevant supplementary guidance. The

council would need to have regard to the availability of open space in the area, and any development proposal would be expected to retain the maximum tree cover.

#### Impact on wildlife

5. Representations have referred to flora and fauna on the site including hedgehogs, bird species, squirrels, foxes, butterflies, bees and orchids. I would expect that any planning application for the site would include an ecological survey and any proposed wildlife mitigation measures as appropriate.

#### Recent tree felling and potential loss of trees/woodland

6. Although local residents report an instance of tree felling there is still a significant amount of tree cover on the site. Any further felling activity would be a matter for the council/Forestry Commission to investigate. A planning application would need to include a tree survey as a basis for assessing which trees and shrubs could be retained as part of any future development.

#### Consultation by the council

7. The Planning etc (Scotland) Act 2006 requires pre-application consultation for any housing site with greater than 50 units. I note that the council notified residents within 20 metres of the site regarding its inclusion in the Proposed Plan. Pre-application consultation would only be carried out if the submission of an application was under consideration. Following such a consultation I would expect that if a planning application was received by the council local residents would again be consulted on the proposal in accordance with the council's standard consultation procedures and in line with the normal development management process.

#### Public rights of way

8. In response to my request for further information the council has advised that that there are formal paths associated with the old Tollcross Station that used to occupy the site. It is apparent from the evidence that is available, that a right of way at Common Law is likely to have been established on these routes. It appears that they were used by the public for 20 or more years whilst the station was operating, and afterwards until such time as access was physically disrupted by fencing. As there is no record of any legal order stopping-up these potential rights of way, and as the fencing was introduced within the last 20 years, the legal rights are likely still to exist, albeit they are not physically exercisable along the full length of the paths due to obstruction by fencing. There are also informal paths that are currently apparent on the ground. Some of these may also have been in use for 20 or more years, but as they do not connect one public place to another they are unlikely to meet the criteria for rights of way at Common Law.

9. The council adds that any application to develop the site would need to take into consideration current use of the site by the public, and existing rights of way at Common Law. However, consideration could be given to formally diverting or stopping-up any rights of way at Common Law, where appropriate, to enable development to go ahead, provided appropriate mitigation were to be introduced. It seems to me that the existence of these paths would not necessarily prevent development of the site subject to the correct procedures, including public consultation, being followed.

Land ownership

10. In response to my request for further information the council has confirmed that it owns part of the site next to Easterhill Street and the remainder of the land is in private ownership. The owners of No.33 Braidfauld Gardens have indicated that they and the owners of No.35 Braidfauld Gardens own a small area of land at the rear of their property and within the site. This coincides with a path (indicated by the council to be an established right of way at Common Law) that provides access to the properties and which must be maintained. Clearly that land cannot be developed without the permission of the owners. However, the fact that it is in separate ownership would not prevent the development of the remainder of the site.

Car parking

11. There is unrestricted parking along Easterhill Street in front of the site. The modern properties opposite have off-street parking spaces. I would expect the council to ensure that any planning proposal that may be received addresses the issue of off-street parking by providing adequate parking provision for residents and visitors to any proposed dwellings, in accordance with the council's parking standards. This should prevent any significant additional parking in the area, including at Braidfauld Gardens.

Effect on the amenity of existing residents

12. Representations have been received from neighbouring residents regarding potential loss of privacy, loss of light and views of the site. The council should take these matters into account if a planning application is submitted, having regard to the proposed layout and design of dwellings near to the site boundaries and likely impact upon existing houses and their gardens. This would include adequate separation distances between properties and consideration of the positioning of windows in the proposed houses to minimise any overlooking. The matter of loss of property values from a development is not a material planning consideration that can be given any weight.

13. Any development on the site would have to include appropriate facilities for waste storage, recycling and ease of access for waste collection vehicles.

Mineworkings

14. The council has confirmed that the site is underlain by solid rock of the Lower Middle Coal Measures formation dipping south at low angles. The Main coal outcrops immediately north of the site and has been worked at shallow depth below rockhead. The site is therefore "minerally unstable". An outlier of the Ell coal is recorded in the southern part of the site, which may also have been worked at shallow depth. A site investigation was carried out in 1997. Three out of four boreholes encountered voids or packed waste at the horizon of the Main coal with very little rock cover. The site investigation report concluded that the seam would require to be consolidated by grout injection, subject to further mineral bores being sunk.

15. The information supports the representations that the site is located within an area containing mining works. However, this may not necessarily rule out a housing proposal. Any planning application should include information regarding land stability and measures to make safe any old workings that may be present. Planning conditions may be imposed by the council to require any necessary remedial work to be carried out and validated

prior to any construction.

16. Although the site is in separate ownerships and is subject to the various constraints mentioned above, the bulk of the site is potentially capable of becoming an effective housing site that could help meet the shortfall in the housing land supply.

**Reporter's recommendations:**

No modifications.

Issue 29	Housing Proposal H044 Custom House Quay Gardens	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55)	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Richard Stead (00031)		
Provision of the development plan to which the issue relates:	H044 Custom House Quay Gardens is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 388 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00031 Richard Stead - Objection to housing proposal H044. Development of this site for housing would destroy the public amenity of the open riverside and inhibit full access to the riverbank by the general public. The surrounding area has an extensive supply of vacant properties and brownfield sites. These should be prioritised for development over sites on the riverbank which have the potential to provide high quality public amenity space, and a valuable link along the riverside to Glasgow Green.		
Modifications sought by those submitting representations:		
00031 Richard Stead - Proposal H044 - Custom House Quay Gardens to be deleted as a housing proposal from the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00031 Richard Stead - Proposal H044 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.  The site was included in the Housing Land Supply on the basis of a 2005 planning permission. A pre-application notice was submitted in 2010, but no further detailed application has yet been submitted. Should a detailed proposal be developed, issues such as public access to the river would be considered at this stage. The Clyde Walkway is identified as a Core Path in the Council approved Core Paths Plan.  No modifications recommended.		



**Reporter's conclusions:**

1. Addition to the housing land supply site H044 is a linear strip of land located next to the River Clyde and near to Glasgow city centre and the Central Station. The representation seeks deletion of the housing allocation and retention of the site as parkland for the Glasgow public. The site is clearly well used as a riverside walkway, cycleway and jogging route. Much of the land is either hard surfaced or landscaped with tree planting and forms an area of riverside public realm contrasting with the high rise development and older buildings on the opposite side of Clyde Street. From the site inspection it was apparent that this part of the Clyde corridor has been the subject of the Custom House Quay Gardens public realm improvements under the Glasgow Wide Cycle Route Enhancement Programme.
2. Reference is made to opportunities in the area to redevelop vacant land and buildings rather than this site. I have no doubt that council will have assessed these opportunities. Moreover, the Proposed Plan does not specifically allocate sites that would generate less than 50 housing units. In Issue 17 above we have found that there will be a shortfall in the housing land supply. Site H044 is capable of helping to meet this shortfall towards the end of the Proposed Plan period and to provide homes in a sustainable location in the central area of the city.
3. I agree with the representation that it is also important to retain public access to the riverside for pedestrians and cyclists and see no reason why a development of an appropriate size, siting and scale could not be designed to achieve this. In addition, the site is part of the Clyde Walkway. It is designated as a Core Path in the council's approved Core Paths Plan. Core Paths are designated to provide sufficient routes within an area and to ensure that those routes are not blocked by development. The detailed access arrangements for the Clyde Walkway and associated open space should be assessed at the time of any planning application for development. A proposal for more than 50 housing units would have to be the subject of pre-application consultation under procedures for major development proposals.

**Reporter's recommendations:**

No modifications.

Issue 30	Housing Proposal H049 Bellrock St/Lamlash Cres	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55), Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Muriel Pearson (00143) Sergiy Lesyk (00371)		
Provision of the development plan to which the issue relates:	H049 Bellrock St/Lamlash Cres is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 150 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00371 Sergiy Lesyk - Objection to housing proposal H049. There are plenty of available brownfield sites in Glasgow which could be developed before green areas. This site is a green area and is therefore a valuable resource for local residents. Pressure on infrastructure, waste, and schooling will increase.  00143/10 Muriel Pearson - General comment on Proposal H049 - Bellrock St/Lamlash Cres. Land zoned for affordable housing (Proposal H049) should be zoned for a mixture of social housing, shared equity and owner occupied housing.		
Modifications sought by those submitting representations:		
00371 Sergiy Lesyk - Proposal H049 - Bellrock St/Lamlash Cres to be deleted as a housing proposal from the City Development Plan.  00143/10 Muriel Pearson - Proposal H049 - Bellrock Crescent/Lamlash Cres to be zoned for a mixture of social, shared equity and owner occupied housing in the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00371 Sergiy Lesyk - Proposal H049 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.		

The site is a demolished housing site now grassed over. The residential use for this site is considered to be suitable due to its proximity to public transport and neighbouring residential uses.

No planning application has yet been submitted for the site. Issues such as parking, drainage and layout would be a consideration at planning application stage. Education provision would be considered by Education Services.

No modifications recommended.

00143/10 Muriel Pearson - This site has been identified for owner-occupied housing based on information from the Councils Housing Investment team. Housing for social rent or shared equity would not be precluded from this site, should there be sufficient public sector funding to support the development.

No modifications recommended.

### **Reporter's conclusions:**

1. The housing proposal consists of two areas of former housing land, now grassed over and separated by Bellrock Street.

#### Housing mix

2. The representation on behalf of Cranhill Parish Church seeks that land allocated at the site for affordable housing should be zoned for a mixture of social housing, shared equity and owner occupied housing. The council has indicated that the site has been identified for owner-occupied housing, but advises that housing for social rent or shared equity would not be precluded from the site, depending upon public sector finance. The housing mix for the site would be a matter to be determined when a planning application is made and informed by housing need in the area. There would be an opportunity for neighbours to make representations on this matter through the council's consultation procedures for planning applications.

#### Development of other vacant and derelict land in the area

3. It is submitted that there is too much vacant land which is unsightly, perceived as unsafe because it is not overlooked and subject to fly tipping. Extensive vacant and derelict land is shown on the Easterhouse Strategic Development Framework in the comparatively small area bounded by the M8, Stepps Road, Edinburgh Road and Ruchazie Road. It is suggested that new housing is essential as the current population size makes sustaining shops, transport and schools difficult. It is requested that all appropriate land identified by the Scottish Vacant and Derelict Land Survey 2012 should be developed so that there is no unproductive land in the area.

4. In addition, reference is made to the strong local identity of Cranhill and the concept of Cranhill Urban Village, currently being explored by local residents through the Church of Scotland 'Chance to Thrive' project and Cranhill Development Trust.

5. The council has responded in relation to similar representations, covered by Issue 17, by referring to Policies CDP2 and CDP1 of the Proposed Plan which support the reuse of vacant and derelict land. I would expect the council to re-appraise the future use of all

derelict land indicated on the Easterhouse Strategic Development Framework in its next review of the local development plan, including any within the vicinity of proposal H049. However, I note from Background Paper 2: Sustainable Spatial Strategy, that many derelict sites may have geotechnical or contamination problems.

6. No specific changes to the boundary of housing proposal H049 have been suggested. I see no need for a modification in this respect. In terms of effectiveness, the council has advised that the 150 houses proposed for the site are expected to contribute to the housing supply for the plan area, albeit towards the end of the Proposed Plan period.

#### Retention of open space

7. It is submitted that the green area should be left free from development, given that Glasgow has so many brownfield sites. As a compromise the representation suggests that as a bare minimum the land to the south of Bellrock Street should remain free of development and for common use.

8. We have concluded in Issue 17 above that there will be a shortfall in the housing land supply. For this reason, development is needed on greenfield sites and restored former housing sites in addition to derelict and vacant sites. Proposal H049 includes a significant area of land, including the linear belt of land south of Bellrock Street. Any proposal would be subject to the requirement in Policy CDP8 for new development to meet the open space standards in forthcoming supplementary guidance. I would anticipate that the council would apply its standards to secure an appropriate area of public green space within the site or in a location that is accessible for local residents. If a planning application is submitted there would be a further opportunity for neighbours to make representations on the provision of green space through the council's consultation procedures.

#### **Reporter's recommendations:**

No modifications.

Issue 31	Housing Proposals H051 and H052 Gartnavel Hospital, Shelley Rd	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55), Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
NHS Greater Glasgow and Clyde (00592) Alyson Harland (00810) – Proposal H051 only		
Provision of the development plan to which the issue relates:	H051 and H052 Gartnavel Hospital, Shelley Rd are sites from the 2012 Housing Land Supply, which provides for the construction of approximately 165 houses and 100 houses respectively. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00592 NHS Greater Glasgow and Clyde - NHS Greater Glasgow and Clyde intend to retain Gartnavel site entirely for health related uses and have no plans to dispose of any part of it to private developers for housing. Therefore, the removal of areas shown on Proposal References H051 and H052 as potential future housing development sites is requested. The NHS submitted a masterplan to Glasgow City Council in 2002 which indicated an intent to dispose of a significant part of the Gartnavel site for development. Since then there has been a significant review of the Property and Asset Management Strategy. The Property and Asset Management Strategy for 2011-16 identifies Gartnavel as the location for provision of Out Patient services to be relocated from the Western Infirmary and notes a programme of ward refurbishments, and no longer identifies any surplus site availability or disposal of any part of the Gartnavel site. In recognition of the outdated masterplan, the NHS last autumn appointed a consultant team to prepare a new Campus Plan. Early engagement meetings were held with Development and Regeneration Services. Consultation is expected to begin before the end of the summer and a new Campus Plan accepted before the end of the year.  00810 Alyson Harland – I would like to request that this potential housing development site be removed from the private sector housing land supply list so that it is not carried over into the new development plan. It is invaluable historically and also in terms of sustaining wildlife and maintaining a functional ecosystem. It provides patients visitors and local residents with healthy exercise and Occupational Therapy. It enhances the quality of life to those visiting and residing in the area. Once lost it cannot be returned!  The position of the sketch also suggests that significant woodland with magnificent trees which are one of the few natural habitats remaining in this area would be lost. They sustain a wide variety of woodland birds and creatures and encourage bio-diversity. This is a particularly popular walking and leisure area for both hospital patients and their families and also for local families living in the area. It truly reflects the values and beauty of Glasgow, "the dear green city". No assessment has been carried out to evaluate what is there on site and to establish what would be lost.		

The provision for absorbing the potential of so much extra traffic from such a large housing complex has not been addressed. Is there now perhaps a requirement for the council to re-assess the pressure on the infrastructure, local need and the feasibility for carrying forward such a large housing proposal?

I understand part of the land identified for development is common good ground which "should be used for the good of the people". Is this land not therefore protected from development?

#### **Modifications sought by those submitting representations:**

00592 NHS Greater Glasgow and Clyde - Proposal H051 and H052 - Gartnavel Hospital, Shelley Road - to be deleted as housing proposals from the City Development Plan.

00810 Alyson Harland - Proposal H051 be removed from the housing supply.

#### **Summary of responses (including reasons) by planning authority:**

##### Objecting

00592 NHS Greater Glasgow and Clyde, 00810 Alyson Harland - NHS Greater Glasgow has submitted a representation (00592 refers) indicating that the site which is the subject of Proposal H051 is required for healthcare purposes, and is no longer considered to be a proposal for housing development. In view of the updated proposals from NHS Greater Glasgow and Clyde, the Council supports the deletion of Proposals H051 and H052 from the Policy and Proposals Map and the Schedule of Proposals. The site will also be deleted from 2014 Housing Land Supply.

The Reporter could, if so minded, amend the Plan to delete Proposals H051 and H052 from the Policy and Proposals Map, and from the Schedule of Proposals.

#### **Reporter's conclusions:**

1. In response to a further information request, Montagu Evans as the agent for NHS Greater Glasgow and Clyde, confirmed on 21 October 2015 that the site is to be retained for healthcare use. It is therefore not an effective housing proposal.

#### **Reporter's recommendations:**

Modify the Proposed Plan Policy and Proposals Map and the schedule of proposals by deleting Proposals H051 and H052.

Issue 32	Housing Proposal H055 Lochgilp St (Maryhill Locks)	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55), Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Laurence King (00455) Friends of the River Kelvin (00503)		
Provision of the development plan to which the issue relates:	H055 Lochgilp St (Maryhill Locks) is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 167 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00455 Laurence King - Objection to housing proposal H055. Green and open spaces are vital to the wellbeing of residents in Glasgow. Such spaces are also crucial to enabling a degree of biodiversity by the provision of sufficient habitat. Development of this site, which is one of the last reasonably wide areas of green space bordering the River Kelvin, will exacerbate the constriction of the river valley, which is at a level unprecedented since the industrial era.  00503/3 Friends of the River Kelvin - Objection to housing proposal H055. Whilst not an objection to the principle of housing on this site, it is requested that the site boundary be reconsidered to create a buffer to the Kelvin Walkway, in order to recognise the importance of the Kelvin Walkway for recreation and protect the Green Corridor formed by The River Kelvin. Proposed development should be restricted to the footprint of streets and buildings which occupied the site prior to demolition. Loss of open space in the area contravenes the principles expressed in CDP 7.		
Modifications sought by those submitting representations:		
00455 Laurence King - Proposal H055 - Lochgilp Street (Maryhill Locks) to be deleted as a housing proposal from the City Development Plan.  00503/3 Friends of the River Kelvin - Boundary to proposal H055 - Lochgilp Street (Maryhill Locks) to be reduced in the City Development Plan to create boundary area between development and the Kelvin Walkway. Change to proposed area for development to exclude existing area of trees and shrubs adjacent to Skaethorn Road.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00455 Laurence King, 00503/3, Friends of the River Kelvin - Proposal H055 has been		

identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.

Since the site was identified in the Housing Land Supply, planning permission for residential development has been granted by the Council (Ref 13/02505/DC refers). The extent of housing proposed is limited to the footprint of the former housing bounded by Lochgilp Street and Whitelaw Street, and therefore does not affect the Kelvin Walkway, the Site of Importance for Nature Conservation, the Corridor of Wildlife Landscape Importance or the protected open space that forms part of the Kelvin Corridor.

No modifications recommended.

#### **Reporter's conclusions:**

1. The site includes cleared former housing land which slopes down towards the River Kelvin. It is located within the Maryhill Transformational Regeneration Area.
2. Representations seek to ensure that there is no extension of the new built area beyond the previously developed area, the creation of a boundary area between development and the River Kelvin, and a change to the proposed area for development to exclude the existing area of trees and shrubs adjacent to Skaethorn Road.
3. The council has advised that permission has been granted for housing development. Construction was underway at the time of my site inspection. The council has confirmed that the extent of housing is limited to the footprint of the former housing bounded by Lochgilp Street and Whitelaw Street, and therefore does not affect the Kelvin Walkway, Site of Importance for Nature Conservation or the protected open space that forms part of the Kelvin corridor.
4. The council has not suggested any modification to the site boundary. However, I consider that the western boundary of the site should be amended to exclude the Kelvin Walkway and associated open space in order to safeguard those important resources.

#### **Reporter's recommendations:**

Modify the Proposed Plan Proposals Map by amending the western boundary of Housing Proposal H055 to exclude the Kelvin Walkway and associated protected open space.



Issue 33	Housing Proposal H057 Anderston Quay/Cheapside St	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Dandara Ltd (00604)		
Provision of the development plan to which the issue relates:	H057 Anderston Quay/Cheapside St is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 853 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00604/1 Dandara Ltd - Objection to housing proposal H057. The site boundary of this proposal requires to be amended to reflect the boundary plan provided in support of this representation. This would reflect the work in progress between Dandara and Glasgow City Council in bringing forward this strategic housing site for the City.  00604/3 Dandara Ltd - Objection to housing proposal H057. The wording of this proposal requires to be amended to remove reference to the tenure of the housing as this would be overly restrictive, and tenure should be driven by market requirements rather than the Development Plan.		
Modifications sought by those submitting representations:		
00604/1 Dandara Ltd - Boundary to proposal H057 - Anderston Quay/Cheapside Street to be amended in the City Development Plan.  00604/3 Dandara Ltd - Wording relating to proposal H057 - Anderston Quay/Cheapside Street to be amended in the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00604/1 Dandara Ltd – The area immediately west of the proposal site is currently designated as an Economic Development Area. The proposal site has been the subject of a Proposal of Application Notice 14/01500/DC (OC63A) and an EIA screening Opinion 15/01074/DC (OC63B). However no p application has been submitted. Given this status it is considered inappropriate to remove the EDA designation and increase the coverage of the proposal as per the objection. A corresponding response is also included in Issue 10 Economic Development.  No modifications recommended.		

00604/3 Dandara Ltd - Proposal H057 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.

The site has been identified for having potential for private housing, however affordable housing at this site is not precluded taking into account changing market conditions.

No modifications recommended.

#### **Reporter's conclusions:**

1. Proposed housing land supply allocation H057 is a linear area of mainly cleared land located to the north of Anderston Quay and the River Clyde.
2. The representation seeks the addition of an adjoining strip of land located between Cheapside and Piccadilly. The additional land is currently used as a pay and display car park and is next to a fly-over for the Clydeside Expressway.
3. In response to my further information request the council has confirmed that it has a current application (ref: 15/01157/DC) for a mixed use development including 603 flats, retail, commercial, restaurant, gym and car parking. This application includes the additional land subject to the representation plus a small additional area partly occupied by buildings. Although the application site is larger than site H057, the proposal involves a reduction of the number of housing units from 853 to 603.
4. Without prejudice to the council's determination of the application I consider that it would be appropriate to extend site H057 and re-draw its boundary to coincide with that of the planning application. Inclusion of the additional land suggested in the response would provide a basis for a comprehensive housing-led scheme and investment in the area. I note that there is no mixed use land use designation or residential designation within the proposals map. The additional land is within an Economic Development Area. Nevertheless, I consider that an alternative use would have no significant impact on the supply of industrial land and would be of an insufficient scale to prejudice the council's proposed review of Economic Development Areas.

#### **Reporter's recommendations:**

Modify the Proposed Plan Policy and Proposals Map and the schedule of proposals by extending the boundary of Housing Proposal H057 to coincide with that subject to application ref: 15/01157/DC.

Issue 34	Housing Proposal H063 121-157 Lancefield St	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Michael O'Garro (00515)		
Provision of the development plan to which the issue relates:	H063 121-157 Lancefield St is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 280 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00515 Michael O'Garro - Objection to housing proposal H063. This proposal should be removed from the proposed City Development Plan and from the Council's Housing Land Supply as Wolseley UK Ltd currently operate from this site. The land is in private ownership and given the current established use it is unlikely that the site would come forward for residential development before the end of the Plan period in 2025. The site is neither available nor deliverable. The Proposal is not in accordance with relevant policy as it is not capable of meeting housing land requirements as part of the 'effective' supply and should therefore not be included in the emerging City Development Plan.		
Modifications sought by those submitting representations:		
00515 Michael O'Garro - Proposal H063 - 121-157 Lancefield Street to be deleted as a housing proposal from the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00515 Michael O'Garro - Proposal H063 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft.  The site was included in the Housing Land Supply on the basis of a 2003 planning application which has not been progressed. In view of the comments received that the existing business is expected to continue operating from this location, the Council agrees that the site should be removed from the Housing Land Supply and the Plan.  The Reporter could, if so minded, amend the Plan to delete Proposal H063 from the Policy and Proposals Map and the Schedule of Proposals.		

**Reporter's conclusions:**

1. The site is located in central Glasgow near Lancefield Quay at the River Clyde. It is occupied by a number of modern industrial units, including a car rental company, a Plumb and Drain Center, and an antique warehouse.
2. Wolseley UK Limited have operated the Plumb and Drain Center at Nos. 133 and 145 Lancefield Street since 2004. The company advises that the site is unavailable and unlikely to come forward in the suggested timescales due to it being in private ownerships and operational for other uses. It suggests that given the current uses there appears to be little chance of the site coming forward for residential development before the end of the plan period in 2025.
3. Wolseley UK Limited confirms that the site was originally included in the housing land supply because planning permission for residential development was granted in 2003. However, that permission lapsed and the site was developed for alternative uses including the company's current operations. Wolseley UK Limited occupy the bulk of the central part of the site and have no intentions of moving to other premises. No evidence has been submitted to suggest that the units at either side of the Plumb and Drain Center are likely to become vacant.
4. It is clear that the site is neither available nor deliverable and does not meet the tests for being part of the effective land supply in Scottish Planning Policy and PAN 2/2010: Affordable Housing and Housing Land Audits. The site provides a source of employment and should be removed from the housing land supply and Proposed Plan.

**Reporter's recommendations:**

Modify the Proposed Plan Policy and Proposals Map and the schedule of proposals by deleting Housing Proposal H063.

Issue 35	Housing Proposal H072 36a St Vincent Cres	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55 Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Peter Harford-Cross (00433)		
Provision of the development plan to which the issue relates:	H072 36a St Vincent Cres is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 70 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00433 Peter Harford-Cross - Objection to housing proposal H072. Due to the relatively compact nature of the site it is anticipated that a minimum of 4 storeys would be required to accommodate the proposed number of units into the development. This would constitute overdevelopment and the scale would adversely affect the setting of the adjacent conservation area and category A-listed terrace. The St Vincent Crescent Conservation Area Appraisal makes it clear that the open aspect to the south is important to the character of the conservation area. Development of the proposed intensity would also create greatly increased traffic flow, which would be problematic given that the cul-de-sac nature of St Vincent Crescent.		
Modifications sought by those submitting representations:		
00433 Peter Harford-Cross - Proposal H072 - 36a St Vincent Crescent to be deleted as a housing proposal from the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00433 Peter Harford-Cross - Proposal H072 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.  The site was included in the Housing Land Supply on the basis of a planning permission granted in 2007 for 132 flats. This permission has not been progressed, and subsequently part of the site has been developed for another use. The capacity of 70 for the remaining site is based on the approved density for the 2007 consent. No planning		

application has yet been submitted for residential development of this site. Should a proposal be submitted that is considered to be a major development, a pre-application consultation process with the local community would be required, where the issues of over-development, traffic, the Conservation Area status and the adjacent A listed terrace that are raised in the representation could be considered.

No modifications recommended.

#### **Reporter's conclusions:**

1. The site is located next to the St Vincent Crescent Conservation Area and the category A listed St Vincent Terrace. It includes offices occupied by Scottish Power. The bowling greens at the southern side of the terrace form an important open setting for the terrace.

2. The St Vincent, Corunna Street, Minerva Street Residents' Association consider that the proposed housing allocation would be too intense a development, potentially a minimum of 4 storeys in height and with increased traffic generation. The Association would be broadly in favour of a smaller scale housing development, with a much lower ridge height respecting the extremely high quality of the terrace it would face. Reference is made to the design and visual impact of recent examples of development in the vicinity.

3. The capacity of the site has been based on the density for a scheme approved in 2007, rather than on a recently proposed layout or design. If a planning application is submitted the council will need to have special regard to the desirability of preserving the setting of the listed building under Section 59(1) of the Planning (Listed Buildings and Conservation Areas) (Scotland) Act 1997. In addition, the provisions of Section 64(1) of the Act apply, which require the council to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

4. The council has advised that a pre-application consultation process would be required with the local community if a major development (greater than 50 dwellings) is proposed. The objective is for communities to be better informed about major development proposals and to have an opportunity to contribute their views before a formal planning application is submitted. I would also expect the council to consult local residents on any application as part of its normal development management procedures. This would allow further representations to be made on a specific proposal within the context of the conservation area and listed terrace.

5. The proposed height, massing and scale of any development will be an important consideration in ensuring that there would be no adverse impact on the setting of the listed terrace. The amount of traffic generation will need to be acceptable in terms of safety and noise and disturbance, given that St Vincent Crescent is a cul-de-sac and that all vehicles will have to pass the front of the domestic properties in the terrace.

#### **Reporter's recommendations:**

No modifications.

Issue 36	Housing Proposal H123 Shawbridge TRA, Bengal Pitches Site	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Bill Carson (00144)		
Provision of the development plan to which the issue relates:	Shawbridge TRA is one of eight Transformational Regeneration Areas in the City where fundamental change is proposed. Surplus multi storey social rented housing stock has been demolished and is in the process of being replaced by new mixed tenure housing.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00144/5 Bill Carson - Objection to the allocation of the Bengal pitches site, Pollokshaws for housing on the grounds that a proposal of this nature would involve the removal of trees, the site is subject to flooding and the proposed replacement pitches are too far away.		
Modifications sought by those submitting representations:		
00144/5 Bill Carson - Delete housing proposal to develop private housing on site of Bengal Street pitches unless appropriate facilities are provided locally.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00144/5 Bill Carson - Proposal H123 has been identified as a proposal in the City Development Plan due to it being included within 1 of 8 Transformational Regeneration Areas. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.  The pitch referred to was part of a school which has since been demolished. This site forms part of the Local Development Strategy (OC82) which sets out the Council and community's vision for the area over the next ten years to 2021. No application affecting the site has yet been submitted. Any proposal affecting the pitch would have to comply with Policy CDP 6: Green Belt and Green Network, and associated Supplementary Guidance, taking account of any views from SportScotland.  No modifications recommended.		

<b>Reporter's conclusions:</b>
<p>1. The representation seeks the retention of the existing Bengal Street pitches and facilities at Pollockshaws. It is submitted that the proposed replacement pitches would be around 1km away, which is considered in the representation to be unacceptable. It is advised that development would also cause issues regarding the upgrading of the walkway in the area.</p> <p>2. The pitch at Bengal Street near the vacant Sir John Maxwell School still has its goalposts but is overgrown. There are areas of maintained grassland next to the pitch.</p> <p>3. At issue 17 above we have concluded that there will be a shortfall in the housing land supply. The Bengal pitches site would help to meet that shortfall.</p> <p>4. The council advises that no planning application affecting the site has been submitted. However, if an application is received that affects the Bengal pitches the council will require to apply the provisions of Policy CDP6 and the associated supplementary guidance, and to consult Sportscotland. Scottish Planning Policy, at paragraph 226, indicates that outdoor sports facilities should be safeguarded from development except where a number of criteria are met. These include that the facility that would be lost would be replaced either by a new facility of comparable or greater benefit for sport in a location that is convenient for users, or by the upgrading of an existing outdoor sports facility to provide a facility of better quality on the same site or at another location that is convenient for users and maintains or improves the overall playing field capacity in the area by a comparable facility.</p> <p>5. I would also expect the council to consult local residents on any planning application in line with its normal development management procedures. This would provide an opportunity for residents to make any further representations regarding the potential loss of the playing fields, need to retain trees and the convenience of any replacement or upgraded facilities. A planning application may also need to be accompanied by a flood risk assessment in view of the proximity of White Cart Water.</p>
<b>Reporter's recommendations:</b>
<p>No modifications.</p>



Issue 37	Housing Proposal H079 Ellesmere St, Westercommon PS	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Hannah Baxter (00022) John Mackay (00520)		
Provision of the development plan to which the issue relates:	H079 Ellesmere St, Westercommon PS is a site from the 2012 Housing Land Supply which provides for the construction of approximately 60 houses. It is proposed that all of these houses will be affordable, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>		
<p>00520 John Mackay - Objection to housing proposal H079. Development on this site would result in the loss of a valued green space, currently used by residents for exercise and dog walking. Wester Common is of special importance precisely because there is no other comparable safe, accessible or sufficiently spacious green area for games in the Wester Common scheme. Ruchill Park is too remote and secluded, has never been regarded by the residents as safe, and is no longer easily accessible.</p> <p>There is a strong parallel with St Augustines in Milton, which was saved for the residents benefit, and is providing a much used activity hub for the area. Local residents, particularly those occupying maisonettes on Wester Common Road, would experience a loss of privacy and view. The increase in housing density and population may result in noise pollution. The effective removal of the open grassy area, its hillside and the enclosed sports pitch would inevitably cause disproportionate physical and psychological harm to the community and its historic social activity patterns.</p> <p>Wester Common has a high population density and very high levels of social deprivation. Given the abundance of land for housing development in North Glasgow, particularly in Possilpark, Hamiltonhill and Keppochill, it would be manifestly unreasonable to concrete over and destroy much needed common green space.</p> <p>00022 Hannah Baxter - Objection to housing proposal H079. This area should be developed as an extension to the adjacent allotment rather than for housing. This site was previously occupied by a primary school, and was therefore a focal point of the community. Using the land as an allotment would provide a new community focal point and would provide a range of community benefits, including the promotion of exercise, healthy eating and social interaction. A high proportion of residents live in flats and do not have access to a garden. Consequently, there is a waiting list for the existing allotment at Hamilton Hill. The Community Empowerment Bill may force the Council to create a food strategy identifying sites for allotments and community gardens. The proposed City Development Plan lacks green space within the city centre and consequently the Council may have a shortage of suitable space in which to provide</p>		

these facilities. The proposed Plan should identify additional green spaces for the future. The Development Plan is very difficult to understand if you know nothing about planning processes and legislation.
<b>Modifications sought by those submitting representations:</b>
00520 John Mackay, 00022 Hannah Baxter - Proposal H079 - Ellesmere Street, Westercommon Primary School to be deleted as a housing proposal from the City Development Plan.
<b>Summary of responses (including reasons) by planning authority:</b>
<p><u>Objecting</u></p> <p>00520 John Mackay, 00022 Hannah Baxter - Proposal H079 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.</p> <p>The site was declared surplus for educational purposes, and identified as a housing opportunity by the Council. No application has yet been submitted for the site. Any application would have to consider how to address the issue of protected open space, in accordance with Policy CDP 6: Green Belt and Green Network and associated Supplementary Guidance.</p> <p>Issues of privacy, noise and disturbance would be considered at planning application stage.</p> <p>The Glasgow Open Space Strategy, which is being prepared, is considering open space provision across the City, and includes the issue of allotment provision.</p> <p>No modifications recommended.</p>
<b>Reporter's conclusions:</b>
<p>1. A representation seeks to retain the old grounds of Wester Common Primary School as an area of green space and as a hub for the community. It advises that the land forms a fully enclosed area of open space used by young and old alike for decades. In addition, it is in full view of the maisonettes in Wester Common Road and the high rise flats, making it a popular area for parents to monitor their children's activities within an area of relatively high population density. It is considered in the representation that there are large areas of demolished housing at Possilpark and vacant land at Hamilton Hill that could be used instead of the proposed site. In addition, it is submitted that there would be a loss of privacy and increased noise and disturbance for the residents of Ellesmere Street and Wester Common Road as a result of developing the site for housing.</p> <p>2. Representation ref: 00022/2 seeks use of site H079 as an extension to Hamilton Hill allotments. It advises that there is a waiting list for allotments, houses in the area lack gardens and there would be community benefits from allotment use.</p>

3. At Issue 17 above we have concluded that there will be a shortfall in the housing land supply. Site H079 is required to help meet that shortfall.

4. The school has been demolished and the land is fenced off alongside Ellesmere Street. The council has advised that no application has been submitted for the site. A pre-application consultation process would be required with the local community if a major development (greater than 50 dwellings) is proposed. The objective is for communities to be better informed about major development proposals and to have an opportunity to contribute their views before a formal planning application is submitted.

5. I would also expect the council to consult local residents on any application as part of its normal development management procedures. An application would have to be assessed against Proposed Plan Policy CDP6: Green Belt and Green Network and associated supplementary guidance.

6. Policies for allotments and growing spaces are dealt with at Issue 6 above. The Council has advised that it is to refresh its Allotments/Food Growing Strategy. Allotment provision is also a consideration of the council's Open Space Strategy. The Council would need to assess whether it would be feasible to include any allotment space at site H079, having regard to the need for housing and its allotment strategy review.

**Reporter's recommendations:**

No modifications.

Issue 38	Housing Proposal H084 Drumlochy Rd/Gartloch Rd	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Muriel Pearson (00143)		
Provision of the development plan to which the issue relates:	H084 Drumlochy Rd/Gartloch Rd s a site from the 2012 Housing Land Supply, which provides for the construction of approximately 140 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00143/1 Muriel Pearson - General comment on Proposal H084 - Drumlochy Rd/Gartloch Rd. There is a lack of affordable housing in Ruchazie and a territorial split between low and high end housing, exacerbated by an extensive brownfield site.		
Modifications sought by those submitting representations:		
00143/1 Muriel Pearson - Proposal H084 - Drumlochy Road/Gartloch Road to be zoned for a mixture of social, shared equity and owner occupied housing in the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00143/1 Muriel Pearson - Proposal H084 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.  This site has been identified for owner-occupied housing based on information from the Council's Housing Investment team. Housing for social rent or shared equity would not be precluded from this site, should there be sufficient public sector funding to support the development.  To be identified in the housing land supply, the Council has to provide reasoning as to why a site has potential for housing, for example, the marketing of a site or the submission of a planning application. Therefore, not all sites identified in the Vacant and Derelict Land Survey are included within the housing land supply.		

No application has yet been submitted for this site. Issues such as access and open space provision would have to be considered at planning application stage.

Issues relating to territorial splits between different parts of Ruchazie, the housing mix, and gated communities, are not planning related matters.

No modifications recommended.

#### **Reporter's conclusions:**

1. The site is an elongated area of land which slopes down from Gartloch Road to Drumlochy Road. The majority of the site is overgrown and neglected with a significant area of trees stretching alongside Gartloch Road from its junction with Elibank Street. There are two abandoned football pitches in the central part of the site. The site has good access to bus routes. There is a parade of shops at Gartloch Road.

#### Housing Mix

2. The representation on behalf of Ruchazie Parish Church, informed by some of the local residents, seeks a mixture of social housing, shared equity and owner occupied housing. It is submitted that there is a lack of available affordable housing, especially one and two bedroom social housing. There is concern that a fully private estate would become a 'gated community' further dividing the two parts of the community.

3. However, I see no reason why the development should constitute a 'gated community' and fail to integrate with the existing development physically, or socially. The housing mix for the site would be a matter to be determined when a planning application is made and informed by housing need in the area.

#### Open space

4. An attractive social space like a village green is sought, plus good access for pedestrians, people with prams and cycles. If a planning application is submitted for developing the site, and other sites in the vicinity, the council will need to consider what open space is required in accordance with its standards and the pattern of footpath and cycleway linkages as appropriate. Clearly there has been some recreational use of the land in the past, evidenced by the abandoned pitches. There would be an opportunity for neighbours to make representations on these matters through the council's consultation procedures for planning applications.

#### Derelict and vacant land

5. It is suggested that all appropriate land should be zoned, with reference to the Scottish Vacant and Derelict Land Survey 2012. The council has responded in relation to similar representations, covered by Issue 17, by referring to policies CDP2 and CDP1 of the Proposed Plan which support the reuse of vacant and derelict land. I would expect the council to re-appraise the future use of all derelict land in the vicinity of Ruchazie in its next review of the local development plan.

#### **Reporter's recommendations:**

No modifications.

Issue 39	Housing Proposal H085 Bellrock Cres, St Modan's PS	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Muriel Pearson (00143)		
Provision of the development plan to which the issue relates:	H085 Bellrock Cres, St Modan's PS is a site from the 2012 Housing Land Supply which provides for the construction of approximately 52 houses. It is proposed that all of these houses will be affordable, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00143/10 Muriel Pearson - (Proposal H085) should be zoned for a mixture of social housing, shared equity and owner occupied housing.		
Modifications sought by those submitting representations:		
00143/10 Muriel Pearson - Proposal H085 - Bellrock Crescent, St Modan's Primary School to be zoned for a mixture of social, shared equity and owner occupied housing in the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00143/10 Muriel Pearson - Proposal H085 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.  The term 'affordable housing' can include housing for social rent, shared ownership and shared equity. This site has been identified for affordable housing based on information from the Councils Housing Investment team. Housing for owner-occupied housing would not be precluded from this site, should the private sector consider that the local market could support this tenure.  No modifications recommended.		

**Reporter's conclusions:**

1. The land at Bellrock Crescent is located to the north of Cranhill Parish Church. It consists of a neglected football pitch and surfaced areas associated with the former St Modans' primary school.

Housing mix

2. The representation on behalf of Cranhill Parish Church seeks that land zoned at the site for affordable housing should be zoned for a mixture of social housing, shared equity and owner occupied housing. The council has indicated that the site has been identified for affordable housing, but advises that owner occupied housing would not be precluded from the site. The housing mix for the site would be a matter to be determined when a planning application is made and informed by housing need in the area. There would be a further opportunity for neighbours to make representations on this matter through the council's consultation procedures for planning applications.

Development of other vacant and derelict land in the area

3. It is submitted that there is too much vacant land which is unsightly, perceived as unsafe because it is not overlooked and subject to fly tipping. Extensive vacant and derelict land is shown on the Easterhouse Strategic Development Framework in the comparatively small area bounded by the M8, Stepps Road, Edinburgh Road and Ruchazie Road. It is considered that new housing is essential as the current population size makes sustaining shops, transport and schools difficult. It is requested that all appropriate land identified by the Scottish Vacant and Derelict Land Survey 2012 should be developed so that there is no unproductive land in the area.

4. In addition, reference is made to the strong local identity of Cranhill and the concept of Cranhill Urban Village, currently being explored by local residents through the Church of Scotland 'Chance to Thrive' project and Cranhill Development Trust.

5. The council has responded in relation to similar representations, covered by Issue 17, by referring to policies CDP2 and CDP1 of the Proposed Plan which support the reuse of vacant and derelict land. I would expect the council to re-appraise the future use of all derelict land indicated on the Easterhouse Strategic Development Framework in its next review of the development plan, including any within the vicinity of proposal H085. However, I note from Background Paper 2: Sustainable Spatial Strategy, that many derelict sites may have geotechnical or contamination problems.

6. No specific changes to the boundary of housing proposal H085 have been suggested. I see no need for a modification in this respect. In terms of effectiveness, the council has advised that the 52 houses proposed for the site are expected to contribute to the housing supply for the plan area.

**Reporter's recommendations:**

No modifications.

Issue 40	Housing Proposal H020 Skerryvore Rd/St Gregory's SS	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Muriel Pearson (00143)		
Provision of the development plan to which the issue relates:	H020 Skerryvore Rd/St Gregory's SS is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 70 owner occupied houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00143/10 Muriel Pearson - (Proposal H020) should be zoned for a mixture of social housing, shared equity and owner occupied housing.		
Modifications sought by those submitting representations:		
00143/10 Muriel Pearson - Proposal H020 - Skerryvore Rd/St Gregory's SS to be zoned for a mixture of social, shared equity and owner occupied housing in the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00143/10 Muriel Pearson - Proposal H020 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.  This site has been identified for owner-occupied housing based on information from the Council's Housing Investment team. Housing for social rent or shared equity would not be precluded from this site, should there be sufficient public sector funding to support the development.  To be identified in the housing land supply, the Council has to provide reasoning as to why a site has potential for housing, for example, the marketing of a site or the submission of a planning application. Therefore, not all sites identified in the Vacant and Derelict Land Survey are included within the housing land supply.  No application has yet been submitted for this site. Issues such as access and open space provision would have to be considered at planning application stage.  No modifications recommended.		



Reporter's conclusions:
<p>1. Housing Proposal H020 relates to a former school site that has partly re-vegetated.</p> <p><u>Housing mix</u></p> <p>2. The representation on behalf of Cranhill Parish Church seeks that the land should be zoned for a mixture of social housing, shared equity and owner occupied housing. The council has indicated that the site has been identified for owner-occupied housing, but that housing for social rent or shared equity would not be precluded from the site, depending upon public sector funding. The housing mix for the site would be a matter to be determined when a planning application is made and informed by housing need in the area. There would be an opportunity for neighbours to make representations on this matter through the council's consultation procedures for planning applications.</p> <p><u>Development of other vacant and derelict land in the area</u></p> <p>3. It is submitted that there is too much vacant land which is unsightly, perceived as unsafe because it is not overlooked and subject to fly tipping. Extensive vacant and derelict land is shown on the Easterhouse Strategic Development Framework in the comparatively small area bounded by the M8, Stepps Road, Edinburgh Road and Ruchazie Road. It is considered that new housing is essential as the current population size makes sustaining shops, transport and schools difficult. It is requested that all appropriate land identified by the Scottish Vacant and Derelict Land Survey 2012 should be developed so that there is no unproductive land in the area.</p> <p>4. In addition, reference is made to the strong local identity of Cranhill and the concept of Cranhill Urban Village, currently being explored by local residents through the Church of Scotland 'Chance to Thrive' project and Cranhill Development Trust.</p> <p>5. The council has responded in relation to similar representations, covered by Issue 17, by referring to Policies CDP2 and CDP1 of the Proposed Plan which support the reuse of vacant and derelict land. I would expect the council to re-appraise the future use of all derelict land indicated on the Easterhouse Strategic Development Framework in its next review of the development plan, including any within the vicinity of proposal H020. However, I note from Background Paper 2: Sustainable Spatial Strategy, that many derelict sites may have geotechnical or contamination problems.</p> <p>6. No specific changes to the boundary of Housing Proposal H020 have been suggested. I see no need for a modification in this respect. The council has advised that the capacity of the site has been increased to 97 units, but that the site is considered to be non-effective in the 2014 housing land audit. Nevertheless, the site is expected to contribute to the housing supply for the plan area, albeit at the end of the Proposed Plan period.</p>
Reporter's recommendations:
No modifications.

Issue 41	Housing Proposal H103 adj to 515 Shettleston Rd	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Clyde Gateway URC (00664)		
Provision of the development plan to which the issue relates:	H103 adj to 515 Shettleston Rd is a site from the 2012 Housing Land Supply, which provides for the construction of approximately 110 houses. It is proposed that all of these houses will be for sale, and all are expected to contribute to the housing land supply for the plan area	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00664/5 Clyde Gateway URC - Objection to housing proposal H103. This site should retain flexibility for business/industrial use. This site is owned by Clyde Gateway and has existing consent for residential showpeople homes to the north of the site and business/industrial use on the Shettleston Road side of the site. This consent has been partly implemented and therefore the flexibility to implement business/industrial use on part of the site should be retained.		
Modifications sought by those submitting representations:		
00664/5 Clyde Gateway URC - Proposal H103 - Adjacent to 515 Shettleston Road to be deleted as a housing proposal from the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00664/5 Clyde Gateway URC – Proposal H103 has been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. It has also been included in the agreed 2013 land supply and the 2014 draft. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.  Proposal H103 had been identified as a proposal in the City Development Plan due to its inclusion within the Glasgow Housing Land Supply 2012. However, the site has since been deleted from the latest audit of the land supply as it has been developed as a show people's site. The existence of planning permission for industrial and business use on the southern part of the site establishes the principle of development for this use.		

The Reporter could, if so minded, amend the Plan to delete Proposal H103 from the Policy and Proposals Map and the Schedule of Proposals.

**Reporter's conclusions:**

1. The area north of Banskroft Place has consent for residential show people's homes. The eastern part of the site had been partly developed at the time of my site inspection. The western part up to Rigby Street was vacant, overgrown land. In view of the implemented planning consent this land is not available and does not meet the tests for being part of the effective land supply in Scottish Planning Policy and PAN 2/2010: Affordable Housing and Housing Land Audits.

2. The smaller, southern part of the site, between Shettleston Road, Rigby Street, Banskroft Place and a large self-storage unit was also vacant. Clyde Gateway URC advises that this part of the site has consent for business/industrial use. There are other business/industrial uses at the western side of Rigby Street. I consider that it would be appropriate in land use terms to retain the flexibility to implement the business/industrial use on the Shettleston Road side of the site as sought in the representation.

**Reporter's recommendations:**

Modify the Proposed Plan Policy and Proposals Map and the schedule of proposals by deleting Housing Proposal H103.

Issue 42	Housing Proposal H112 Corselet Road, Darnley	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Pamela McCafferty (00102) Luanna Towers (00155) Brenda Brown (00159) Thomas Carr (00385) Mr Smith (00388) Barry Rea (00561) Michelle McShane (00651)		
Provision of the development plan to which the issue relates:	H112 Corselet Road, Darnley is one of three sites identified through the City-wide Greenbelt Review in relation to the shortfall in private sector housing land supply at 2020. The site has an indicative capacity of fewer than 50 units.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00102 Pamela McCafferty - Objection to Proposal H112 - Corselet Road, Darnley for residential development on the grounds that a proposal of this nature would result in further loss of the Green Belt and have a negative impact on existing properties in terms of loss privacy, loss of value and reduced desirability of properties to potential housebuyers. A proposal of this nature would also have a detrimental effect on existing wildlife in the area and would impact negatively on the Dams to Darnley nature walk. In terms of traffic management, the existing access road would be unable to cope with the additional traffic that would result. Local facilities would also not be able to support a further new housing development in the local area.  00155 Luanna Towers - Objection to Proposal H112 - Corselet Road, Darnley for residential development on the grounds that a proposal of this nature would result in the loss of a local valued children's playspace, have a detrimental effect on existing wildlife in the area and local facilities would not be able to support a further new housing development in the local area.  00159 Brenda Brown - Object to Proposal H112, on the basis that it would affect the privacy and views from our house, its impact on wildlife in the area, and the effect that more housing would have on property values in the area. The green belt designation, which was a major factor in our decision in our choice of home, should be retained.  00385 Thomas Carr - Objection to Proposal H112 - Corselet Road, Darnley for residential development on the grounds that a proposal of this nature would result in further loss of the Green Belt and the existing access road would be unable to cope with the additional traffic that would result.		

00388 Mr Smith - Objection to Proposal H112 - Corselet Road, Darnley for residential development on the grounds that a proposal of this nature would have a negative impact on existing properties in terms of loss privacy, loss of value and reduced desirability of properties to potential housebuyers and have a detrimental effect on existing wildlife in the area.

00561 Barry Rea - Objects to the entire plan to re-zone green belt land to allow house building. Also opposes the proposed development which involves a change to the Green Belt boundaries to allow building of residential properties adjacent to existing housing. Development would result in the loss of green space and vital habitats for local wildlife. The area has seen unprecedented levels of house building which shows little sign of abating. The increase in both construction traffic and commuter vehicles since the program of construction began has been significant. The proposal also raises concerns about the future of the Dams to Darnley Park which has a boundary with the proposed development. The park is enjoyed by the local community and beyond due to its nature walks, diverse flora and fauna and recreational activities. As access to the park will be shared with the new development visitors might be deterred from using the space due to heavy volumes of construction traffic. In addition, recent housing developments have been built on the edge of this important parkland resulting in a loss of further green spaces. Development could also affect the privacy of current residents.

00651 Michelle McShane - Green Belt remain as is as there are other brownfield sites available. If this is not to be then I would like the planners to consider only allowing a small housing complex in the area to ensure that it does not encroach on current residents who live in a quiet, private residential setting nestled beside a current Green Belt area. I would like to propose that there is an adequate amount of space kept between the current houses and the new housing being built to ensure that our privacy, views and noise pollution is not compromised by this new housing complex. I would like to propose that the Corselet Road entrance is used only by current road users and that another entrance is built from within Parkhouse Estate as the road infrastructure is inadequate at Corselet Road to accommodate large amounts of traffic use and causes safety risks to the local residents of Millview Place and Corselet Road residents.

I am very anxious about any new housing development encroaching on my views and overlooking my property. I am anxious about the amount of noise pollution another housing complex in this area would cause to our residents and I am anxious about the safety of our children if another housing complex is built on our door step when our kids are used to a reasonably quiet street with not a lot of through traffic. Insufficient services available for the amount of housing being built within area.

#### **Modifications sought by those submitting representations:**

00102 Pamela McCafferty, 00385 Thomas Carr, 00155 Luanna Towers, 00159 Brenda Brown, 00561 Barry Rea, 00651 Michelle McShane – Proposal H112 - Corselet Road, Darnley to be deleted as a housing proposal from the City Development Plan.

00388 Mr Smith - Proposal H112 - Corselet Road, Darnley to be deleted as a housing proposal from the City Development Plan and the site developed as a children's play area and car park for the Dams to Darnley Country Park.

**Summary of responses (including reasons) by planning authority:**ObjectingHousing land supply/availability of brownfield sites

00561 Barry Rea, 00651 Michelle McShane, 00102 Pamela McCafferty - Brownfield sites make up a significant majority of the City's housing land supply. In order to be considered against the housing requirements set out in the Strategic Development Plan, sites have to be effective, i.e. capable of being developed within the period required. Assessment of Glasgow's supply against these requirements indicates that there is a shortfall of over 6,000 houses in the City's housing land supply for the period 2008 – 2020.

The site has been identified for housing development in response to that shortfall.

Loss of green belt

00102 Pamela McCafferty, 00159 Brenda Brown, 00385 Thomas Carr - The city-wide Green Belt Review (OC46) indicated that there were no significant objections received in the consultation relating to potential development locations. The review also noted that there were potential environmental and access benefits that could be delivered through development of the site.

Loss of green space/children's playspace

00561 Barry Rea, 00155 Luanna Towers, 00388 Mr Smith - The site is green belt, rather than green space. It is accepted that one of the functions of the green belt can be informal recreation, including children's play. In view of the ground conditions affecting the site, it is considered that the design of any development could incorporate measures to ensure access to recreation within the site and to the Dams to Darnley Country Park.

Impact on wildlife/biodiversity

00561 Barry Rea, 00102 Pamela McCafferty, 00155 Luanna Towers, 00159 Brenda Brown, 00388 Mr Smith - The site is separated by Corselet Road from Dams to Darnley Country Park, which is covered by various environmental designations: a Site of Importance for Nature Conservation, a Corridor of Wildlife Landscape Importance and a Local Nature Reserve. None of these designations affect the site which is the subject of these representations.

Any detailed proposal for housing would have to take account of any evidence of wildlife or protected species on the site, according to Development Plan Policy and Supplementary Guidance.

Roads infrastructure inadequate

00561 Barry Rea, 00651 Michelle McShane, 00102 Pamela McCafferty, 00385 Thomas Carr - Policy CDP 10 indicates that any development is likely to be limited in scale to fewer than 50 houses, due to the ground conditions affecting the site, and the requirement to provide enhanced parking provision related to the Dams to Darnley Country Park. It is considered, therefore, that traffic impact, both during construction and

following the completion of the development, is not likely to be significant and would not affect the usage of the park.

The capacity of the existing roads infrastructure is considered to be capable of coping with additional housing, given the limited scale of the development. The Strategic Environmental Assessment did not identify this issue as a constraint.

#### Impact on Dams to Darnley Country Park

00561 Barry Rea, 00102 Pamela McCafferty - CDP 10 indicates that development of the site would be dependent on the inclusion of additional parking to improve facilities for the country park, and therefore increase the usage of the park. The Council, along with East Renfrewshire Council, has an ongoing commitment to the country park, through the implementation of a masterplan which was jointly developed by an officer led working group.

#### Privacy/views/overlooking

00561 Barry Rea, 00651 Michelle McShane, 00102 Pamela McCafferty, 00159 Brenda Brown, 00388 Mr Smith - Issues relating to privacy and overlooking would be addressed as part of the consideration of a detailed planning application, in order to comply with appropriate Development Plan Policy and Supplementary Guidance.

In relation to loss of views, the points raised are not planning related matters.

#### Insufficient services

00651 Michelle McShane, 00102 Pamela McCafferty, 00155 Luanna Towers - It is considered that the limited scale of the development would not have a significant impact of existing services.

#### Property values

00102 Pamela McCafferty - The points raised are not planning related matters.

No modifications recommended.

#### **Reporter's conclusions:**

1. The site adjoins existing housing to the north-west of Corselet Road. To the south east of Corselet Road is the Dams to Darnley Country Park. The site includes a significant number of trees and shrubs, particularly on the sloping parts. There is an informal path through the lower part of the site that links the end of Bruntsfield Avenue with Corselet Road near to its junction with Millview Place.
2. All the representations seek the deletion of the housing proposal and oppose the loss of green belt land, within the context of other developments underway in the area. Reference is made to use of the land by wildlife, loss of privacy, unknown housing type, impact on the country park, overdevelopment in the area, available alternative brownfield sites, potential traffic problems on Corselet Road, highway safety and lack of capacity at the two local primary schools.

Housing land supply/availability of brownfield sites

3. At Issue 17 above we have concluded that there will be a shortfall in the housing land supply in the Proposed Plan period. It is clear that the housing target for the plan period cannot be met solely through the development of brownfield sites. The site would provide a limited number (indicative capacity of 40) housing units to help offset the housing shortfall.

Loss of Green Belt

4. The site at Corselet Road was identified through the city-wide Greenbelt Review in response to the predicted shortfall in housing land supply to 2020. It was considered in the review that there may be scope to develop a limited number of houses at this location, taking into account flooding and ground conditions. It was advised that any such development should deliver environmental and access benefits, including enhanced parking provision, to the country park in accordance with the Country Park masterplan.

Loss of greenspace/children's play space

5. The site is not designated as protected green space, but no doubt provides informal play space and recreational space for local residents. The council has advised that the design of any development could incorporate measures to ensure access to recreation within the site and to the Dams to Darnley country park.

Roads infrastructure

6. It appears that the topography and need for a car park to serve the country park would limit the number of houses. The council advises that the impact of generated traffic on the road network and use of the park is not likely to be significant. However, it is apparent that Corselet Road is narrow and has potholes where the surface is not consolidated. If a planning application is submitted I would expect the council to consult local residents in accordance with its normal development management procedures. There would be an opportunity for residents to make representations at that stage on any perceived traffic problems.

Impact on the Dams to Darnley Country Park

7. The council has advised that, jointly with East Renfrewshire Council, it has an ongoing commitment to the country park through implementation of a masterplan. I consider that, subject to conditions to mitigate any disturbance during the construction phase, the site could be developed with minimal impact on the recreational value of the country park.

Effect on the living conditions of neighbours/type of housing

8. If a planning application is submitted I would expect the council to consult local residents in accordance with its normal development management procedures. There would be an opportunity to make representations at that stage on the effect of the layout, design and siting of the proposed houses on the living conditions of neighbours regarding any potential loss of privacy or outlook, increased noise and disturbance and concerning the degree of separation from any new houses. Retention of boundary tree cover as appropriate could help to mitigate the visual impact of development.



Insufficient services

9. The council considers that the proposal would not have a significant impact on existing services, including schools, because of the limited scale of the development proposed. There is no detailed evidence to suggest that this might not be the case.

Property values and original purchase of houses

10. The effect of a development on property values is not a material consideration that can be given any weight. A number of residents of Millview Place advise that they were promised when buying their homes that no further developments would be built around them as the land was green belt. However, as explained above, the proposal for housing development has arisen as part of a review of the green belt, and the need for additional housing land is a material change in circumstances.

Impact on wildlife

11. If a planning application is submitted I consider that an ecological survey and tree survey would be necessary and consequently measures may be required to mitigate the impact on existing wildlife.

12. Overall, I consider that, subject to detailed assessment, the site could provide an opportunity for limited housing development.

**Reporter's recommendations:**

No modifications.

Issue 43	Housing Proposal H113 Summerston	
<b>Development plan reference:</b>	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	<b>Reporter:</b> Martin Seddon
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Anne Murray (00001) Ian William Mackie (00020) Eleanor Murray (00071) Kirsty Lapsley (00163) Manas Tiwari (00164) Mark Willis (00165) Stephanie Gibb (00166) Amran Shafi (00167) Chris Muldoon (00168) Christine Muldoon (00169) William C Tait (00170) Anna Donnelly (00171) Karen Aston (00172) K Smith (00173) Josephine Watret (00174) Robert Calder (00175) Robert Donnelly (00176) Michelle McGilp (00178) David Guthrie (00179) Amanda Guthrie (00180) Kenny Rattray (00181) Desmond Kimmet (00182) William Fleming (00183) Jane Smyth (00184) Patrick Bonar (00185) Graeme Hannah (00186) Leanne Hannah (00187) Ted Smith (00189) Neil Connell (00190) Carole Anne Smith (00191) Marion Carey (00192) Martin Carey (00193) W R Kerr (00194) Kathleen Wilson (00195) Robert Wilson (00196) Leanne Connell (00197) Rona Gorrod (00198) Michael Sweeney (00199) Alexander Loch (00200) Roger Gorrod (00201) John Barrett (00202) Catherine Barrett (00203) Margaret Galbraith (00204) Elaine McCubbin (00205)</p>	<p>Philip Hammond (00275) Deborah Hammond (00276) Lorn MacFadyen (00277) Mairi MacFadyen (00279) Mohammed Ali (00281) Robert Maxwell (00282) Alexandra Walker (00283) Iain Walker (00284) Craig Walker (00285) Deb Allan (00286) Christopher McGilp (00287) Mary Torrance (00288) Victoria Mackie (00289) James Davie (00290) Lynn Galloway (00291) Ian W Mackie (00292) S Anderson (00293) Laura McKinnon (00294) James McLernon (00295) Seema Mackenzie (00296) Karen Lawrie (00297) Christine Divers (00298) Stuart Firman (00299) Margaret Burgoyne (00300) Susan Harper (00301) Gary Irving (00302) Karen Irving (00303) David Bell (00304) Anne McLeod (00305) Craig McCarron (00306) Angela Diamond (00307) Wendy Shannon (00308) Paul Deans (00309) Donna Ronald (00310) Kenneth Ronald (00311) Jason Pearson (00314) Donald MacInnes (00315) Louise Pearson (00316) Shelly Montague (00317) Robert Weir (00318) Jeanette Weir (00319) John English (00320) Senga English (00321) Jim McLaughlin (00322)</p>	

Leanne Beresford (00206)	Matt Welsh (00323)
Catherine Devaney (00207)	A Donnelly (00324)
Lynne Komolafe (00208)	Elaine Lyons (00326)
Margaret Lothian (00209)	Lynne Bell (00327)
William Lothian (00210)	Richard Workman (00328)
Segun Komolafe (00211)	Jennifer Workman (00329)
Brian Wright (00212)	K Trearty (00330)
Duncan Dymock (00213)	M McGowan (00331)
Angela Wright (00214)	Neil Smith (00332)
Lynne Valentine (00215)	David Graham (00333)
Daniel Valentine (00216)	Wendy Smith (00334)
William R Kerr (00217)	Sylvia Harries (00335)
Alison L Kerr (00218)	Simon Harries (00336)
Marion Fraser (00219)	Alan Gregor (00337)
Susan MacDonald (00220)	Mrs Reilly (00338)
M Matthews (00221)	R Clyde (00339)
William Fitzpatrick (00222)	N Clyde (00340)
Simran Chall (00223)	Fiona White (00341)
Sharon Chall (00224)	Anne White (00342)
Raylinder Chall (00225)	Colin G White (00343)
Tracy O'Kane (00226)	Linda Matthews (00344)
Kerry Mullin (00227)	John Matthews (00345)
Pardip Singh (00228)	Danny Maxwell (00346)
Pardip Singh (00229)	Tarlock Singh (00347)
Jamie Solman (00230)	Gurmeet Singh (00348)
Caroline Owens (00231)	Pardip Singh (00349)
Graeme John Owens (00232)	Virrun Singh (00350)
Susan Owens (00233)	James Gibb (00351)
John Owens (00234)	Sarah Gibb (00353)
Vic Keogh (00235)	Amy Cowden (00354)
Carla Casci (00236)	Sally Gibb (00355)
Andrew McDonnell (00237)	Stephanie Cowden (00356)
Sean McGeady (00238)	Megan Cowden (00357)
Lisa McGeady (00239)	Eric Cowden (00358)
Lisa Wright (00240)	Margaret Cowden (00359)
Donnie McKinlay (00241)	Kenneth McNaughton (00360)
Roseanne McHugh (00242)	Oonagh McNaughton (00361)
Sharon McMillan (00243)	Debbie Barclay (00362)
J McLihiney (00244)	Gordon Barclay (00363)
Anne Brownlie (00245)	Amy Barclay (00364)
Chelsea Gilmour (00246)	Rachael Barclay (00365)
G Hopper (00247)	Virrun Singh (00366)
Christine McCarron (00248)	Steesh Singh (00367)
Derek Muirhead (00249)	Karen Irving (00380)
Joseph Dolan (00250)	Donald Irving (00381)
Donald Wilson (00251)	Irene Irving (00382)
Elaine Dutton (00252)	Paul Le Poidevin (00384)
Diane Marlin (00253)	Michelle McCabe (00396)
Claire Cairns (00254)	Charles Clark (00397)
Anita Bhalla (00255)	T Donnelly (00402)
Philip Scally (00256)	East Dunbartonshire Council (00411)
David Wright (00257)	Patricia Ferguson MSP (00420)

<p>Chester Studzinski (00258) Dawn Adams (00259) John Farrow (00260) Jayne Tollan (00261) Lynn Ferrier (00262) Kenneth Ferrie (00263) Lynn Ferrie (00264) Iris Sinclair (00265) George Sinclair (00266) Kirsty Sinclair (00267) Craig Sweeney (00268) Emily Meechan (00269) Scott Ferguson (00270) Maria Meechan (00271) Stuart Ferguson (00272) Eileen Ferguson (00273) Frank Meechan (00274)</p>	<p>Jim &amp; Morag McAloon (00437) Stephen Rutledge (00486) Friends of the River Kelvin (00503) Kevin Carlin (00516) Alan Wadsworth (00518) Gillian Britton (00559) Bob Doris MSP (00566) Scottish Natural Heritage (00574) David Henry (00584) Victoria Mackie (00585) Sharon Tait (00601) Professor Stephen Wimperis (00608) RSPB Scotland (00629) Caledonian Properties Ltd/Taylor Wimpey (00632) Oscar Mackay (00647) Luddon Construction (00815)</p>
<p><b>Provision of the development plan to which the issue relates:</b></p>	<p>H113 Summerston lies within a larger area identified through the City-wide Greenbelt Review as requiring further examination through a proposed feasibility study. The study will consider, among other issues, the extent of any capacity for additional housing in relation to the shortfall in private sector housing land supply at 2020.</p>
<p><b>Planning authority's summary of the representation(s):</b></p>	
<p><u>General Representation to Proposal</u></p> <p><u>Objecting</u></p> <p>00584 - To keep the area shown on Proposal H113 as green belt.</p> <p><u>Greenbelt Review 2014</u></p> <p><u>Objecting</u></p> <p>00380, 00381, 00382, 00396, 00397 - Comments by Scottish Natural Heritage on the Review identified a number of issues with the site: including:</p> <ul style="list-style-type: none"> <li>• Surface water flood risk;</li> <li>• Adverse impacts on landscape character and visual amenity within a Site of Special Landscape Importance;</li> <li>• Interruption or removal of key views:</li> <li>• Impact on key landscape attributes in western part of site by replacement of its rural pattern.</li> <li>• Loss of the valley enclosure role of the Blackhill slopes.</li> <li>• Much of site is covered by marshland, with two C-SINC lying either side of the Canal, a Scheduled Ancient Monument</li> <li>• Constrained by power lines</li> </ul> <p>SNH made a number of recommendations, and concluded that that the green belt designation should be retained. These comments and recommendations are supported.</p>	

## Scottish Planning Policy

### Objecting

00001, 00380, 00381, 00382, 00396, 00397, 00420, 00518 - The proposal is contrary to SPP support for the protection of (and access to) open space within and around towns and cities.

## City Plan 2/Main Issues Report (MIR)

### Objecting

00001, 00020, 00071, 00163, 00164, 00165, 00166, 00167, 00168, 00169, 00170, 00171, 00172, 00173, 00174, 00175, 00178, 00179, 00180, 00181, 00182, 00183, 00184, 00185, 00186, 00187, 00189, 00190, 00191, 00192, 00193, 00194, 00195, 00196, 00197, 00198, 00199, 00200, 00201, 00202, 00203, 00204, 00205, 00206, 00207, 00208, 00209, 00210, 00211, 00212, 00213, 00214, 00215, 00217, 00218, 00219, 00220, 00221, 00222, 00223, 00224, 00225, 00226, 00227, 00228, 00229, 00230, 00231, 00232, 00233, 00234, 00235, 00236, 00237, 00238, 00239, 00240, 00241, 00242, 00243, 00244, 00245, 00246, 00247, 00248, 00249, 00250, 00251, 00252, 00253, 00254, 00255, 00256, 00257, 00258, 00259, 00260, 00261, 00262, 00263, 00264, 00265, 00266, 00267, 00268, 00269, 00270, 00271, 00272, 00273, 00274, 00275, 00276, 00277, 00279, 00281, 00282, 00283, 00284, 00285, 00286, 00287, 00288, 00289, 00290, 00291, 00292, 00293, 00294, 00295, 00296, 00297, 00298, 00299, 00300, 00301, 00302, 00303, 00304, 00305, 00306, 00307, 00308, 00309, 00310, 00311, 00314, 00315, 00316, 00317, 00318, 00319, 00320, 00321, 00322, 00323, 00324, 00326, 00327, 00328, 00329, 00330, 00331, 00332, 00333, 00334, 00335, 00337, 00338, 00339, 00340, 00341, 00342, 00343, 00344, 00345, 00346, 00347, 00348, 00349, 00350, 00351, 00353, 00354, 00355, 00356, 00357, 00358, 00359, 00360, 00361, 00362, 00363, 00364, 00365, 00366, 00367, 00384, 00402, 00420, 00486, 00518, 00566, 00601, 00647

City Plan 2 and the Main Issues Report noted the advantages of using brownfield sites in preference to greenfield, including: limiting the impact of development on the natural environment, use of resources and infrastructure, contribution to regeneration. Release of land from the green belt would undermine this approach, and would be contrary to the Scottish Government's objectives on sustainable development, climate change and housing need. The MIR therefore confirmed that a preference for brownfield would remain the cornerstone of the City Development Plan. It is of deep concern that this position has been reversed within two and a half years of the MIR.

Development would tend to undermine the priority to regenerate in other locations through brownfield development.

## Feasibility Study

### Objecting

00411 - Areas 7C and 7D (Summerston/Balmore) should be retained as greenbelt rather than included under 'feasibility study to determine extent for greenbelt release'.

As explained in our consultation response at the 'additional sites' stage, East

Dunbartonshire Council is of the opinion that the proposed development area at Summerston is inappropriate for development, and that any release for development would compromise the principle of maintaining a compact city region. It is noted from Background Paper 3 that areas 7C and 7D will be the subject of a feasibility study "to determine the extent for greenbelt release". However, it is unclear what status this site would have in the LDP and is of a scale which should be analysed through the full LDP process. EDC therefore maintains its previous position and suggests that these areas should not be released from the greenbelt regardless of the outcome of the feasibility study.

00437, 00574 - There is a lack of clarity between the proposal for a feasibility study at the same time as a proposal for housing is identified in the Proposed Plan. This is producing uncertainty, both for residents and investors.

SNH 00574 - supports the feasibility study, but considers that there is limited housing potential within the site. A landscape capacity assessment should be incorporated within the study in order to comply with SPP. Proposal H113 should be removed from the Proposed Plan until the feasibility study has been completed, as its inclusion creates uncertainty and confusion as to its status. Any subsequent housing proposal could be incorporated in Supplementary Guidance.

#### Potential Additional Sites Consultation

##### Objecting

00001, 00071, 00163, 00164, 00165, 00166, 00167, 00168, 00169, 00170, 00171, 00172, 00173, 00174, 00175, 00178, 00179, 00180, 00181, 00182, 00183, 00184, 00185, 00186, 00187, 00189, 00190, 00191, 00192, 00193, 00194, 00195, 00196, 00197, 00198, 00199, 00200, 00201, 00202, 00203, 00204, 00205, 00206, 00207, 00208, 00209, 00210, 00211, 00212, 00213, 00214, 00215, 00217, 00218, 00219, 00220, 00221, 00222, 00223, 00224, 00225, 00226, 00227, 00228, 00229, 00230, 00231, 00232, 00233, 00234, 00235, 00236, 00237, 00238, 00239, 00240, 00241, 00242, 00243, 00244, 00245, 00246, 00247, 00248, 00249, 00250, 00251, 00252, 00253, 00254, 00255, 00256, 00257, 00258, 00259, 00260, 00261, 00262, 00263, 00264, 00265, 00266, 00267, 00268, 00269, 00270, 00271, 00272, 00273, 00274, 00275, 00276, 00277, 00279, 00281, 00282, 00283, 00284, 00285, 00286, 00287, 00288, 00289, 00290, 00291, 00292, 00293, 00294, 00295, 00296, 00297, 00298, 00299, 00300, 00301, 00302, 00303, 00304, 00305, 00306, 00307, 00308, 00309, 00310, 00311, 00314, 00315, 00316, 00317, 00318, 00319, 00320, 00321, 00322, 00323, 00324, 00326, 00327, 00328, 00329, 00330, 00331, 00332, 00333, 00334, 00335, 00337, 00338, 00339, 00340, 00341, 00342, 00343, 00344, 00345, 00346, 00347, 00348, 00349, 00350, 00351, 00353, 00354, 00355, 00356, 00357, 00358, 00359, 00360, 00361, 00362, 00363, 00364, 00365, 00366, 00368, 00402, 00566, 00601, 00647, 00486,

It is understood that the site was first considered as part of the Potential Additional Sites Consultation (PASC) in 2012, in which Caledonian Properties proposed the change of use from greenbelt to residential.

Responses to both the MIR and PASC consultations suggested that there was support for greenbelt release, but there is no evidence of Committee scrutiny of the decision to reverse the position taken at the Main Issues Report stage.

Strategic Development Plan/Housing Land SupplyObjecting

00001, 00071, 00163, 00164, 00165, 00166, 00167, 00168, 00169, 00170, 00171, 00172, 00173, 00174, 00175, 00178, 00179, 00180, 00181, 00182, 00183, 00184, 00185, 00186, 00187, 00189, 00190, 00191, 00192, 00193, 00194, 00195, 00196, 00197, 00198, 00199, 00200, 00201, 00202, 00203, 00204, 00205, 00206, 00207, 00208, 00209, 00210, 00211, 00212, 00213, 00214, 00215, 00217, 00218, 00219, 00220, 00221, 00222, 00223, 00224, 00225, 00226, 00227, 00228, 00229, 00230, 00231, 00232, 00233, 00234, 00235, 00236, 00237, 00238, 00239, 00240, 00241, 00242, 00243, 00244, 00245, 00246, 00247, 00248, 00249, 00250, 00251, 00252, 00253, 00254, 00255, 00256, 00257, 00258, 00259, 00260, 00261, 00262, 00263, 00264, 00265, 00266, 00267, 00268, 00269, 00270, 00271, 00272, 00273, 00274, 00275, 00276, 00277, 00279, 00281, 00282, 00283, 00284, 00285, 00286, 00287, 00288, 00289, 00290, 00291, 00292, 00293, 00294, 00295, 00296, 00297, 00298, 00299, 00300, 00301, 00302, 00303, 00304, 00305, 00306, 00307, 00308, 00309, 00310, 00311, 00314, 00315, 00316, 00317, 00318, 00319, 00320, 00321, 00322, 00323, 00324, 00326, 00327, 00328, 00329, 00330, 00331, 00332, 00333, 00334, 00335, 00337, 00338, 00339, 00340, 00341, 00342, 00343, 00344, 00345, 00346, 00347, 00348, 00349, 00350, 00351, 00353, 00354, 00355, 00356, 00357, 00358, 00359, 00360, 00361, 00362, 00363, 00364, 00365, 00366, 00367, 00402, 00437, 00486, 00566, 00601, 00647,

Although there is demand for new housing in Glasgow, the Strategic Development Plan/MIR conclusion that no further green belt release would be required, is contradicted by Background Paper 13: Green Belt Review, which stated that release was necessary to address a short-medium shortage of housing land caused by conditions in the housing market. It is considered that post 2011, the housing market was either static or improving, which would mean brownfield sites would become developable and greenfield release no longer necessary.

There is no evidence that this site would be more effective than other sites, such as those in the Community Growth Areas, which should be given preference.

Scale of Land Release/ConsultationObjecting

00001, 00071, 00163, 00164, 00165, 00166, 00167, 00168, 00169, 00170, 00171, 00172, 00173, 00174, 00175, 00178, 00179, 00180, 00181, 00182, 00183, 00184, 00185, 00186, 00186, 00187, 00189, 00190, 00191, 00192, 00193, 00194, 00195, 00196, 00197, 00198, 00199, 00200, 00201, 00202, 00203, 00204, 00205, 00206, 00207, 00208, 00209, 00210, 00211, 00212, 00213, 00214, 00215, 00217, 00218, 00219, 00220, 00221, 00222, 00223, 00224, 00225, 00226, 00227, 00228, 00229, 00230, 00231, 00232, 00233, 00234, 00235, 00236, 00237, 00238, 00239, 00240, 00241, 00242, 00243, 00244, 00245, 00246, 00247, 00248, 00249, 00250, 00251, 00252, 00253, 00254, 00255, 00256, 00257, 00258, 00259, 00260, 00261, 00262, 00263, 00264, 00265, 00266, 00267, 00268, 00269, 00270, 00271, 00272, 00273, 00274, 00275, 00276, 00277, 00279, 00281, 00282, 00283, 00284, 00285, 00286, 00287, 00288, 00289, 00290, 00291, 00292, 00293, 00294, 00295, 00296, 00297, 00298, 00299, 00300, 00301, 00302, 00303, 00304, 00305, 00306, 00307, 00308,

00309, 00310, 00311, 00314, 00315, 00316, 00317, 00318, 00319, 00320, 00321, 00322, 00323, 00324, 00326, 00327, 00328, 00329, 00330, 00331, 00332, 00333, 00334, 00335, 00337, 00338, 00339, 00340, 00341, 00342, 00343, 00344, 00345, 00346, 00347, 00348, 00349, 00350, 00351, 00353, 00354, 00355, 00356, 00357, 00358, 00359, 00360, 00361, 00362, 00363, 00364, 00365, 00366, 00367, 00402, 00437, 00486, 00566, 00601, 00647,

The site is by far the largest to be proposed, and scale of the proposal would suggest that additional scrutiny and consultation with the community would be appropriate. To date this is considered to be inadequate and insufficiently transparent.

### Biodiversity/Natural Environment

#### Objecting

00001, 00020, 00071, 00163, 00164, 00165, 00166, 00167, 00168, 00169, 00170, 00171, 00172, 00173, 00174, 00175, 00178, 00179, 00180, 00181, 00182, 00183, 00184, 00185, 00186, 00187, 00189, 00190, 00191, 00192, 00193, 00194, 00195, 00196, 00197, 00198, 00199, 00200, 00201, 00202, 00203, 00204, 00205, 00206, 00207, 00208, 00209, 00210, 00211, 00212, 00213, 00214, 00215, 00217, 00218, 00219, 00220, 00221, 00222, 00223, 00224, 00225, 00226, 00227, 00228, 00229, 00230, 00231, 00232, 00233, 00234, 00235, 00236, 00237, 00238, 00239, 00240, 00241, 00242, 00243, 00244, 00245, 00246, 00247, 00248, 00249, 00250, 00251, 00252, 00253, 00254, 00255, 00256, 00257, 00258, 00259, 00260, 00261, 00262, 00263, 00264, 00265, 00266, 00267, 00268, 00269, 00270, 00271, 00272, 00273, 00274, 00275, 00276, 00277, 00279, 00281, 00282, 00283, 00284, 00285, 00286, 00287, 00288, 00289, 00290, 00291, 00292, 00293, 00294, 00295, 00296, 00297, 00298, 00299, 00300, 00301, 00302, 00303, 00304, 00305, 00306, 00307, 00308, 00309, 00310, 00311, 00314, 00315, 00316, 00317, 00318, 00319, 00320, 00321, 00322, 00323, 00324, 00326, 00327, 00328, 00329, 00330, 00331, 00332, 00333, 00334, 00335, 00337, 00338, 00339, 00340, 00341, 00342, 00343, 00344, 00345, 00346, 00347, 00348, 00349, 00350, 00351, 00353, 00354, 00355, 00356, 00357, 00358, 00359, 00360, 00361, 00362, 00363, 00364, 00365, 00366, 00367, 00384, 00402, 00420, 00486, 00518, 00566, 00601, 00647

The proposal is contrary to City Plan 2 policies and the policy contained within the Glasgow Local Biodiversity Action Plan, which are designed to prevent the fragmentation or isolation of species. The significance of the area, which is part of the River Kelvin wildlife corridor, is highlighted on the open space map. The area is home to many protected species, including the tree sparrow, which is acknowledged to be scarce and is protected under the Wildlife and Countryside Act 1981 and the EC Birds Directive. The area also provides habitat for other birds and mammals, most of which are protected and some known to be in decline. There is also a variety of plants present in the area. It is a designated green corridor, and links the green oases of Killermont Golf Course with Templehill Wood to St Kentigern's Cemetery.

Large scale development of existing agricultural land north of Summerston will have a significant environmental impact. The green space is of benefit to nearby communities in what is otherwise a highly built up area. Development would be incompatible with an important natural resource in the area, namely Possil Marsh, which is an important nature reserve and Site of Special Scientific Interest, and is vulnerable to polluted run-off. The conservation of the varied wildlife and flora within the reserve and surrounding fields is of



key importance to the City Development Plan.

Scottish Natural Heritage (SNH) comment that allocation of the site for development would not be acceptable due to adverse impacts on landscape character and visual amenity within a Site of Special Landscape Importance is supported. While SNH agreed to the principle of a feasibility study into the potential for development in the wider greenbelt area, this is not an endorsement that development should take place. It is also questionable that any changes to the land use designation should be made to this land in advance of the outcomes of the feasibility study being available.

### Antonine Wall

#### Objecting

00384, 00420 - The development would affect the Antonine Wall, a UNESCO World Heritage site.

### Flooding and Drainage

#### Objecting

00001, 00071, 00163, 00164, 00165, 00166, 00167, 00168, 00169, 00170, 00171, 00172, 00173, 00174, 00175, 00178, 00179, 00180, 00181, 00182, 00183, 00184, 00185, 00186, 00187, 00189, 00190, 00191, 00192, 00193, 00194, 00195, 00196, 00197, 00198, 00199, 00200, 00201, 00202, 00203, 00204, 00205, 00206, 00207, 00208, 00209, 00210, 00211, 00212, 00213, 00214, 00215, 00217, 00218, 00219, 00220, 00221, 00222, 00223, 00224, 00225, 00226, 00227, 00228, 00229, 00230, 00231, 00232, 00233, 00234, 00235, 00236, 00237, 00238, 00239, 00240, 00241, 00242, 00243, 00244, 00245, 00246, 00247, 00248, 00249, 00250, 00251, 00252, 00253, 00254, 00255, 00256, 00257, 00258, 00259, 00260, 00261, 00262, 00263, 00264, 00265, 00266, 00267, 00268, 00269, 00270, 00271, 00272, 00273, 00274, 00275, 00276, 00277, 00279, 00281, 00282, 00283, 00284, 00285, 00286, 00287, 00288, 00289, 00290, 00291, 00292, 00293, 00294, 00295, 00296, 00297, 00298, 00299, 00300, 00301, 00302, 00303, 00304, 00305, 00306, 00307, 00308, 00309, 00310, 00311, 00314, 00315, 00316, 00317, 00318, 00319, 00320, 00321, 00322, 00323, 00324, 00326, 00327, 00328, 00329, 00330, 00331, 00332, 00333, 00334, 00335, 00337, 00338, 00339, 00340, 00341, 00342, 00343, 00344, 00345, 00346, 00347, 00348, 00349, 00350, 00351, 00353, 00354, 00355, 00356, 00357, 00358, 00359, 00360, 00361, 00362, 00363, 00364, 00365, 00366, 00367, 00384, 00402, 00420, 00437, 00486, 00566, 00601, 00647

The area around Caldercuilt Farm is subject to flood risk. A decision on re-designation of the site would be premature in advance of a Flood Risk Assessment, as advised by the Scottish Environment Protection Agency. Development would increase this risk.

Flooding from rainfall is an issue in residential areas and also in non-domestic areas such as Lambhill Cemetery due to inadequate drainage infrastructure. To increase the level of hard standing (through roads, pavements and housing) will in turn increase the level of surface water runoff which can only further increase the level of flooding.

Traffic/Roads InfrastructureObjecting

00001, 00020, 00071, 00163, 00164, 00165, 00166, 00167, 00168, 00169, 00170, 00171, 00172, 00173, 00174, 00175, 00178, 00179, 00180, 00181, 00182, 00183, 00184, 00185, 00186, 00187, 00189, 00190, 00191, 00192, 00193, 00194, 00195, 00196, 00197, 00198, 00199, 00200, 00201, 00202, 00203, 00204, 00205, 00206, 00207, 00208, 00209, 00210, 00211, 00212, 00213, 00214, 00215, 00217, 00218, 00219, 00220, 00221, 00222, 00223, 00224, 00225, 00226, 00227, 00228, 00229, 00230, 00231, 00232, 00233, 00234, 00235, 00236, 00237, 00238, 00239, 00240, 00241, 00242, 00243, 00244, 00245, 00246, 00247, 00248, 00249, 00250, 00251, 00252, 00253, 00254, 00255, 00256, 00257, 00258, 00259, 00260, 00261, 00262, 00263, 00264, 00265, 00266, 00267, 00268, 00269, 00270, 00271, 00272, 00273, 00274, 00275, 00276, 00277, 00279, 00281, 00282, 00283, 00284, 00285, 00286, 00287, 00288, 00289, 00290, 00291, 00292, 00293, 00294, 00295, 00296, 00297, 00298, 00299, 00300, 00301, 00302, 00303, 00304, 00305, 00306, 00307, 00308, 00309, 00310, 00311, 00314, 00315, 00316, 00317, 00318, 00319, 00320, 00321, 00322, 00323, 00324, 00326, 00327, 00328, 00329, 00330, 00331, 00332, 00333, 00334, 00335, 00337, 00338, 00339, 00340, 00341, 00342, 00343, 00344, 00345, 00346, 00347, 00348, 00349, 00350, 00351, 00353, 00354, 00355, 00356, 00357, 00358, 00359, 00360, 00361, 00362, 00363, 00364, 00365, 00366, 00367, 00384, 00402, 00420, 00437, 00486, 00566, 00601, 00647

In contrast to regeneration areas, where public transport is more successfully developed, the roads infrastructure in the area would not support the increased car usage created by the development (including travel to East Dunbartonshire for shopping, recreation and schools which is less sustainable). The speed and volume of traffic on Blackhill Road and Balmore Road are already a cause for concern, and access to this road is already difficult.

The development plan includes proposals for the upgrade of Blackhill Road (Proposal T008). Lack of assurances that the upgrade (first identified in City Plan 1) will proceed before development, risks additional pressure being put on the below-standard Blackhill Road, both through the increased population and construction traffic.

Sustainable CommunitiesObjecting

00001, 00020, 00071, 00163, 00164, 00165, 00166, 00167, 00168, 00169, 00170, 00171, 00172, 00173, 00174, 00175, 00178, 00179, 00180, 00181, 00182, 00183, 00184, 00185, 00186, 00187, 00189, 00190, 00191, 00192, 00193, 00194, 00195, 00196, 00197, 00198, 00199, 00200, 00201, 00202, 00203, 00204, 00205, 00206, 00207, 00208, 00209, 00210, 00211, 00212, 00213, 00214, 00215, 00217, 00218, 00219, 00220, 00221, 00222, 00223, 00224, 00225, 00226, 00227, 00228, 00229, 00230, 00231, 00232, 00233, 00234, 00235, 00236, 00237, 00238, 00239, 00240, 00241, 00242, 00243, 00244, 00245, 00246, 00247, 00248, 00249, 00250, 00251, 00252, 00253, 00254, 00255, 00256, 00257, 00258, 00259, 00260, 00261, 00262, 00263, 00264, 00265, 00266, 00267, 00268, 00269, 00270, 00271, 00272, 00273, 00274, 00275, 00276, 00277, 00279, 00281, 00282, 00283, 00284, 00285, 00286, 00287, 00288, 00289, 00290, 00291, 00292, 00293, 00294, 00295, 00296, 00297,

00298, 00299, 00300, 00301, 00302, 00303, 00304, 00305, 00306, 00307, 00308, 00309, 00310, 00311, 00314, 00315, 00316, 00317, 00318, 00319, 00320, 00321, 00322, 00323, 00324, 00326, 00327, 00328, 00329, 00330, 00331, 00332, 00333, 00334, 00335, 00337, 00338, 00339, 00340, 00341, 00342, 00343, 00344, 00345, 00346, 00347, 00348, 00349, 00350, 00351, 00353, 00354, 00355, 00356, 00357, 00358, 00359, 00360, 00361, 00362, 00363, 00364, 00365, 00366, 00367, 00384, 00402, 00420, 00486, 00566, 00601, 00647

Additional consultation with the community should focus on the need for additional amenities and facilities that are required for any proposed development, as previous developments are only settling in. This could include: provision of schools, community halls, sports facilities, and parks, as well as investment in active travel and public transport to improve access to shopping centres and the City Centre. Placing requests have been refused at the local school due to current high capacities.

### Green Belt

#### Objecting

00001, 00020, 00071, 00163, 00164, 00165, 00166, 00167, 00168, 00169, 00170, 00171, 00172, 00173, 00174, 00175, 00178, 00179, 00180, 00181, 00182, 00183, 00184, 00185, 00186, 00187, 00189, 00190, 00191, 00192, 00193, 00194, 00195, 00196, 00197, 00198, 00199, 00200, 00201, 00202, 00203, 00204, 00205, 00206, 00207, 00208, 00209, 00210, 00211, 00212, 00213, 00214, 00215, 00217, 00218, 00219, 00220, 00221, 00222, 00223, 00224, 00225, 00226, 00227, 00228, 00229, 00230, 00231, 00232, 00233, 00234, 00235, 00236, 00237, 00238, 00239, 00240, 00241, 00242, 00243, 00244, 00245, 00246, 00247, 00248, 00249, 00250, 00251, 00252, 00253, 00254, 00255, 00256, 00257, 00258, 00259, 00260, 00261, 00262, 00263, 00264, 00265, 00266, 00267, 00268, 00269, 00270, 00271, 00272, 00273, 00274, 00275, 00276, 00277, 00279, 00281, 00282, 00283, 00284, 00285, 00286, 00287, 00288, 00289, 00290, 00291, 00292, 00293, 00294, 00295, 00296, 00297, 00298, 00299, 00300, 00301, 00302, 00303, 00304, 00305, 00306, 00307, 00308, 00309, 00310, 00311, 00314, 00315, 00316, 00317, 00318, 00319, 00320, 00321, 00322, 00323, 00324, 00326, 00327, 00328, 00329, 00330, 00331, 00332, 00333, 00334, 00335, 00337, 00338, 00339, 00340, 00341, 00342, 00343, 00344, 00345, 00346, 00347, 00348, 00349, 00350, 00351, 00353, 00354, 00355, 00356, 00357, 00358, 00359, 00360, 00361, 00362, 00363, 00364, 00365, 00366, 00367, 00384, 00402, 00420, 00486, 00518, 00566, 00601, 00647

The continuing erosion of the green belt between Glasgow and neighbouring authorities is a major concern. The area is semi-rural, and provides a valuable landscape buffer between the built-up area and the countryside. The proposal is contrary to the key provisions of City Plan 2 Policy ENV 3, in terms of: integration with the landscape, requirements for high standards of design and appropriate materials, adverse impact on landscape character and residential amenity. Development would also compromise the character or appearance of the green belt, impact on local distinctiveness, affect visual amenity and the enjoyment and recreational use of the countryside, would have a negative impact on water courses, water supply, traffic and access requirements, and increase the risk of pollution"

In these respects, the proposal is not sustainable, is not considered to be best practice, would reduce the quality of life for residents in Summerston, and would reduce access to

the countryside in what is already an intensely built area. It would therefore be contrary to Glasgow City Council and Scottish Government policies. There has been no assessment of the impact that the loss of green belt would have on this community.

#### Landfill Site

#### Objecting

00333 - The existence of the landfill site adjacent to the site indicates that it would be unsuitable for development.

#### Disruption During Development

#### Objecting

00384 - The development would necessitate work that would be severely disruptive to residents.

#### Add Identified Site to Housing Land Supply

#### Objecting

00632 - The green belt review recommended a feasibility study in the Summerston area in relation to environmental, hydrological, infrastructure and housing land supply issues.

A masterplan identified development areas to the north and south of Blackhill Road. A number of associated benefits are also identified: a northern circumferential route, a potential bus route through the site, a neighbourhood centre, land for a potential cemetery extension, new pedestrian links and a green corridor.

A landscape assessment concluded that the area could be released from the green belt with minimal landscape and visual effects, due to the existing development effectively urbanising parts of the Kelvin Valley. With appropriate mitigation and design, the development of the site will:

- Offer substantial visual mitigation and integration of the new development when seen from the north;
- Protect the visual amenity of road users on Balmore Road; and
- Avoid any protected woodlands.

The developer confirms that the existing housing phase has now sold out. The proposed site is in single ownership and can be delivered in the short to medium term. Development will provide the opportunity for effective green belt management.

Caledonian Properties/Taylor Wimpey are keen to be involved in the feasibility study.

#### Land Held by Luddon Construction

#### Objecting

00815 - This representation relates to the interests of Luddon Construction, which is based at Balmore Road, and is adjacent to Proposal H113 Summerston. Luddon

<p>Construction's business is an established heavy engineering and construction plan yard, and is a source of noise and dust. There is concern that the location of residential use, up to and surrounding the business on three sides, could lead to complaints regarding noise, dust, out of hours working and heavy vehicle movements. Such complaints would be dealt with by established Environmental Health legislation, and there is concern that any restriction imposed may be detrimental to the continuation of the business and employment at this location.</p> <p>While not opposed in principle to residential development, Luddon Construction proposes two options to mitigate the concerns expressed. Option 1 (preferred) - although there are no plans to relocate the business, inclusion of this land within the release proposal would allow for long-term relocation planning and resolution of the conflicts caused by neighbouring land uses. Option 2 - Delete Proposal H113 unless appropriate conditions and restrictions are imposed to ensure a 100m wide buffer zone (together with earthwork screen bunds and tree planting) between the future residential land and the boundary of the land owned by Luddon Construction.</p>
<p><b>Modifications sought by those submitting representations:</b></p> <ol style="list-style-type: none"> <li>1. Delete housing proposal H113 (Summerston) from the Policy and Proposals Map.</li> <li>2. Retain the area that is the subject of this representation as Green Belt.</li> <li>3. Modify Policy CDP10 to remove reference to this site.</li> </ol> <p>00632 - Include the areas identified within the masterplan attached to this representation as a proposal for housing, along with the proposed northern circumferential route.</p> <p>00815</p> <ol style="list-style-type: none"> <li>1. Include the land holding of Luddon Construction (approximately 12 acres) in the release of land for residential use, or</li> <li>2. Deletion of Proposal H113 from the Policy and Proposals Map unless appropriate conditions and restrictions are imposed as noted above.</li> </ol>
<p><b>Summary of responses (including reasons) by planning authority:</b></p> <p><u>Green Belt Review</u></p> <p>This part of the green belt was assessed through the city-wide Green Belt Review. It was concluded that there was potential for development within Zone 7.3 and the western part of Zone 7.2 (OC46, paragraph 7.15). The review recognised, however, that there were significant issues which needed further consideration through a feasibility study. The comments from SNH on the green belt review will inform the feasibility study which is to be undertaken.</p> <p><u>Scottish Planning Policy</u></p> <p>The feasibility study will consider whether there is any capacity for housing development within this location. Should any proposal emerge from this study, the developer would have to consider how the development might be integrated into the wider green network, in compliance with Policy CDP 6: Green Belt and Green Network, and associated Supplementary Guidance.</p>

## City Plan 2/Main Issues Report

The Main Issues Report preference for brownfield sites has been carried forward to the Proposed Plan, as noted in Policy CDP 2: Sustainable Spatial Strategy, page 34, bullet point 7. A preference for brownfield sites does not mean the exclusion of development on greenfield sites. SPP requires authorities to maintain a 5-year supply of effective housing land supply at all times. Where a 5-year supply is not provided, SPP expects authorities to allocate sites to make up any shortfall. While the Council has questioned the basis for the housing requirements set out in the SDP, on the basis of the changed housing market, it was considered appropriate to consider the need to identify additional sites through a city-wide green belt review.

## Feasibility Study

The housing land context for the proposed feasibility study is addressed in full in the response to Homes for Scotland.

The Proposed Plan identified Proposal H113 as a result of the green belt review, which indicated areas where there was potential for housing, and also concluded that no housing development was feasible to the east of Balmore Road. Examination of the area indicated that there were infrastructural, hydrological and environmental issues which would have to be considered in assessing whether any development was feasible, and it was concluded therefore the site should not be shown as an addition to the housing land supply (see table in Policy CDP 10) until the feasibility study had been concluded. The status of the site in the CDP remains greenbelt, subject to the outcome of the feasibility study. Depending on the result of this process, any proposal would have to be assessed against appropriate CDP Policy and associated Supplementary Guidance.

Inclusion in the Proposed Plan is consistent with paragraph 78 of Circular 6/2013 (CE11), which requires the Proposed Plan to identify opportunities for development. The identification of this site does not prejudice the outcome of the feasibility study, but does give the community, investors, and other interested parties information on the potential for housing in this location. The site could not be included in Supplementary Guidance, as is made clear in the Circular, which states that “developments of more than local impact” should be included in the Plan. While the extent of any housing development is not known, the Council considered that it would be preferable to make this possibility transparent. A landscape capacity assessment would be included in the feasibility study.

## Potential Additional Sites Consultation

The Council considered all responses to this consultation in preparing the Proposed Plan, which was approved by the Executive Committee in April 2014. The site was included in the Proposed Plan at this stage.

## Strategic Development Plan/Housing Land Supply

In terms of the position that was expressed at Main issues Report, and the position that is now shown in the Proposed Plan, evidence from private sector housing completions from 2008/09 – 2013/14 (OC19) indicates that the market downturn that has been apparent since 2008 has continued. This has led to a growing shortfall between the housing requirements set out in the SDP and the identified housing supply. The selection of this location for a feasibility study is intended to allow the consideration of whether there is

any potential for this site to contribute to the shortfall.

Should any site be identified as a result of the feasibility study, there is no indication that it would not meet the effectiveness tests set out in PAN 2/2010: Affordable Housing and Housing Land Audits (CE5). The Council has stated that it expects the Community Growth Areas to contribute to meeting the City's housing requirements. In addition to these sites, however, it was considered necessary to identify other sites and potential locations.

#### Scale of Land Release/Consultation

The consultation requirements for Local Development Plans are set out in paragraph 83 of Circular 6/2013 (CE11). These apply to any proposal equally, regardless of scale, and have been complied with by the Council. Should the feasibility study identify a site of more than 50 houses, it would be considered a major development in terms of the Planning etc. (Scotland) Act 2006, and would therefore require the submission of a Pre Application Notice. This would give the local community formal notice of the start of a pre-application consultation process, which could include the consideration of the need for additional community facilities and amenities, as well as investment in active travel and public transport.

#### Biodiversity/Natural Environment

The purpose of the feasibility study is to assess whether there is any potential for housing development, taking account of the various environmental, hydrological and infrastructure issues that affect the area. Issues relating to biodiversity, environmental designations and landscape will fall within the scope of the study, and will require to be fully considered in reaching a conclusion on this location. Any proposal that emerges from this study would also have to comply with Policy CDP 7: Natural Environment and associated Supplementary Guidance.

#### Antonine Wall

Any proposal would have to comply with Policy CDP 9: Historic Environment and associated Supplementary Guidance. It is noted that the site identified in the Proposed Plan does not fall within the protected area described as the Antonine Wall Buffer Zone.

#### Flooding and Drainage

Flooding and drainage issues will fall within the scope of the feasibility study. All development is required to be drained effectively, in compliance with PAN 61: Planning and Sustainable Drainage Systems.

#### Traffic/Roads Infrastructure

The capacity of the local roads infrastructure to accommodate development will be considered through the feasibility study. It is accepted by the developer that investment in roads infrastructure will be necessary to accommodate housing development. The timing of this will be a matter for consideration between the developer and the Council.

Sustainable CommunitiesSee above under Scale of Land Release/ConsultationLandfill Site

The presence of the landfill site is not considered to be a relevant factor in determining whether the adjacent area is capable of being developed.

Disruption During Development

It is accepted that all development causes disruption to some extent. Any planning permission would include conditions that are designed to ensure that any disruption is minimised.

No modifications recommended.

Add Identified Site to Housing Land Supply

00632 - The purpose of identifying the area which is the subject of this representation for a feasibility study is to consider the various environmental, hydrological and infrastructure issues that could affect the site, and to assess whether there would be any potential for additional housing development within a smaller area. Although the commentator has provided a large amount of information to support the proposal, this would have to be considered by the Council through the feasibility study.

City Plan 2 (CE17, para 6.16) indicated that a feasibility study relating to the proposed northern circumferential route would be undertaken, as it was recognised that this route had the potential to affect various environmental assets, as well as the landscape and hydrology in this area. This study has not yet been undertaken, and will therefore be incorporated within the wider examination of the area relating to the potential for additional housing (see Policy and Proposals Map for site H113 and feasibility study area).

In view of the requirement to do further work in this area, it would be inappropriate to identify the site for housing or the northern circumferential route until the outcome of this study is known.

No modifications recommended.

Land Held by Luddon Construction

00815 - Proposal H113 reflects the boundary of a site submitted through the City Development Plan process in response to the Main Issues Report consultation. It is intended to show the boundary of an area identified by the green belt review as requiring further consideration as to whether it has potential for housing. The site which is the subject of this representation was not submitted to the Council at any stage in the City Development Plan process, and therefore was not considered in the green belt review. However, the Council would have no objection to the site being incorporated in the feasibility study.



The Reporter could, if so minded, amend the Plan to incorporate the site which is the subject of this representation in the proposed feasibility study.

### **Reporter's conclusions:**

1. The majority of representations seek removal of Housing Proposal H113 and retention of the green belt designation. Site H113 is shown on the proposals map as being a proposed addition to the housing land supply set within a wider Feasibility Study Area.

#### Greenbelt Review 2014

2. The area was subject to a Comprehensive Planning Study in 2005. This identified land west and east of Balmore Road (zone 7.2) in Area C as having scope for development, one of 3 such areas (the others being zones 7.1 and 7.3) in the green belt at Summerston. The green belt review considered that there may be scope for development in zone 7.3, and potentially the western part of zone 7.2, if the feasibility study determines that the environmental issues can be satisfactorily addressed when considered in conjunction with the impacts of a potential north circumferential route, should it be deemed feasible and desirable.

3. A response to the review by landscape architects on behalf of Caledonian Properties Ltd concluded that, subject to appropriate masterplanning, the development site being promoted (entirely west of Balmore Road) could be released from the green belt for residential development with only minor long term residual effects upon visual amenity and wider landscape character. Nevertheless, this would be a matter for further assessment as part of the feasibility study.

#### Scottish Planning Policy and access to open space

4. Representations consider that the proposal is contrary to the objectives of Scottish Planning Policy (SPP) regarding access to open space around the city. Paragraph 219 of SPP advises that National Planning Framework 3 aims to significantly enhance green infrastructure networks, particularly in and around our cities and towns. Also green infrastructure and improved access to open space can help to build stronger, healthier communities. The council has indicated that, should any proposal emerge from the feasibility study, the developer would have to consider how the development might be integrated within the wider green network. Nevertheless, I consider that the council would need to have regard to the advice on placemaking in SPP and need for accessible open space.

#### Feasibility Study

5. East Dunbartonshire Council considers that land should not be released from the green belt regardless of the outcome of the feasibility study because it would compromise the principle of maintaining a compact city region. Scottish Natural Heritage supports the feasibility study but considers that there is limited housing potential. It considers that it is premature to show a housing allocation on a proposals map at this stage and instead any housing allocation should be included in supplementary guidance once the feasibility study has been undertaken. The council has confirmed that the status of the site in the Proposed Plan remains green belt, subject to the outcome of the feasibility study. I consider that it is reasonable for the council to undertake a feasibility study to identify

potential housing development sites at this location further to the assessment contained within the council's green belt review. It is also reasonable for the council to indicate part of the study area as a proposed addition to the housing land supply.

6. In Issue 17 above we concluded that there will be a shortfall in the housing land supply during the Proposed Plan period. This cannot be met by brownfield sites alone. It is imperative that the council makes rapid progress with the feasibility study with a view towards confirming areas that are suitable and effective for housing development in the Proposed Plan period.

#### Potential additional sites consultation

7. The council has confirmed that all responses to the additional sites consultation were considered in preparing the Proposed Plan. The site was included in the Proposed Plan, as approved by the council's Executive Committee in April 2014. Consequently, I find that the change in the policy regarding green belt release at Summerston has been properly considered by the council.

#### Main Issues Report/Strategic Development Plan/housing land supply

8. We address the issue of meeting housing needs in the City elsewhere in this report at Issue 17. However, representations in relation to the current issue refer to the Main Issues Report which included the strategy of re-using brownfield land as opposed to greenfield land. Policy CDP2: Sustainable Spatial Strategy of the Proposed Plan seeks to ensure that brownfield land is utilised in preference to greenfield sites. However, it is clear from the context for Policy CDP10: Meeting Housing Needs that there are insufficient effective brownfield sites and that greenfield locations are required to meet the shortfall in housing land supply. This includes those sites identified as opportunities in the greenbelt review, including Summerston. The council has been unable to identify sufficient effective brownfield sites to meet the housing requirement for the Proposed Plan period. It also cannot demonstrate that it will have a rolling five-year housing land supply in line with Scottish Planning Policy. This change in circumstances is the reason why the "cornerstone" policy of City Plan 2 of opposing the use of greenfield land has been amended.

#### Scale of land release/consultation

9. Representations consider that due process may have been followed in developing the draft plan, but the local community does not feel that it has been adequately consulted on what could be a very significant development. The Proposed Plan indicates that the council proposes to undertake a feasibility study to examine environmental, hydrological and infrastructure issues in the larger area shown within the green belt to the north of Summerston (on the Policy and Proposals Map) and to assess the potential for additional land supply within the smaller area highlighted as H113. The council has advised that pre-application consultation would be needed for any housing proposals that arise with more than 50 housing units. For smaller scale developments I would expect the council to carry out neighbour consultations in line with its standard development management procedures.

#### Biodiversity/natural environment

10. Reference is made to the Glasgow Local Biodiversity Action Plan and the green

corridors formed by the River Kelvin and dismantled railway. Protected species in the area include otter, bats and the tree sparrow which has a population at East and West Millichen Farms. Other species are mentioned using the land between the river and Possil Marsh Site of Special Scientific Interest. The Royal Society for the Protection of Birds has submitted that the boundary of housing development should be separated from the River Kelvin by a 50 metre buffer zone to protect the wildlife corridor.

11. The council has confirmed that issues relating to biodiversity will fall within the scope of the feasibility study and will require to be fully considered in reaching a conclusion on the location of any potential development. I would expect this to be based upon ecological surveys and species records for the area, plus consultation with Scottish Natural Heritage and the Royal Society for the Protection of Birds. In addition, proposals would have to be assessed against Policy CDP7: Natural Environment, of the Proposed Plan and any relevant supplementary guidance.

#### Antonine Wall

12. The site is located well to the south of the route of the Antonine Wall itself. Its northern most points are adjacent to the World Heritage Site buffer zone, with the River Kelvin partly marking the boundary. The council will need to ensure that the feasibility study assesses the potential impact of any development proposals on the setting of the Antonine Wall.

#### Flooding and drainage

13. Representations raise concerns regarding the risk of flooding relating to the River Kelvin and minor watercourses. It is submitted that flooding is a real issue for the community with residential areas and Lambhill Cemetery suffering from surface run-off because of the topography and inability of the drainage infrastructure to cope with high levels of rainfall.

14. Balmore Road is also prone to flooding and I am informed that when there is intense rainfall it is closed regularly. Recently both Sandbank Street and Balmore Road were closed because of flooding, causing congestion for traffic using Caldercuilt Road as an alternative route out of the village.

15. The council has confirmed that flooding and drainage issues will fall within the scope of the feasibility study and that all development is required to be drained effectively, in compliance with Planning Advice Note 61: Planning and Sustainable Drainage Systems. SPP also advises that local development plans should use the flood risk framework to guide development.

#### Traffic/roads infrastructure

16. I observed at my site inspection that Blackhill Road is narrow and lacking footways. It already carries a significant amount of traffic, including that generated by recent housing in Summerston. The representations make the point that improvement to the road was intended to follow the completion of development previously proposed in City Plan 1 and that there is no assurance that an upgrade to the road would be completed prior to any further development, with increased pressure being put on the use of the sub-standard road.

17. The council has advised that the capacity of the road network would be considered as part of the feasibility study. It adds that the timing of road improvements will be a matter for consideration between the council and developer. However, local residents clearly have concerns about the condition and use of Blackhill Road. In my opinion, the feasibility study should make clear how any proposed additional housing development and required improvements to Blackhill Road are to be timed and phased, having regard to convenience for existing residents and highway safety.

#### Sustainable Communities

18. The representations seek an assurance about how amenities will be factored into any development within the site and how facilities such as schools, community halls, sports facilities and parks will be provided for. An indication is also requested of how all residents can have safe and easy access to the city centre and community facilities.

19. Clearly the provision of community facilities and improved public transport would depend upon the scale of any development envisaged through the feasibility study and availability of private and public sector funding. The council has advised that pre-application consultation for any development sites with greater than 50 units would provide an opportunity for considering these matters. However, I consider that the feasibility study should include an overall assessment of the provision of public transport and community facilities, including educational provision, in relation to any development proposals that may be identified in the study area.

#### Landfill Site

20. The Greenbelt Review plan for Summerston sector 7 indicates the presence of a landfill site located immediately to the north of the central part of the proposed area for the feasibility study. The council indicates that the landfill site is not considered to be a relevant factor in determining whether the adjacent area is capable of being developed. That statement is not evidenced by any technical information. Landfill gas migration and leachate pollution can be associated with closed landfill sites. Given the proximity of the landfill site I would expect any potential impact from the landfill site on the adjacent land and wider site to be thoroughly assessed as part of the feasibility study.

#### Disruption during development

21. Concerns are raised regarding the effect of any development on the living conditions of existing residents. Nevertheless, it is possible for the council to impose conditions on a planning permission, if it is reasonable and necessary, to control hours of construction, require wheel washing for construction vehicles using the roads and to require a construction management plan. This can help to reduce the environmental impact of housing construction near to existing dwellings.

#### Add identified site to housing land supply

22. City Plan 2 indicated that a feasibility study for a northern circumferential route would be undertaken. I agree that it would be inappropriate to identify the route or identify the site for housing until the Summerston feasibility study has been undertaken.

Land held by Luddon Construction

23. Luddon Construction's site is located next to the north-eastern part of the site with access from Balmore Road. This is a developed site which has operational uses with potential environmental impacts for any residential development that would have to be taken into account in the feasibility study. Mitigation could involve the use of a buffer zone, as suggested in the landowners' representation as option 2. Although the company has expressed no intention to relocate the business, its first option suggests including the site within the 'release proposal' to allow for longer term planning and resolution of any conflicts. I consider that this option would be preferable given the nature of the business, although the company's site would have to be included in the area of the proposed addition to the housing land supply (H113) as in the Proposed Plan, as H113 is not strictly a 'release proposal'. The Proposed Plan should be modified accordingly.

Overall conclusions

24. Taking all matters raised into account, I conclude that housing proposal H113 should be retained as a proposed addition to the housing land supply. The council's urban capacity study (2013) indicates potential for an additional 700 houses at Summerston, the bulk of which could be delivered in the plan period. This can only be an estimate, as the exact numbers and locations will be subject to the findings of the feasibility study. In view of the shortfall in the housing land supply, the wider feasibility study for the Summerston area should be given priority by the council. This will enable the council to establish which land is suitable for development and the potential infrastructure and phasing of development that will be required.

**Reporter's recommendations:**

Modify the Proposals Map to include the land occupied by Luddon Construction within proposed addition to the housing land supply H113.

<b>Issue 44</b>	<b>Housing Proposal H114 Cathkin Road, Carmunnock</b>	
<b>Development plan reference:</b>	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	<b>Reporter:</b> Martin Seddon
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<div> Tommy Millar (00016)  Alistair Trainor (00028)  Scott Collins (00030)  Helen Wilkes (00033)  Andrea Sheppard (00034)  Tom Cuthbertson (00037)  Irene Melville (00038)  Sheila Hope Preston (00039)  Ian M H Preston (00040)  Beatrice W H Herbert (00041)  Marion Begg (00046)  John Wilkes (00048)  Leslie Brown (00050)  Sheila Brown (00051)  Sharn L Jaffe (00054)  David Jaffe (00055)  James McCreadie (00056)  A L Ogilvy (00057)  John Kinloch (00063)  K McCready (00064)  William Wilson (00066)  Mary Munn (00068)  Matt Smith (00070)  Elspeth Hamilton (00075)  Joan Middleton (00080)  Ross Drummond (00081)  Anna Wilson (00082)  Catherine McLachlan (00084)  Peter MacLachlan (00085)  J Telford George (00088)  Ross A Belch (00089)  William Baird (00090)  Gillian Paterson (00091)  John Cusack (00092)  James D Campbell (00093)  Anne W W Campbell (00097) </div> <div> Ann Carmichael (00098)  James D Campbell (00093)  Anne R Belch (00099)  Margaret E Filer (00100)  Emma Graham (00103)  M J Toppin (00105)  Sena Christie (00106)  K McCready (00107)  Mary T Donnelly (00109)  Lynsey Graham (00113)  Gordon Graham (00114)  Tom Morton (00139)  Anne Rait (00157)  George M Hunter (00158)  John Hardie (00160)  Thomas McGarvey (00441)  Keri Frew (00458)  Jeanette George (00511)  Neil McKechnie (00512)  Grant Maynard (00517)  Anne-Marie Carr (00519)  Emma Carr (00526)  Edward Carr (00527)  Eilish Carr (00528)  Sacha Strandberg (00530)  Stewart Milne Homes (00558)  Lorraine Cochrane (00581)  Moirra McCracken (00595)  James Connolly (00616)  James Dornan MSP (00645)  Sarah Currie Jones (00649)  Alexander Devers (00654)  Robert Cochrane (00661)  Peter Finch (00814)  M Hanlon (00819) </div>		
<b>Provision of the development plan to which the issue relates:</b>	Cathkin Road, Carmunnock is one of three sites identified through the City-wide Greenbelt Review in relation to the shortfall in private sector housing land supply at 2020. The site has an indicative capacity of 30 units.	

**Planning authority's summary of the representation(s):**GeneralObjecting

00530 - I would like to see the proposed plan for houses on former greenbelt refused.

Site Includes Communally Owned LandObjecting

00016, 00028, 00084, 00091, 00595 - The proposal site includes land that is owned communally by the residents of Cameron Crescent. Specifically the land which is at the edge of the proposed site where it meets Cameron Crescent and is fenced off at the field. Having this area included in the plans has caused the residents great concerns, and they would appreciate some clarification as to why it appears on the development plan.

City Development Plan Sustainable Spatial StrategyObjecting

00103, 00114, 00819 - The proposal significantly undermines the Sustainable Spatial Strategy in terms of its aims: preference for brownfield sites over greenfield, re-use of vacant and derelict land, green belt and green network objectives, support for higher residential densities in sustainable locations, and historic and natural environment.

Council Policies and StrategiesObjecting

00016, 00028, 00030, 00033, 00034, 00037, 00039, 00041, 00046, 00048, 00054, 00055, 00056, 00057, 00063, 00064, 00066, 00070, 00075, 00080, 00081, 00082, 00084, 00085, 00088, 00089, 00090, 00091, 00097, 00098, 00099, 00100, 00103, 00105, 00106, 00107, 00113, 00114, 00158, 00441, 00458, 00511, 00512, 00517, 00581, 00649, 00654, 00661, 00819

The site is green belt, and is included in the Cathkin Braes Country Park, the Big Wood and Coulters Wood. It is a priceless cultural, educational, environmental and recreational asset to the community, including for elderly people who particularly value the environment. Development would be contrary to other policies in the City Development Plan, specifically Green Belt and Green Network, which states that "The council will not support development that would adversely affect the function and integrity of the Green Belt." The Council should consider brownfield vacant and derelict sites before green belt. Scottish Government and Glasgow City Council both place priority on directing development away from green belt land. Development of green belt land would make Carmunnock just another suburb of Glasgow, and should be resisted.

The proposal is contrary to the fundamental aims of green belt policy, including preventing urban sprawl, providing opportunities for recreation, enhancing the landscape setting of settlements, and encouraging regeneration. The green belt between Carmunnock and East Kilbride would be significantly narrowed if the site were developed.

Development would also be contrary to the wider objectives of the City Development Plan on care for green and historic environments, and for regeneration and investment in key housing areas.

### City Plan 2/Housing Land Supply

#### Objecting

00030, 00033, 00034, 00037, 00038, 00048, 00054, 00055, 00056, 00057, 00063, 00064, 00066, 00070, 00082, 0084, 00085, 00089, 00090, 00091, 00098, 00099, 00100, 00103, 00105, 00107, 00109, 00113, 00139, 00512, 00519, 00526, 00527, 00528, 00581, 00595, 00616, 00649, 00661

City Plan 2 concluded that release of this site was not justified on environmental, heritage and public transport grounds. It is not clear what has changed in such a short space of time.

City Plan 2 also concluded that there was no requirement for more housing land supply until 2025. The proposed housing is not suitable for the need in the area, which is for smaller homes.

### Natural Environment/Biodiversity

#### Objecting

00016, 00028, 00030, 00033, 00034, 00038, 00046, 00048, 00055, 00056, 00057, 00064, 00068, 00070, 00084, 00085, 00088, 00090, 00091, 00099, 00100, 00103, 00105, 00113, 00441, 00458, 00519, 00526, 00527, 00528, 00595, 00649, 00654, 00814

There is a variety of wildlife in the area, including sparrowhawks, deer, bats and a falcon. The site is extremely wet and marshy, and is also home to frogs and toads. The landscape and environment of the area would change. Development would have an adverse impact on the wildlife in Coulters Wood, and it is understood that SNH have raised concerns about the proposal.

### Privacy/Views/Value of House

#### Objecting

00016, 00028, 00458, 00517, 00654, 00814

The proposed development would visually dominate the village due to the site being on higher ground. Cameron Crescent is at the bottom of a 15 foot cliff, which would mean that the proposed houses would overlook back gardens and rear bedroom windows. This would greatly encroach on privacy.

The proposal would result in a permanently changed outlook from a house adjacent to the site, i.e. from an unspoiled view of a rural landscape to one of an urban, built-up landscape. This would affect the value of the property.



Conservation Area/Loss of Village AtmosphereObjecting

00016, 00028, 00030, 00033, 00034, 00037, 00038, 00040, 00048, 00054, 00055, 00056, 00057, 00064, 00066, 00068, 00075, 00080, 00081, 00082, 00084, 00085, 00088, 00089, 00090, 00091, 00092, 00093, 00097, 00098, 00099, 00100, 00103, 00105, 00106, 00107, 00113, 00114, 00139, 00157, 00158, 00441, 00458, 00512, 00519, 00526, 00527, 00528, 00581, 00595, 00616, 00645, 00649, 00654, 00661, 00814, 00819

Carmunnock is the last rural village in Glasgow, and has a unique village atmosphere which has been changing. It is an active village community, and is popular with visitors. There is concern that development would enlarge the village and further change its rural heritage and conservation character, and to erode the amenity of Carmunnock and Castlemilk. Two roads have already been altered, and a third would be changed if the proposal goes ahead. Development would also set a precedent for others, thereby ruining Glasgow's only village.

Conservation Area designation is intended to maintain the setting and integrity of the area, and enhance its special character. This status does not mean that development is unacceptable, but that development should not harm the character or appearance of the area. The residents consider that the Conservation Area status was not given sufficient consideration in the previous very large development at Picketlaw, and this gives concern over the Council's consideration of the current proposal.

Any development should be in keeping with the standards that apply to the Conservation Area, and housing should be kept away from the designated area at Cameron Crescent. The residential amenity of the site may be compromised by its proximity to other housing.

Quiet AreaObjecting

00034, 00037, 00054, 00055, 00057, 00068, 00082, 00084, 00090, 00098, 00105, 00113, 00595, 00649, 00661 - Carmunnock has been designated a quiet area by Glasgow City Council.

Infrastructure/Traffic/Noise and DisturbanceObjecting

00016, 00028, 00046, 00050, 00051, 00064, 00068, 00093, 00098, 00103, 00105, 00107, 00114, 00139, 00157, 00158, 00458, 00512, 00441, 00517, 00519, 00526, 00527, 00528, 00616, 00654, 00814, 00819 - Previous proposals indicated that the water supply for the area was inadequate, and no proposals have been put in place to upgrade it. Drainage and traffic/ road safety for children walking to school are also issues in the village. The village will not be able to support any further development. Public transport and provision for education is currently inadequate.

The proposal could cause increased traffic, noise and disturbance during construction.

Current Use/SustainabilityObjecting

00048, 00057, 00088, 00089, 00160, 00511, 00512, 00581, 00616, 0661 - The site is in agricultural use, development would mean that there would be less grazing land for farmers. Loss of this land may make dairy farming at Parklea Farm unviable. The land contributes to meeting the obligations of the Climate Change Act in terms of carbon emission reduction, and also to food sustainability.

ConsultationObjecting

00068, 00109, 00441, 00458 - No notification of the proposal was received. Views of objectors were ignored the last time housing was proposed.

Justification for DevelopmentObjecting

00038, 00092, 00109, 00441, 00458, 00512, 00581, 00819 - The main justification for the proposal appears to be the high prices and high Council tax that will be generated. The houses will not be affordable for most of the growing population, and will not provide housing for elderly people. The change to village life is not justified by the monetary gains that are suggested.

Alternative Land for HousingObjecting

00103 - Land added to the green belt which was previously identified as vacant in Castlemilk could be used for development, rather than green belt land.

Design SolutionObjecting

00819 - Should the decision be taken to approve development, a design competition should be required, in order to ensure the best design solution for the site context.

Extent of SiteObjecting

00558 - Although supportive of the inclusion of this site, the extent of the site identified is not consistent with the site shown in maps 3, 4 and 5 of Appendix 2 attached to the representation by Stewart Milne. Inclusion of the full site would allow: appropriate access to be created, achievement of a SUDS solution, inclusion of a visitors car park for Coulter's Wood, and the development to be set in an appropriate landscape framework. These are considered to offer more community benefits and increased opportunities for biodiversity.

The development is considered to be a logical extension to the urban area. A landscape capacity assessment confirms that the area has capacity for development, without affecting landscape character.

SNH comments that careful design would be required, that there would be no loss of green belt functionality, and on the role of the south east corner of the site are supported. Proposals for woodland planting to the green belt edge are also supported. It is not clear whether the proposed mitigation has been taken account of by SNH in comments on the Green Belt Review.

Proposals contained within the masterplan would address the following matters: augmentation of the existing woodland framework, boundary treatment, protection of skyline, improved visitor facilities, a robust, attractive built edge to Carmunnock, and appropriate landscape mitigation.

Site access can be satisfactorily accommodated within the extended site, and the proposals would improve operational and safety aspects of the road network. Public transport provision is sufficient to accommodate the development.

### Background Paper 13

#### Objecting

00661 - Disagrees with conclusion that potential for green belt release be fully explored. A generous land supply can be provided by brownfield sites.

Para 4.4 is contradictory in stating that the release is due to a downward revision of the land supply due to the economic downturn. If there is an improvement in the economy, presumably the land supply will be revised upwards, thereby removing the need for release.

Para 3.8 – Disagrees with statement that changes to the land supply situation has necessitated a re-appraisal of the green belt. Considers that Council is simply accepting Scottish Government view that greenfield land needs to be built on.

### **Modifications sought by those submitting representations:**

All above objections except 00558:

1. Delete housing proposal H114 (Cathkin Road) from the Policy and Proposals Map.
2. Retain the area that is the subject of this representation as Green Belt.
3. Modify Policy CDP10 to remove reference to this site.

00558 - The designation of the site identified in the Proposed Plan should be amended to reflect the boundary shown in plans 3, 4 and 5 of Appendix 2 of the representation made by Stewart Milne.

### **Summary of responses (including reasons) by planning authority:**

#### Site Includes Communally Owned Land

The site identified in the Proposed Plan was based on a representation submitted by the

developer, but has been amended by the Council to reflect the area considered to be appropriate for development, taking into account the need to consider the green belt. A further submission by the developer indicates that the site they wish to develop is entirely within the control of the landowner that they represent.

### City Development Plan Sustainable Spatial Strategy

This matter is addressed in the response to Issue 43.

### Council Policies and Strategies

The site is adjacent to, but does not lie within Cathkin Braes Country Park, Big Wood or Coulter's Wood. The city-wide green belt review (see Document 8) concluded that the site had the potential to contribute to the land supply shortfall in Glasgow, but that mitigation, in the form of woodland planting, would be required in order to maintain a strong green belt edge.

Comments from Scottish Natural Heritage (SNH) in response to the Potential Additional Sites Consultation of October 2012 (OC81, Site Ref 0054) noted that significant loss of green belt functions would be unlikely as a result of development of the site. However, SNH did recommend that the south east corner of the proposal site be excluded from the proposal, in view of its "more prominent role in the village's landscape setting." The boundary of the site included in the Proposed Plan has been amended to reflect SNH's concern.

### Natural Environment/Biodiversity

The site is not identified as a Site of Importance for Nature Conservation or as a Corridor of Wildlife Landscape Importance in City Plan 2. In response to the Potential Additional Sites Consultation, SNH has not commented on any matters relating to wildlife or nature conservation. Should there be any evidence of protected species on the site, there would be a requirement to meet the terms of Policy CDP 7: Natural Environment and associated Supplementary Guidance in assessing any proposal.

### Privacy/Views/Value of House

In relation to privacy, the Plan contains policies which operate at a strategic, City-wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan, but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan.

This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption.

The points relating to views or property values are not planning related matters.

### Conservation Area/Loss of Village Atmosphere

The proposal site is adjacent to the Conservation Area. Any detailed proposal would have to comply with relevant City Development Plan Policy and Supplementary Guidance. It is argued that the relatively small scale of development proposed would not be sufficient to significantly alter the village atmosphere.

Quiet Area

Carmunnock is not identified as a Quiet Area (CE8, Map 2: The Spatial Policy Framework).

Infrastructure/Traffic/Noise and Disturbance

Matters relating to connection to the water supply, drainage and roads access would be addressed as part of a detailed planning application. Consultation with the Council's transport policy team indicates that public transport accessibility is acceptable. In terms of education provision, Education Services advises that there is unlikely to be a capacity issue at the local schools in the area.

The potential for increased traffic, noise and disturbance during construction could apply to any development. Any planning permission would contain conditions designed to ensure that the disruption is minimised.

Current Use/Sustainability

In order to be proposed for development, it is assumed that the site has been considered by the landowner to be surplus for agricultural and food production purposes. Any development would be required to be undertaken in accordance with best practice on climate change impact, including the implementation of sustainable urban drainage systems and the use of construction materials. Policy CDP 5: Resource Management and associated Supplementary Guidance sets out the Council's approach on this issue.

Consultation

Proposals for housing on this site were the subject of consultations at both the Main Issues Report stage in September 2011, and a further Potential Additional Sites Consultation in October 2012. The responses to these consultations were considered in identifying additional housing sites for the Proposed Plan.

Justification for Development

Matters relating to generating profit for the developer and additional Council Tax are not planning related matters. The site has been identified for owner-occupied housing as a result of the developer that is associated with the proposal. The tenure of the housing is not a matter for consideration of this proposal.

Alternative Land for Housing

The Green Belt Review (OC46) identified land in Castlemilk that was considered to be appropriate to include in the green belt. The specific intention of its identification was to ensure that it contributed to the purposes of the green belt, rather than meeting the City's housing needs.

No modifications proposed.

Design Solution

It would be for the developer to consider the most appropriate design for the site, taking

into account the local context.

No modifications proposed.

#### Extent of Site to South East

The site identified as Proposal H114 in the CDP is intended to represent the extent of the housing opportunity, as a result of the assessment undertaken for the green belt review and comments from Scottish Natural Heritage. The relevant extract of the green belt review (OC46) can be found at S3.6 – S3.8.

In summary, the review concludes that development of the higher land in the south-eastern part of the site identified as Proposal 0054 in the Development Plan Revised Environmental Report (CE9), would have an unacceptable impact on the landscape setting of the village, and should be excluded from the proposal. The request to include the full extent of Proposal 0054 in the CDP is therefore rejected.

No modifications proposed.

#### Extent of Site to North East

In relation to the land to the north east of Proposal H114, it is accepted that this could provide visitor car parking for Coulters Wood. Provided this amendment is restricted to the delivery of visitor parking and does not adversely impact on existing access routes, it would not raise issues of significance in relation to the principle of development of the site.

The Reporter could, if so minded, amend the boundary of Proposal H114 to include the area to the north east (south of Cathkin Road) for visitor parking for Coulters Wood. (OC105)

#### Background Paper 13

This matter is addressed in response to Issue 43.

### **Reporter's conclusions:**

#### General

1. Carmunnock is located at the southern edge of Glasgow, set within the green belt. It is described in representations as the last 'conservation village' in Glasgow.
2. The site at Cathkin Road was identified through the council's Greenbelt Review. It was considered that the field immediately adjoining the eastern edge of the village (to the east of Cameron Crescent and the northern part of Cragwell Park) offered scope for limited housing development. The Main Issues Report had indicated that release for housing on this prominent site (Proposal 0015) was not justified due to environmental, heritage and public transport considerations, and that it should remain green belt. The accompanying Strategic Environmental Assessment highlighted that the site's green belt status was a key consideration in this respect. However, the change in the housing supply situation across the City necessitated a reappraisal of the green belt. It was considered in the review that this site had the potential to make a small contribution to the

shortfall in supply.

3. The review advised that: *“to be acceptable in landscape terms, development on this site will require to provide a strong green belt edge in the form of woodland planting, helping to mitigate its impact when viewed from the north. The site has an indicative capacity of 30 units, but will require careful design to ensure it respects the adjacent conservation area and to address other placemaking concerns, including safe access onto Cathkin Road. In such circumstances, the number of units which the site might acceptably provide may well be lower”*.

#### Site includes communally owned land

4. Representations from the occupiers of Nos. 5, 9 and 15 Cameron Crescent indicate that part of the proposed site, enclosed by a fence, is jointly owned by residents of Cameron Crescent (odd numbered houses). This area of tree covered land is within the conservation area and is shown as outwith the developable area in the prospective developer's submissions. If this land is privately owned as contended by the residents it could not be included within a development without their permission.

5. In response to my request for further information McNally Associates have confirmed that the land for which their client has an option excludes an area at the western edge of the site at the rear of properties along Cameron Crescent. In addition, this was never considered to be a developable area. The response explains further that the interface between the proposed housing site and the land at the western edge will be an internal landscaping issue, should development proceed. On this basis I consider that the area of land submitted to be in communal ownership should be excluded from Proposal H114.

#### City Development Plan sustainable development strategy

6. Representations refer to a conflict with Policy CDP2: Sustainable Spatial Strategy of the Proposed Plan. Attention is also drawn to the green belt objective on page 23 of directing new development and regeneration towards brownfield land. Policy CDP2 seeks to ensure that brownfield land is utilised in preference to greenfield sites. However, it is clear from the written context in the Proposed Plan for Policy CDP10: Meeting Housing Needs, that there are insufficient effective brownfield sites and that greenfield locations are required to meet the shortfall in housing land supply. This includes those sites identified as opportunities in the greenbelt review, including Carmunnock. Moreover, we have verified the scale of the shortfall in Issue 17 above. The site could be developed with no significant harm to the surrounding historic or natural environment.

#### Council policies and strategies

7. Reference is made to conflict with Policy CDP6: Green Belt and Green Network of the Proposed Plan, which states that the council will not support development that would adversely affect the function and integrity of the green belt. However, the site arose from the council's green belt review and has been identified as having potential to help offset the shortfall in the housing land supply for the Proposed Plan period.

8. The site was limited in extent by the council as a result of comments from Scottish Natural Heritage. Although it is near Coulters Wood, Cathkin Braes and the Big Wood there would be sufficient separation distance between the site and those environmental assets to avoid any unduly detrimental impacts. Scottish Natural Heritage also

considered that a significant loss of green belt functions of the land surrounding Carmunnock seemed unlikely. Development of the site would not result in coalescence with any other settlements.

#### City Plan 2/housing land supply

9. Representations question why matters have changed since City Plan 2 advised that there was sufficient housing land to 2025 and that release of the site was not justified because of environmental, heritage and public transport considerations. City Plan 2 was adopted in December 2009. Since that date the housing land requirement for Glasgow has been reviewed through a Housing Need and Demand Assessment (2011) as part of the preparation of the Glasgow and Clyde Valley Strategic Development Plan. This strategic development plan was approved in May 2012 and set a target of 91,400 houses to be delivered in Glasgow in 2008/9 – 2025. At Issue 17 above we have concluded that there is a significant shortfall in the supply of land for housing in the City during the Proposed Plan period.

#### Natural environment/biodiversity

10. The site has no specific nature conservation designation. Nevertheless, representations refer to the presence of various bird, animal and amphibian species that local residents have observed and value. I note that Scottish Natural Heritage has not commented on any matters relating to wildlife or nature conservation. The council has advised that the reported presence of any protected species would be a matter for investigation at the planning application stage. I consider that the recommendation in the Greenbelt review for a strong green belt edge in the form of woodland planting would provide an opportunity to create new wildlife habitat in mitigation for any losses.

#### Privacy, views, house values

11. If a planning application was submitted I would expect the council to consult neighbours in accordance with its normal development management procedures. Matters including the effect on the outlook from existing properties, potential overlooking/loss of privacy of the rear of houses at Cameron Crescent and mitigation of any noise and disturbance during construction would have to be taken into consideration by the council having regard to the proposed layout, housing design and separation distances from existing dwellings. The effect of a development on property values is not a material consideration that can be given any weight.

#### Conservation area/loss of village atmosphere

12. The site is located next to the Carmunnock Conservation Area. Representations suggest that the Picketlaw development is not in keeping with the character of the village.

13. Paragraph 143 of Scottish Planning Policy indicates that proposals for development within conservation areas and proposals outwith which will impact upon its appearance, character or setting, should preserve or enhance the character and appearance of the conservation area. Proposals that do not harm the character or appearance of the conservation area should be treated as preserving its character or appearance. Clearly the council will have to consider the impact of any development proposal on the setting of the conservation area. I consider that there is no reason why a development could not be designed to preserve or enhance that setting and to complement the rural location at the



edge of the village.

14. In my opinion a carefully designed small housing development on this site would have little impact on the village atmosphere or sense of community.

#### Quiet area

15. The council has confirmed that Carmunnock is not designated as a “quiet area”.

#### Infrastructure/traffic/noise and disturbance

16. The adequacy of the water supply to serve the site and its drainage would be assessed if a planning application is submitted. The council has advised that there is unlikely to be a capacity issue at the local schools.

17. Several matters are raised in relation to the traffic that would be generated by a housing development. These include increased traffic passing through the narrow village roads, Cathkin Road and Gallowhill Road with associated highway safety concerns and noise, the adequacy of access from the winding Cathkin Road and problems of speeding vehicles at that entrance to the village.

18. A Transportation Statement was submitted by the prospective developer of the site at the Main Issues stage of the Proposed Plan. Having regard to the assessment within the Transportation Statement, I consider that the traffic and access issues that are raised are not insurmountable and may be assessed at the planning application stage along with the need for any mitigation through improvements to the road network.

#### Current use/sustainability

19. The site is currently used as grazing land. However, the area of land to be lost from food production would be relatively small. I consider that the disbenefit arising from the loss of this agricultural land would be outweighed by the social benefits from meeting the need for additional housing in the Glasgow area.

#### Consultation

20. The council has confirmed that consultation was carried out at the Main Issues Report and further Potential Additional Sites stages. We have determined that the consultation process for the Proposed Plan was appropriate and acceptable.

#### Justification for development

21. The motivation for profit is not a material planning consideration that can be given any weight. The housing mix of the development, including housing for the elderly and affordable housing is a matter that may be determined at the planning application stage.

#### Alternative land for housing

22. A suggestion in representations is that two additional sites in Castlemilk which have been incorporated into the green belt could be developed. However, having considered the council's greenbelt review I agree that the two sites at zones 3A and 3B at Castlemilk should be designated as green belt rather than being potential development areas. The

sites at Castlemilk are therefore not appropriate as alternatives to site H114.

### Design solution

23. It is suggested that a design competition would be the route to achieve the best design solution. I agree that good design is essential, given the location of the site at one of the countryside approaches to the village. However, it is normal practice for such small sites for the developer to commission the proposed design and for the council, following public consultation, to assess if the submitted design in a planning application is acceptable.

### Extent of site to south-east

24. The representation from the prospective developer seeks the inclusion of additional land in the green belt and area of special landscape importance for housing. However, I accept the views of Scottish Natural Heritage and the council that the rising land to the south-east of the proposed site should be excluded because its development would have an unacceptable impact on the landscape setting of the village. It would also bring development closer to the edge of Coulter's Wood and reduce the sense of openness for users of the public footpath at the western edge of the wood. Various claimed benefits have been put forward to support the larger site, including access, sustainable urban drainage, a visitor car park and landscape framework. However, I consider that these claimed benefits from extending Proposal H114 to the south-east would be outweighed by the harm to the landscape setting of Carmunnock. The boundary of the site should not be modified.

### Extent of site to north-east

25. Extending the site to the north-east would allow the creation of a visitor car park for access to Coulter's Wood. At the site inspection I observed that visitors used an area of land near the start of the footpath at Cathkin Road for informal parking. The proposed access arrangements submitted by Dougall Baillie Associates would involve additional land to achieve a priority controlled junction or small roundabout. They submit that omission of this land would significantly constrain the ability of the development to realise the benefits for general road users and the access junction layout would be unnecessarily constrained, potentially requiring relaxations in road design standards.

26. Although formalised parking arrangements and an extension of the site to provide better access arrangements may be appropriate I am concerned that local residents may not have realised that extending the site to the north-east was under consideration. The access arrangements are also only in draft form at this stage. It would be inappropriate to accommodate this proposal and remove additional land from the green belt without proper consultation. I therefore consider that the boundary of the site should not be modified. Proposed access and parking arrangements could be included in any future planning application and subjected to normal consultation procedures.

### Background paper 13 – green belt review

27. The representation contends that a generous supply of housing land can be achieved in Glasgow without using the green belt. However, in the light of the predicted shortfall in housing land in the Proposed Plan period I consider that the council has carried out an appropriate review of the green belt. This is in accordance with SPP

paragraph 50 which indicates that in developing the spatial strategy, planning authorities should identify the most sustainable locations for longer-term development and, where necessary, review the boundaries of any green belt.

28. I consider that an upturn in the economy would not necessarily result in an upward revision of the effective housing land supply as suggested. Although the council is said to be failing to release brownfield sites, no examples are submitted to support the assertion.

29. The change in the housing land situation since City Plan 2 is dealt with above. Paragraph 40 of Scottish Planning Policy advises that decisions should be guided by certain policy principles, including considering the re-use or redevelopment of brownfield land before new development takes place on greenfield sites. However, it is clear that brownfield sites alone cannot meet the shortfall in housing land in the Proposed Plan period.

**Reporter's recommendations:**

Modify the Proposed Plan by excluding the area of land outwith the SMH land option from the western edge of site H114, as indicated on drawing 2408 SK 500A dated March 2016 submitted by McInally Associates. The Policy and Proposals Map South should be modified accordingly.

Issue 45	Housing Proposal H117 North and East of Garthamlock	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
The McColl Family (00412)		
Provision of the development plan to which the issue relates:	Three Community Growth Areas were identified in City Plan 2 at: - Robroyston - Baillieston/Broomhouse/Carmyle - Gartloch/Easterhouse At Gartloch/Easterhouse, three masterplan locations have since been identified. The focus in all three Community Growth Areas will be on securing the necessary infrastructure to allow these areas to progress	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00412 The McColl Family - Object to the extent of the area shown as proposal H117 on the Policy and Proposals Map, on the basis that a much larger release of land is required to deliver the community benefits identified in the area, including the Easterhouse Regeneration Route (EER, Proposal T005) the proposed Local Nature Reserve and the Seven Lochs Wetland Park.  The land that is the subject of this representation includes a site previously submitted for planning permission. Permission was granted by the Council for 300 houses, subject to a Section 75 relating to the construction of a section of the EER, and the creation of a Local Nature Reserve. It is considered that release of a larger area is justified, on the basis that the site for 300 houses is effective, and can be delivered in the short term, but also on the basis that the developer contributions required to deliver the community benefits referred to would require a much larger development of housing. The larger area identified is capable of being developed within the environmental constraints previously identified in City Plan 2, and by various studies. The larger area also meets the tests of effectiveness required by Scottish Planning Policy.		
Modifications sought by those submitting representations:		
00412 The McColl Family - Include the area shown in blue on Plan 2 on the Policy and Proposals Map, as an extension of Proposal H117, or as a separate Proposed Community Growth Area Masterplan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00412 The McColl Family - This area was considered by the City-wide Green Belt Review		

(OC46). The relevant sections can be found at paragraphs S5.1 to S5.12 and Map 9.

Gartloch/Easterhouse was identified as a Community Growth Area in City Plan 2. In view of the complexity of issues affecting the area, it was considered that further study was required in order to identify the extent of potential development land. The 2010 study by URS Consultants identified four zones as having development potential, and these are indicated as 5.1 to 5.4 on page 31 of the green belt review (OC23). These areas formed the starting point for the green belt review.

The green belt review concluded that the potential for development in Zone 5.1 was severely constrained by the extent of the Site of Importance for Nature Conservation designation in this area, and that masterplanning of the area would be appropriate to determine the extent of the development opportunity. This area has been identified as Proposal H117 in the CDP 10.

The area which is the subject of this representation includes a south-eastern section of H117 and extends to the east. It includes the site which has planning permission for 300 houses subject to a Section 75 agreement, encompasses all of Zone 5.2, and also includes an area to the north to the boundary with North Lanarkshire, and east to wrap around the former Gartloch Hospital site to the City boundary. In the light of the significant presence of environmental designations in this area, including City-wide SINCs, Sites of Special Landscape Importance and Ancient, Long-Established or Semi-Natural Woodland, the 2010 study concluded that, beyond the site with planning permission, there was little further development potential in this area. It was recommended that the remainder of Zone 5.2 be excluded from any further consideration. The green belt review considered that the consented site should be removed from the green belt if developed, and did not identify any of the remainder of Zone 5.2 as having potential for development.

Development towards the north would also potentially cause coalescence with North Lanarkshire where the development at Gartcosh crosses the City boundary.

The representation suggests that a much larger release of land is required to deliver the community benefits identified in the area. The identification of a search area for Community Growth in Gartloch/Easterhouse was intended to address a housing land requirement set out in the 2006 Structure Plan. The purpose of the 2010 URS study was to determine, taking account of the environmental and other constraints present in the area, the extent of land that could be developed for housing. The study conclusions have informed the green belt review, which has subsequently identified Proposals H115 to H117. Any infrastructure requirements or community benefits that follow from development would be related to the scale of housing proposed. Because of the sensitivity of the environment in this part of the City, it was not the intention of the search process to release sufficient land to deliver a greater amount of community benefits. The 2010 study, and the subsequent green belt review, have both concluded that development of the area which is the subject of this representation would cause the loss of significant environmental assets which are protected.

No modifications recommended.

#### **Reporter's conclusions:**

1. The representation seeks the addition of a substantial area of land in single

ownership for housing development either as an extension of proposed masterplan area H117 or as a separate community growth area. It advises that new housing would seem to be the best use for the site, probably combined with other retail and business uses, new community and recreational facilities, as envisaged as part of delivering a mixed use community growth area. The proposed site is generally rural in character with fields, woodland, hedgerows and lochans either side of Gartloch Road. It is within the recently designated Seven Lochs Wetland Park.

2. The proposed site extends from Garthamlock towards the Fort retail park and links to the motorway network. It is, in part, adjacent to the Gartloch Hospital redevelopment site and associated housing. The site was within the Easterhouse/Gartloch Community Growth Area in City Plan 2. The council advises that the 2010 URS Consultants' study for the Growth Area (Gartosh/Gartloch Site Selection and Guidance Final Report) identified 4 zones as having development potential. These formed the starting point for the subsequent assessment in the green belt review.

3. The proposed extended site includes part of zone 5.1 and zone 5.2 as defined in the Greenbelt Review. Part of zone 5.1 at Garthamlock has been included in the Proposed Plan as "H117 Proposed Community Growth Area Masterplan". The Greenbelt study concluded that the potential for development in zone 5.1 was severely constrained by a site of nature conservation importance and master planning would be appropriate to determine the extent of the development opportunity.

4. Zones 5.1 and 5.2 include a site for around 300 residential units that was approved by the council in 2009, subject to the signing of a section 75 agreement to cover the provision of a local nature reserve and recreational greenspace (ref: 06/04078/DC). The representation adds that development of the site would provide over 1km of the Easterhouse Regeneration Route and sustainable urban drainage.

5. The 2010 URS Consultants' study recognised that flooding issues and the presence of nature conservation sites meant that the potential site footprint was limited to a corridor in the western part of zone 5.2. It recommended that zone 5.2 be excluded from further analysis in the 2010 study, as there was very limited additional development potential within the zone beyond the boundaries of the consented site. The green belt study advised that there are no good reasons for departing from the study's conclusion regarding the scope for development beyond the consented site.

6. The representation suggests deletion of part of the proposed extension to the local nature reserve south of Gartloch Road and re-designation as part of the extended community growth area. It is submitted in the representation that this area contributes little in terms of conservation interest to the local nature reserve and was excluded from the floodplain in the Gartloch and Gartcosh Hydrological Study (2011). However, I consider that any amendment to the local nature reserve boundary would have to be based upon an ecological assessment rather than the submitted information in the representation.

7. The landowners consider that their land is effective as a site for housing and question whether the Easterhouse Regeneration Route and other community benefits anticipated from the Community Growth Area can be delivered, based upon the current level of development that is allocated. The representation provides an assessment of effectiveness based on the criteria in PAN2/2010, indicating that development could proceed despite the constraints set by the sites of nature conservation interest, flood risk

and past mining activity. The representation questions the validity of parts of the area designated as being flood plain because of the height of the land. The site is thought by the owners to be free of infrastructure constraints, but further assessment is needed. In my opinion there are a number of constraints, some of which will be overlapping, that need more detailed analysis before a sound conclusion may be drawn on the effectiveness of the land.

8. It is submitted that development of this larger site could provide funding for community benefits, including the Easterhouse Relief Road, given that the representation contends that there has only been limited collection of funds from recent developments. The council advises that it was not the intention of the search process to deliver a larger amount of community benefits.

9. The representation advises that City Plan 2 identifies the community growth area as having a capacity of 1,300 houses, based upon the Joint Structure Plan. No capacity is set in the Glasgow and Clyde Valley Strategic Development Plan, but the representation submits that it was always accepted that the area could accept a greater level of development, subject to detailed consideration of environmental constraints. At Issue 17 above we have concluded that there would be a shortfall in the housing land supply during the Proposed Plan period.

10. Nevertheless, despite this shortfall it would be inappropriate to modify the Proposed Plan to include this additional land for housing development. The proposal, for what would be a major development in the green belt, has not been subject to full public consultation, a Strategic Environmental Assessment. There is already a significant area of land identified for a master planning process at site H117 and the unimplemented permission subject to the section 75 agreement could provide 300 additional housing units. Moreover, the land subject to representation has been subject to assessment through the Greenbelt Review and associated studies. Having regard to these studies and all the submitted evidence I conclude that the land should not be allocated for development at this stage.

**Reporter's recommendations:**

No modifications.

Issue 46	Housing Proposal H118 Maryhill TRA	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55),Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Sylvia Thomas (00817)		
Provision of the development plan to which the issue relates:	Maryhill TRA is one of eight Transformational Regeneration Areas in the City where fundamental change is proposed. Surplus multi storey social rented housing stock has been demolished and is in the process of being replaced by new mixed tenure housing.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00817 Sylvia Thomas - I would like to stress that we should not have to tolerate these noise levels for the next few years while building continues for the next phase. My house is constantly filthy - and yes I do work, but I work in the event world and mostly at night, late finishes (anything from 11-3am), so I'm at home all day. My neighbour works night shift.  I would like to see (and hear) a reduction in this noise, muck, vibrations and a bit more respect for our property and lives or I will be seeking compensation for the constant disturbance. I emailed the Planning Dept before - 2 years ago - and still haven't received a reply.		
Modifications sought by those submitting representations:		
00817 Sylvia Thomas - None.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00817 Sylvia Thomas - The points raised are not planning related matters and are dealt with by other Council services or external agencies and organisations.  No modifications recommended.		
Reporter's conclusions:		
1. The representation acknowledges that some housing is needed in the Maryhill Transformational Regeneration Area and that there will be some disturbance to neighbouring areas. However, the main concern is over building works that have been underway for "phase 2" around Stirrat Street for over three years. This relates to the working hours and the levels of noise from works, trucks, diggers, vibrations and music, plus dust, dirt and flooding from heavy rain. I note that this matter has been taken up with		



the council's noise team.

2. The council considers that the points raised are not planning matters. Nevertheless, it is possible to impose conditions on a planning permission, if it is reasonable and necessary, to control hours of construction, require wheel washing for construction vehicles using the roads and to require a construction management plan. This can help to reduce the environmental impact of housing construction near to existing dwellings.

3. The specific problems referred to at Stirrat Street, would be a matter for the council to investigate and to determine whether any of the complaints concerned matters that breached planning conditions or that would constitute a statutory nuisance under the terms of the Environmental Protection Act 1990. The council has powers to issue a notice requiring the abatement of a statutory nuisance.

4. I acknowledge the problems that have been experienced by local residents. However, the issues raised in relation to current construction works near Stirrat Street are not matters which can be resolved through the proposed local development plan.

**Reporter's recommendations:**

No modifications.

Issue 47	Housing Proposal H125 East Govan/Ibrox TRA	
Development plan reference:	Policy CDP10 Meeting Housing Needs (Pages 53-55) Policy and Proposals Map	Reporter: Martin Seddon
Body or person(s) submitting a representation raising the issue (including reference number):		
Angus Macmillan (00813)		
Provision of the development plan to which the issue relates:	East Govan/Ibrox TRA is one of eight Transformational Regeneration Areas in the City where fundamental change is proposed. Surplus multi storey social rented housing stock has been demolished and is in the process of being replaced by new mixed tenure housing.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00813 Angus Macmillan - An area at the western end of Clydebrae Street, which falls within a Transformational Regeneration Area (H125), should be redesignated as 'mixed use' on the grounds that it includes a landscaped area, a children's football facility, the newly refurbished Riverside Community Hall, an area of ground to the west of the hall which the community hall management wish to use for expansion purposes and part of an industrial property (where support is being sought to use as a filmset buildspace/film studio for the film and television industry).		
Modifications sought by those submitting representations:		
00813 Angus Macmillan - Redesignation of part of Transformational Regeneration Area (H125) at the western end of Clydebrae Street for mixed use.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00813 Angus Macmillan - Proposal H125 has been identified as a proposal in the City Development Plan due to it being 1 of 8 Transformational Regeneration areas. This site is considered to have potential for new housing due to its size, neighbouring uses and location, in that it is considered to be easily accessible, next to existing services and infrastructure. This site contributes to meeting the City's housing needs, as required by Scottish Planning Policy.  A masterplan for the area has not yet been prepared. Any existing properties or facilities will have to be taken account of in the preparation of any proposal, as will protected open space. The Plan does not use a 'mixed use' designation, but requires that any development comply with Policy CDP 1: The Placemaking Principle and other relevant Policies and Supplementary Guidance. The local community and other interested parties would be expected to be involved in any consultation on the masterplan.  No modifications recommended.		

<b>Reporter's conclusions:</b>
<p>1. The representation seeks the re-designation of part of the Transformational Regeneration Area (TRA) at the western end of Clydebrae Street for mixed use. In particular support is sought for the use of part of an industrial property that is included in the TRA, for film set build space/film studio for the film and television industry. The area requested for re-designation also includes open space, a children's football facility, and the Riverside community hall. It is located in the northern part of the TRA, near to the River Clyde.</p> <p>2. The Proposed Plan defines TRAs as large scale housing-led regeneration projects. It adds that the programme aims to provide new sustainable mixed tenure communities through the provision of new housing, community facilities, green space and where appropriate commercial units.</p> <p>3. The designated regeneration area is large and contains a number of different uses. There is no specific 'mixed use' designation in the Proposed Plan. The council has indicated that it intends to prepare a masterplan for the area and that the local community and other interested parties would be expected to be involved in any consultation on the masterplan. It has confirmed that existing uses and proposals would have to be taken into account. Clearly, commercial uses which assist economic development, such as that referred to in the representation, may be appropriate and would be a matter for assessment as part of the masterplan process. Consultation on the masterplan would allow further representations to be made, and I consider that no modification to the Proposed Plan is necessary.</p>
<b>Reporter's recommendations:</b>
No modifications.

Issue 48	Sustainable Transport	
Development plan reference:	Strategic Approach (Pages 16-25) Policy CDP 11 Sustainable Transport (Pages 56-58) Policy and Proposals Map	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
Andrew Fraser (00392) Ron McLean (00415) Sportscotland (00429) Glasgow Centre for Population Health (00442) Candleriggs Limited (00463) Clydeport (00475) Wheatley Group (00501) Roderick McDougall (00507)		St Enoch Trustee Company Ltd (00597) Pollokshields Community Council (00609) Scottish Government (00621) John Lewis (00630) Strathclyde Partnership for Transport (00633) Dowanhill Hyndland and Kelvinside Community Council (00637) Brenda Lillicrap (00665) Transform Scotland (00669)
Provision of the development plan to which the issue relates:	Policy CDP 11 - Sustainable Transport particularly its provisions in relation to: transport in the City Centre; City Centre parking; walking and cycling; non-rail based public transport; and residential parking provision.	
Planning authority's summary of the representation(s):		
<u>Policy Wording/Diagrams</u>		
<u>Objecting</u>		
00669/1/004 Transform Scotland - Have significant concerns that car-free developments are to be on 'suitable sites' rather than the encouraged norm at least within the inner city area.		
00669/1/005 Transform Scotland - Have significant concerns that maps reveal little detail as to how the commitments on page 22 are to be achieved.		
00633/7/002 Strathclyde Partnership for Transport - Suggests amendment to the Strategic Outcome of 'A Connected Place' (page 22) - there should be an additional bullet which refers to making the most effective use of road space to enable efficient public transport and active travel movements on key corridors.		
00597/2/002 St Enoch Trustee Company Ltd - We support the Proposed Plan's strategy to manage transport demand. However, we would raise concerns where proposals seek to safeguard land for proposed transport infrastructure, which will have a detrimental impact on Town Centre investment by restricting new Town Centre development proposals or extensions to existing developments on these sites.		
00501/8/001 Wheatley Group - A compact city form will only be delivered if it is reflected in practice through the Planning and Roads consent systems. The parking and open space requirements currently imposed on new residential developments are inconsistent		

with this overall objective.

### Supporting

00609/3/001 Pollokshields Community Council - In general, support the draft policy Policy CDP 11: Sustainable Transport.

00633/7/001 Strathclyde Partnership for Transport - Supports the Strategic Outcome of 'A Connected Place' (page 22), including: the priority given to active travel and public transport; encouraging development in accessible locations; the creation of pedestrian and cycle friendly roads and streets; the objective to promote town centres as the focus for public transport and active travel networks; and the objective to reduce the impact of the strategic road network on local movement networks.

### City Centre Transport

#### Objecting

00415/1/007 Ron McLean - Wishes to see the rail proposal for the redevelopment of Glasgow Queen Street Station. This would develop an improved, more direct/integrated link into the adjoining Buchanan Street Subway, and better convenient/user friendly link with Buchanan Bus Station.

00507/1/005 Roderick McDougall - Wishes to see the policy safeguard land required for extending M8 junction 15 sub-surface road link to Duke Street. The traffic congestion around the Cathedral precinct cannot be relieved while a major motorway junction exists at this location. The sub surface extension of the intersection to Duke Street will remove the bulk of traffic from this historic area and from Castle Street and improve air quality. Most major infrastructure projects have a much longer gestation period than the 5-year coverage of the development plan. Many major projects have only been possible because of the foresight of previous planners in reserving land to fulfil their aspirations. Whilst understanding the effects of blight, this may be reduced to the minimum by taking future aspirations to the detailed design stage now thus identifying the exact land requirements and releasing the surrounding land for development in the knowledge of the proposal and its exact effects on the area.

00621/7/001 Scottish Government - The Plan and Action Programme should mention the City Centre Transport Strategy, part of the City Centre Strategy. It is recommended that it is included within Policy CDP 11 'Sustainable Transport'. The City Centre Transport Strategy is the most up to date document in terms of transport for the City and is important for the development of the transport network within Glasgow, affecting walking, cycling, public transport, traffic and parking and outline potential schemes including the provision of a new bus hub and potential re-routing of traffic from the M8 at Townhead. The Plan's spatial strategy should therefore take cognisance of The Strategy and its contents and not be prepared in isolation.

00633/18/005 Strathclyde Partnership for Transport – Policy CDP 11, Context - The City Centre Transport Strategy, recently consulted upon, should be reflected here. Whilst we acknowledge that the SDF and LDFs for the City centre and the city centre districts, respectively, will reflect the spatial elements of the City Centre Transport Strategy, we suggest the Plan identify it as a key influence over sustainable transport for the city centre

00630/2/002 John Lewis - Recognise that, whilst the restriction on car parking in the City Centre is, in part, designed to encourage the use of other modes of transport, a significant restriction in car parking could deter future shoppers from visiting the City Centre, particularly in the face of out of town developments with free car parking.

00597/2/003 St Enoch Trustee Company Ltd - We support the opportunity to encourage access to the City Centre via other modes of transport but we would be concerned about too restrictive policies on new development unless these are also applied in out of town locations. Restricted parking in the City Centre may deter future shoppers from visiting the city and in turn would impact on the vitality and viability.

00463/2/001 Candleriggs Limited - GCC should consider positive traffic management improvements to enable the extension of the High Street from Argyle Street along Trongate. One solution could be to extend the pedestrian route to Trongate from Argyle Street, or potentially, decrease the width of Trongate by extending pedestrian permeability and allowing public transport only. This would create a more attractive and visibly welcoming environment for the public and break down existing barriers that inhibit additional footfall at this part of the Trongate.

#### Supporting

00597/2/001 St Enoch Trustee Company Ltd - We support measures which will improve the City's transport networks and make movement around the City and to the City Centre easier for shoppers. In light of this, we made separate representations on behalf of our client, to the Glasgow City Centre Transport Strategy in May 2014.

#### Walking and Cycling

#### Objecting

00429/9/001 Sportscotland - Wishes to see a greater focus on the delivery of sustainable transport, specifically in relation to cycling. The Plan should be more aspirational in terms of its spatial context and policy wording and should reflect the delivery of projects such as the City's Strategy Plan for cycling. The policy as worded is more safeguarding in tone as opposed to seeking to deliver these areas.

00609/3/004 Pollokshields Community Council - Two key sites H073 - 60 Maxwell Road and H081 - 55 Maxwell Road sit just to the south of the proposed station, could act as a stepping stone between West Street and East Pollokshields. There is a strong desire line here that could form a new pedestrian and cycle link into the City Centre from the Southside utilising the Tradeston Bridge to take people straight into the Broomielaw/IFSD. This would help promote a compact city form that is sustainable and well-connected and would combat the severance of the Southside.

00637/21/004 Dowanhill Hyndland and Kelvinside Community Council - Support increasing active travel - but mixing cycling and pedestrians without proper safeguards can be very dangerous for older people.

00665/1/001 Brenda Lillicrap - Seeks a change to policy CDP11 - after the initial bullet-pointed list of safeguards, insert: 'The Council will develop an accessible, convenient and efficient network of cycle infrastructure attractive to all types of cycle user and potential cycle user. The infrastructure will be built in accordance with the principles and

specifications of internationally recognised best practice, as set out in, for example, the Crow Manual. This will ensure that Glasgow makes its appropriate contribution to the target for Scotland that 'by 2020, 10% of all journeys ... will be by bike', and supports other key objectives of the Plan. A network of cycle safe, convenient and attractive infrastructure is needed to encourage significant numbers of people to see cycling as a real transport choice, but the LDP currently makes no commitment to providing infrastructure of any standard, other than the few routes indicated on the Policy and Proposals Map.

00669/1/002 Transform Scotland - Have significant concerns that the detailed transport proposals are all for roads, with the exception of Fastlink and Robroyston station. Question why cycling and walking links, and wider public transport improvements are not included in these detailed plans.

00669/1/003 Transform Scotland - Have significant concerns that the road networks are 'planned' while pedestrian and cycle links are 'aspirational'.

00442/5/003 Glasgow Centre for Population Health - The majority of transport improvements identified in Policy CDP 11 relate to motorised forms of travel. Would welcome a commitment to delivering an improved active travel network through the identification of key sites for development throughout the City.

#### Supporting

00442/5/002 Glasgow Centre for Population Health - Welcome that new developments will be required to promote and facilitate walking and we hope that this will be supported by strong supplementary guidance.

#### Other Public Transport

#### Objecting

00392/1/002 Andrew Fraser - Would like to see improved public transport links on Dumbarton Road with access to a larger car park on Plean Street.

00475/1/001 Clydeport - Seeks amendments to Policy CDP11, associated contextual text and to Fig. 19, to properly reflect the important role of the River Clyde and its port terminals in the sustainable movement and handling of freight be it import or export cargo. Whilst Policy CDP11 makes reference to safeguarding existing transport infrastructure (including the River Clyde) from inappropriate development, there is no reference within the Policy to the role of the River Clyde and its port terminals in the sustainable movement and handling of freight be it import or export cargo. There is a need for the policy to explicitly identify and safeguard King George V Dock to help safeguard the role it can play in delivering modal shift.

00637/21/001 Dowanhill Hyndland and Kelvinside Community Council - Wishes to see the re-regulation of bus services. Re-regulating buses and improving out of city parking etc. would benefit the West End enormously because it is currently over-run with cars (both traffic and parking) at present. We see this is the best way to improve public transport.

00637/21/005 Dowanhill Hyndland and Kelvinside Community Council - Wishes to see an

increase in out-of-city parking facilities, park & ride etc. Re-regulating buses and improving out of city parking etc. would benefit the West End enormously because it is currently over-run with cars (both traffic and parking) at present. We see this is the best way to improve public transport.

00669/1/007 Transform Scotland - Would like to see the plan contain a clear strategy for improving active travel and public transport links across the city, both in terms of strategic routes and small scale, local improvements, many of which could be achieved at low cost and with little disruption. Given Glasgow City Council's historic - and even recent - enthusiasm for new roads, we worry that the lack of such a strategy is telling of the city council's priorities.

00633/18/010 Strathclyde Partnership for Transport - Policy - SPT welcome the direction of major development to locations well served by existing public transport services and active travel routes, however we would seek clarity on how this is to be defined. Acceptable levels of accessibility should be defined.

### Supporting

00637/21/002 Dowanhill Hyndland and Kelvinside Community Council - Support Subway modernisation.

00669/1/001 Transform Scotland - Generally welcomes the tone of the new proposed City Development Plan, and is pleased to see that a key aim of the plan is to maintain a compact urban form to support sustainable development. Also welcome commitments to: repair or replace walking and cycling connections that have been lost through vehicular dominated design; promote town centres as the focus for public transport networks; minimise the impact of strategic road infrastructure on local movement; and reduce non-essential car journeys by restricting parking and designing roads and streets that are pedestrian and cycle friendly.

00633/18/006 Strathclyde Partnership for Transport - Aims - SPT support and welcome the aims of the policy which seek to deliver a balanced approach to travel by all modes of transport.

### **Modifications sought by those submitting representations:**

#### Policy Wording/Diagrams

00669/1/004 Transform Scotland - Policy CDP11 should be reworded by changing bullet 4 of second set of bullet points to read 'support the development of car-free housing'.

00669/1/005 Transform Scotland - Policy CDP11 should be amended to set out how the commitments on page 22 ('Connected Place Strategic Outcome') are to be achieved.

00633/7/002 Strathclyde Partnership for Transport - Amend the 'Connected Place' Strategic Outcome to include an additional box to make reference to making the most effective use of road space to enable efficient public transport and active travel movements on key corridors.

00597/2/002 St Enoch Trustee Company Ltd - The Plan should not safeguard land for proposed transport infrastructure, which will have a detrimental impact on Town Centre



investment by restricting new Town Centre development proposals or extensions to existing developments on these sites.

00501/8/001 Wheatley Group - The Plan should put in place parking and open space requirements for new residential developments which help deliver a compact city form.

### City Centre Transport

00415/1/007 Ron McLean - The City Development Plan should include the rail proposal for the redevelopment of Glasgow Queen Street Station.

00507/1/005 Roderick McDougall - The City Development Plan should safeguard land for a sub-surface road link from M8 junction 15 to Duke Street.

00621/7/001 Scottish Government - Amend Policy CDP11, and the Action Programme, to make mention of the City Centre Transport Strategy.

00633/18/005 Strathclyde Partnership for Transport - Context of Policy CDP11 should be reworded to make reference to the City Centre Transport Strategy and identify it as a key influence over sustainable transport for the city centre.

00630/2/002 John Lewis - The plan should not impose a significant reduction in city centre car parking.

00597/2/003 St Enoch Trustee Company Ltd - The City Development Plan should take a less restrictive view on city centre parking.

00463/2/001 Candleriggs Limited - Amend the City Development Plan to promote positive traffic management improvements from Argyle Street along Trongate, including extending the pedestrian route to Trongate from Argyle Street, or decreasing the width of Trongate by extending pedestrian permeability and allowing public transport only.

### Walking and Cycling

00429/9/001 Sportscotland - Policy CDP11 should be reworded to provide a more aspirational context and policy wording, rather than the safeguarding tone currently employed.

00609/3/004 Pollokshields Community Council - Policy CDP11 should be amended to identify a new pedestrian and cycle link into the City Centre from the Southside utilising the Tradeston Bridge to take people straight into the Broomielaw/IFSD.

00637/21/004 Dowanhill Hyndland and Kelvinside Community Council - Policy CDP11 should be reworded to indicate that mixing cycling and pedestrians without proper safeguards can be very dangerous for older people.

00665/1/001 Brenda Lillicrap - Policy CDP11 should be reworded. After the initial bullet-pointed list of safeguards, insert: 'The Council will develop an accessible, convenient and efficient network of cycle infrastructure attractive to all types of cycle user and potential cycle user. The infrastructure will be built in accordance with the principles and specifications of internationally recognised best practice, as set out in, for example, the Crow Manual. This will ensure that Glasgow makes its appropriate contribution to the

target for Scotland that 'by 2020, 10% of all journeys ... will be by bike', and supports other key objectives of the LDP'.

00669/1/002 Transform Scotland - Policy CDP11 should include detailed plans for cycling and walking links, and wider public transport improvements.

00669/1/003 Transform Scotland - Policy CDP11 should be amended to make pedestrian and cycle links 'planned' as opposed to 'aspirational'.

00442/5/003 Glasgow Centre for Population Health - Policy CDP 11 should be reworded to provide a commitment to delivering an improved active travel network through the identification of key sites for development throughout the city.

#### Other Public Transport

00392/1/002 Andrew Fraser - The City Development Plan should promote improved public transport links on Dumbarton Road and a larger car park on Plean Street.

00475/1/001 Clydeport - Policy CDP11 should be reworded to reflect the important role of the River Clyde and its port terminals in the sustainable movement and handling of freight, be it import or export cargo, including explicitly identifying and safeguarding King George V Dock.

00637/21/001 Dowanhill Hyndland and Kelvinside Community Council - The City Development Plan should support re-regulation of bus services.

00637/21/005 Dowanhill Hyndland and Kelvinside Community Council - Policy CDP11 should be reworded to promote an increase in out-of-city parking facilities, park & ride etc.

00669/1/007 Transform Scotland - The City Development Plan should contain a clear strategy for improving active travel and public transport links across the city.

00633/18/010 Strathclyde Partnership for Transport - Policy CDP11 should be reworded to provide clarity on how major development will be guided to locations well served by existing public transport services and active travel routes and to define acceptable levels of accessibility.

#### **Summary of responses (including reasons) by planning authority:**

##### Policy Wording/Diagrams

##### Objecting

00669/1/004 Transform Scotland - Policy CDP11 states that the Council will support the development of car-free housing on suitable sites. This reflects City Plan 2 (CE17) policy RES 7: Car Free Housing and is intended to reflect the fact that the Council can only control parking in the surrounding area when developments are located within existing restricted or controlled parking zones. The promotion of car-free housing in areas outwith controlled parking zones poses the risk that cars owned by occupants of car-free developments may spill out onto surrounding streets. Ideally car free developments should also be located within an area of high frequency public transport and have convenient and safe access to local shops and facilities.

Supplementary Guidance will be brought forward to support policy CDP11 and will set out, in further detail, the criteria which the council will take into account in assessing applications for car-free developments. These will be based largely on those set out in City Plan 2 policy RES 7.

No modifications recommended.

00669/1/005 Transform Scotland - Page 22 identifies 'A Connected Place' as being one of the strategic outcomes that the plan is intended to achieve. It is supported by a number of objectives, also set out on page 22. Some of these are 'mappable' – e.g. 'Infrastructure', with regard to the key elements of transport infrastructure necessary to deliver new housing etc. and to improve connectivity within the City. Figure 19 (which supports CDP 11) and the Policy and Proposals Map illustrate the key infrastructure elements, that the Plan can help deliver, that have, thus far, been identified to help meet this outcome. These include new roads, aspirational walking and cycling routes and new rail stations. Work is also underway to supplement this picture, including a refresh of Glasgow's Strategic Plan for Cycling (SPC) 2010-2020 (OC32a and OC32b) and work with Sustrans to identify a network of deliverable cycle routes throughout the City. These can be incorporated into future iterations of the LDP but, in the meantime, will be considered material considerations in the determination of planning applications.

However, many of the objectives identified on page 22 will be delivered through policy provisions which are not easily mappable. These include:

- directing major development to locations well served by existing public transport services and active travel routes, dealt with in policy CDP11;
- designing new development to deliver environments that are pedestrian and cycle friendly (policies CDP1 and CDP11);
- restricting parking (policy CDP11);
- promotion of town centres as the focus for investment, thereby supporting public transport (policy CDP4);
- increasing the population around town centres by supporting higher residential densities in sustainable locations (policy CDP2); and
- repairing walking and cycling connections lost through vehicular dominated design (policies CDP1, CDP2 and CDP11).

Supplementary Guidance will support these policy provisions by providing further guidance on how they are to be implemented.

These elements of policy cannot be mapped easily and are not, therefore, on the Policy and Proposals Map.

No modifications recommended.

00633/7/002 Strathclyde Partnership for Transport – Whilst this is an approach which is generally supported, the Plan exerts little control over use of public roads, meaning much of the potential for managing road space cannot be directly addressed by the Plan.

No modifications recommended.

00597/2/002 St Enoch Trustee Company Ltd - The Plan's strategy is intended to enhance the attractiveness of town centres as the focus for investment and new transport

infrastructure should help do this by enhancing accessibility to them. Whilst there may be circumstances when a transport proposal could impact on a town centre development proposal, it is considered that this would only happen where there would be an overriding public interest in delivering better accessibility.

It is not clear whether the objector considered this to be the case with any of the proposals in the Plan, but no detail has been provided in relation to any specific proposals of concern.

No modifications recommended.

00501/8/001 Wheatley Group - One of the Plan's two key aims is a 'compact city form that supports sustainable development'. This accords with the SDP's spatial development strategy of a compact city model. The SDP defines this as the promotion of 'higher urban densities and mixed land uses around an efficient public transport system, and a geography which seeks to reduce pollution, encourage active travel and low energy consumption' (CE6, Glossary, page 66). Policy CDP2 promotes higher residential densities in sustainable locations as a means of helping deliver this aim.

Residential Parking standards are currently set out in City Plan 2 Policy TRANS 4 (CE17). It sets a basic residential standard of 1 allocated space per dwelling for residents and an additional 0.25 unallocated spaces per dwelling for visitors. However, TRANS 4 indicates that variation, above or below these basic standards, can be made where local circumstances (including public transport accessibility; density and greenspace considerations; townscape and design requirements; and car availability in the surrounding area) justify it. Background Paper 11 (OC45, paragraph 5.57) indicates that the standards set out in TRANS 4 will be updated and set out in Supplementary Guidance, but is considered unlikely that there will be any significant change in this basic approach. In addition, Policy CDP11 supports car parking at basement level within new development. Whilst this might only be feasible within large new residential developments, it provides for further flexibility in delivering higher densities, as part of a placemaking approach, without requiring additional space for parking at street level.

SPP recognises the benefits of open space and indicates that planning should protect, enhance and promote green infrastructure, including open space and green networks, as an integral component of successful placemaking (CE2, paragraph 220). Open space is as important in a compact city form as it is in lower density urban form, and is necessary, as part of a multi-functional green network, to deliver climate resilience. The Open Space standards included in City Plan 2 (CE17, Policy ENV 2) are currently being reconsidered through the open space strategy, but it is likely that different quantity standards will be specified for the City Centre, Inner Urban Area and Outer Urban Area, reflecting their differing residential densities. This, and the flexibility incorporated into residential parking standards, means there is no inconsistency with ambitions for a compact city form.

No modifications recommended.

### Supporting

00609/3/001 Pollokshields Community Council, 00633/7/001 Strathclyde Partnership for Transport - Noted. No modifications recommended.

City Centre TransportObjecting

00415/1/007 Ron McLean - Network Rail is proposing to redevelop Queen Street station as part of the Edinburgh Glasgow Improvement Programme (EGIP), partly to help meet projected growth in passenger use. Network Rail is applying for a Transport and Works Scotland order to deliver the work.

Essentially, an intensification of the existing use is proposed. Whilst it is not considered that this would necessarily warrant identification on the Policy and Proposals Map, there could be scope to reflect the proposed redevelopment in the context to Policy CDP11. The Reporter could, if so minded, amend the first paragraph of the context to Policy CDP11 by adding the following text at the end of the paragraph: 'Network Rail has plans to redevelop Queen Street Station as part of the Edinburgh Glasgow Improvement Programme (EGIP), helping meet projected growth in passenger volumes.' This would represent a purely factual amendment which would bring clarity to the policy context.

00507/1/005 Roderick McDougall - This refers to a previous aspiration to deliver a road link between M8 junction 15 and Duke Street, utilising vacant land between High Street and Duke Street, to the east of Burrell's Lane.

The Council no longer has ambitions to deliver such a scheme, and it was not included as a proposal in City Plan 2 (*CE17*). Neither was it included in the Main Issues Report, and it has not, therefore, been subject to consultation with the public or with the Key Agencies. The objector has not provided any evidence to support its inclusion as a proposal in this Plan.

The land required for the link has now been developed for flats, and it is considered that, even if it had been desirable to identify a link as a proposal, it is no longer possible to do so.

No modifications recommended.

00621/7/001 Scottish Government, 00633/18/005 Strathclyde Partnership for Transport - The City Centre Transport Strategy (CCTS) (OC36) was published for public consultation on 11 April 2014, after the Proposed Plan had been approved by the Council's Executive Committee. Whilst there was prior liaison to ensure the two documents were broadly in alignment, the Proposed Plan does not set out all of the proposals identified in the CCTS, not least because many of these relate to the use of public roads, and cannot be directly addressed by a land use Plan. However, many of the proposals will be incorporated into the 9 City Centre District Local Development Frameworks, proposed to be brought forward as Supplementary Guidance to support both the CCTS and the Plan. In addition, the Plan already mentions the prospect of improvements to local road junctions at junction 15 (Townhead).

Nevertheless, it could help bring clarity to the Plan by making reference to the CCTS in policy CDP11, specifically that it constitutes a strong material consideration in the determination of planning applications.

The Reporter could, if so minded, amend policy CDP 11 by inserting new text after the first paragraph proper of the policy, to read: 'The Council has produced a City Centre

Transport Strategy that will inform Spatial Supplementary Guidance in the City Centre and that constitutes an important material consideration in determining planning applications in the City Centre and surrounding areas.’

00630/2/002 John Lewis, 00597/2/003 St Enoch Trustee Company Ltd - The Main Issues Report considered the issue of city centre parking (CE8, Issue 4.8). In relation to shopping, it is the supply of public parking spaces (on and off-street) that is important. Background Paper 11 (OC45, paragraph 5.53) sets out the options considered in the MIR, indicating that the preferred option was to retain the City Centre public parking provision policy approach set out in City Plan 2, which limits the amount of permanent off-street public parking to that shown on a map accompanying the policy. Policy CDP11 indicates that public off-street parking in the City Centre will be limited to the levels to be identified in the City Centre Strategic Development Framework (SDF) and Local Development Frameworks (LDFs) and that until these documents are adopted, City Centre public off-street parking will be limited to existing levels or replacement provision that does not exceed that being replaced.

Since the publication of the Proposed Plan, work has been taking place to produce a City Centre Parking Review to inform the production of the City Centre SDF and the 9 associated LDFs. This will clarify, amongst other things, what the total capacity of off-street parking in the City Centre should be. The Review is nearing completion and initial findings indicate that the existing permanent off-street parking supply in the City Centre is not operating at capacity and is sufficient to meet the needs of the City Centre, particularly in relation to shopping trips. As a result it is likely that the public, off-street parking ‘ceiling’ for the City Centre will reflect the existing provision – i.e. the Review/SDF is likely to say that no additional public, off-street parking provision should be provided and that no reduction in the existing permanent off-street supply is considered necessary.

The MIR also considered the issue of temporary car parking in the City Centre. Background Paper 11 (OC45, paragraph 5.54) refers and indicates that a number of temporary car parks have been permitted in recent years, with a view to them delivering environmental enhancements prior to development. The economic downturn has meant that these sites are not being taken up for development to the same degree as would previously have been the case, and this has resulted in a marked growth in temporary provision, but without the environmental enhancements which were anticipated. The initial findings of the City Centre Parking Review indicate that: there is no need for the retention of this temporary provision to meet the wider, non-commuting needs of the City Centre; and that there is capacity in the permanent supply. As such, the Plan states that the Council will no longer support proposals for temporary car parking in the City Centre, unless necessary as an interim measure when replacing permanent provision.

No modifications recommended.

00463/2/001 Candleriggs Limited - The Plan is a land use plan and exerts little control over use of public roads, meaning much of the potential for traffic management, including pedestrianisation, cannot be directly addressed by the Plan. However, the City Centre Transport Strategy (CCTS) (OC36) includes suggestions for pedestrian infrastructure improvements, targeted on key walking routes and incorporating enhanced public realm. It includes a map that illustrates the principal public realm improvements envisaged as part of the City Deal initiative, including Argyle Street/Trongate.

No modifications recommended.

Supporting

00597/2/001 St Enoch Trustee Company Ltd - Noted. No modifications recommended.

Walking and CyclingObjecting

00429/9/001 Sportscotland, 00665/1/001 Brenda Lillicrap, 00669/1/002, 00669/1/003 Transform Scotland, 00442/5/003 Glasgow Centre for Population Health - The Plan's two overarching policies, CDP 1 and 2 (the Placemaking Principle and Sustainable Spatial Strategy), promote an approach to development which promotes regeneration and a compact city form, focussed on development in sustainable locations, as a means of facilitating enhanced connectivity and active travel, rather than motorised journeys. This will require the provision of an enhanced infrastructure for active travel, which can take the form of traffic calmed streets and spaces and/or dedicated provision in the form of on and off-road routes, including to, and through, new development.

The Plan (and associated Supplementary Guidance) can ensure that new development is designed to promote cycling and walking, including: the provision of cycle parking at the journey start and end; safe and attractive routes through development sites; and linkages to existing and proposed routes. Policies CDP1 and CDP11 will help deliver this ambition, and CDP11 (in conjunction with the Policy and Proposals Map) identifies specific (though not exhaustive) examples (aspirational pedestrian and cycle links) of where new development will be expected to deliver identified links. However, the Plan is a land use plan and exerts little control over use of public roads, meaning much of the potential for managing road space to promote cycling, including provision of marked lanes, traffic calmed streets, dropped kerbs, etc., cannot be directly addressed by the Plan. Other Council strategies deal with on-road provision, including plans to implement a series of cycle routes through the city centre, mainly segregated from traffic, as set out in the City Centre Transport Strategy (OC36).

The Council recognises the importance of ensuring that the Council's roles, as both planning authority and as roads authority, are complementary when delivering a cycling and walking infrastructure which will help deliver growth in both modes. As a result, work has recently started to refresh Glasgow's Strategic Plan for Cycling (SPC) 2010-2020 (OC32a and OC 32b). The Council has also been working with Sustrans to identify a network of deliverable cycle routes throughout the City. This network will help deliver the refreshed SPC by setting out a city cycle network which incorporates on road and off-road elements and sections through development sites. Both the SPC and Network will be the subject of public engagement in due course.

Proposals for new roads generally reflect proposals which have been included in the development plan for many years. As a result, it was possible, at the time of drafting the Plan, to safeguard a route alignment for them. Whilst the North Clydeside Development Route and East End Regeneration Route are to be developed by the Council and its partners, others are to be delivered through new development, in much the same way as the aspirational pedestrian/cycling routes set out in the Plan. More 'positive' proposals for the delivery of additional walking and cycling routes are expected to emerge from the work being undertaken with Sustrans and on the SPC.

Whilst work on the SPC and City Cycle Network will not be completed in time to

incorporate key elements into the Plan, it would be beneficial to make reference to the work which is being undertaken to refresh the Strategic Plan for Cycling and to identify a network of deliverable cycle routes throughout the City.

The Reporter could, if so minded, amend the context to policy CDP11 by inserting new text, at the end of the penultimate paragraph, to read 'work has recently started to refresh Glasgow's Strategic Plan for Cycling (SPC) 2010-2020. The Council has also been working with Sustrans to identify a network of deliverable cycle routes throughout the City. This network will help deliver the refreshed SPC by setting out a city cycle network which incorporates on road and off-road elements and sections through development sites. Both the SPC and Network will be the subject of public engagement in due course and, when adopted, will be considered material considerations.' This would help clarify the role they would play in delivering the policy aim of encouraging opportunities for active travel.

00609/3/004 Pollokshields Community Council - Policy CDP11 indicates that the Council will support the delivery of the aspirational pedestrian and cycle links shown on Figure 19. These are some of the key links considered desirable for overcoming barriers to movement on foot or by bicycle, and it is anticipated that others will be identified, as part of a placemaking approach, in other locations. This reflects the policy requirement that the Council will require new developments to be designed to promote and facilitate walking and cycling, including direct connections to the walking and cycling networks.

This route could form a key component in helping deliver safe and direct access between Pollokshields, West Street Underground and the Tradeston Bridge. It is anticipated that a placemaking approach, in conjunction with policy CDP11, would help identify and deliver this link. However, to clarify how the policy intention could be delivered in this location, it could be beneficial to identify this route on the Policy and Proposals Map as a means of ensuring its delivery, should a development proposal in this location be submitted.

The Reporter could, if so minded, amend Figure 19 and the Policy and Proposals Map to identify an aspirational pedestrian/cycle link between Pollokshields, West Street Underground and the Tradeston Bridge. This would not have any implications for the LDP strategy or other policies within the Plan, but would clarify the sort of connection which policies CDP1 and CDP11 should deliver, should development proposals come forward for this location.

00637/21/004 Dowanhill Hyndland and Kelvinside Community Council - The policy states that the Council will require new developments to be designed to promote and facilitate walking and cycling. The precise detail of how this will be done will depend on the local circumstances and a placemaking approach to the new development.

Cycling can often be accommodated safely on the carriageway where traffic speeds have been slowed sufficiently or where cycle lanes have been provided. However, shared use provision can be desirable in many instances, especially on National Cycle Network Routes or Safer Routes to School, where children are likely to cycle. The design of shared use routes will require to ensure the resolution of conflicts with pedestrians and other users and this is generally addressed in line with the guidance set out in the Government's Cycling by Design (OC49) as well as the Council's Design Guide for New Residential Areas (OC34).

The Supplementary Guidance being brought forward to support this policy will indicate



that new walking and cycling routes should be designed to reflect guidance in Cycling by Design and a placemaking approach. It is considered that detailed reference to the design of new active travel routes is too detailed a matter for the LDP.

No modifications recommended.

#### Supporting

00442/5/002 Glasgow Centre for Population Health - Noted.

No modifications recommended.

#### Other Public Transport

#### Objecting

00392/1/002 Andrew Fraser - Dumbarton Road is already well-served by buses, including the high frequency nos 1 and 2. The Plan also promotes the Fastlink bus based public transport scheme and the North Clydeside Development Route (NCDR). The NCDR is a proposal to develop a new road from Glasgow Harbour to the City boundary, is intended to take strategic traffic off Dumbarton Road. Doing so would help provide for more reliable public transport journeys on this key corridor.

In the Council's responses to the objections to the NCDR and Fastlink (issues 50 and 51), it is recognised that Renfrewshire Council's proposals for a new road bridge across the Clyde at Yoker would likely result in a marked change in traffic movements in the north west of the City, and that a holistic examination of potential traffic and transport issues in this part of the City would be prudent. This could offer further scope to examine public transport options serving the area.

The objector has offered no justification for including a larger car park at Plean Street as a proposal in the Plan. There would not appear to be any pressing traffic management issues in the area which would justify including such a proposal in the Plan at this time.

No modifications recommended.

00475/1/001 Clydeport - City Plan 2 included a policy (CE17, TRANS 7: International Freight Transport Facilities) that safeguarded the site of the transport facilities at King George V Dock from development that would impair its effective operation as a freight facility. This policy conformed to the Glasgow and the Clyde Valley Joint Structure Plan 2006 (Strategic Policy 5: Competitive Economic Framework), which safeguarded a number of international freight transport facilities, including King George V Dock, because of their importance to the economic competitiveness of the Glasgow and Clyde Valley Metropolitan Area.

Strategy Support Measure 6 of the 2012 Strategic Development Plan (CE6) safeguarded the sites of a number of strategic freight transfer hubs, but King George V Dock wasn't included. As a result, the Proposed Plan does not make specific reference to it. However, Issue 1 of the SDP Main Issues Report of January 2015 (CE7) identifies the inclusion of King George V Dock as a strategic freight hub as its preferred option for the new SDP.

Policy CDP11 safeguards existing transport infrastructure, which would include freight hubs such as King George V Dock. However, it could be beneficial to specifically recognise the important role played by freight facilities in CDP11, providing further clarity to the policy.

The Reporter could, if so minded, amend: the first bullet point of Policy CDP 11 to read 'existing transport infrastructure (including the River Clyde, Forth and Clyde Canal and strategic freight hubs) from inappropriate development'; and the Plan's glossary to include a new entry, to read: 'Strategic Freight Hubs: freight facilities that have an important economic role in supporting modal shift and the transportation demands of the key sectors, such as King George V Dock.'

00637/21/001 Dowanhill Hyndland and Kelvinside Community Council - This would require a change to primary legislation and is not something that can be addressed by the Plan.

No modifications recommended.

00637/21/005 Dowanhill Hyndland and Kelvinside Community Council - Where opportunities arise, and other considerations can be met, the Council is supportive of park and ride facilities being provided on the edge of the City. The Plan's proposal for a rail station at Robroyston includes park and ride provision. However, the Plan cannot control, nor promote, proposals for park and ride outwith the City boundary. This would be a matter for SPT to address with surrounding authorities.

Re-regulation of the buses would require a change in primary legislation and is not something that can be addressed by the Plan.

No modifications recommended.

00669/1/007 Transform Scotland - The Plan's policies promote the development of a compact urban form, with development focussed on locations well served by public transport and active travel routes. This is intended to provide an urban form in which: enhanced patronage helps ensure public transport services are viable; and journey distances are relatively short, helping promote active travel.

However, the Plan is a land use plan and exerts no direct control over public transport planning or the use of public roads. Issue 4.1 of the Main Issues Report (CE8) proposed that the Council would work with SPT, Transport Scotland and others to identify and deliver a modern, high quality public transport system for the City. The Council cannot do this on a unilateral basis. Background Paper 11 indicates that Transport Scotland's Strategic Transport Projects Review Intervention 24, and SPT's proposed conurbation public transport study, would provide a basis for a public transport strategy. However, the implications for land use which arise from Intervention 24 are minimal and work on the Conurbation Public Transport Study has stalled (OC45, paragraph 5.14). As a result, the plan has focussed on the known transport interventions which the land use planning system can help deliver at this time.

Work has recently started to refresh Glasgow's Strategic Plan for Cycling (SPC) 2010-2020 (OC32a and OC 32b). The Council has also been working with Sustrans to identify a network of deliverable cycle routes throughout the City. This network will help deliver the refreshed SPC by setting out a city cycle network which incorporates on road and off-

road elements and sections through development sites. Both the SPC and Network will be the subject of public engagement in due course. In the meantime, the Plan will require new developments to be designed to promote and facilitate walking and cycling, through Policy CDP11.

No modifications recommended.

00633/18/010 Strathclyde Partnership for Transport - Policy CDP11 states that the Council will direct major developments to locations well served by existing public transport services and active travel routes. The Council intends to bring forward Supplementary Guidance to support this policy position. This will likely reflect City Plan 2 policy TRANS 2: Development Locational Requirements and Development Guides DG/TRANS 1 and DG/TRANS 2 in providing guidance on the required level of public transport accessibility for certain scales and types of new development (CE17). Policy CDP11 of the Plan indicates that new development will require to be designed to promote and facilitate walking and cycling, including direct connections to the walking and cycling network.

No modifications recommended.

#### Supporting

00637/21/002 Dowanhill Hyndland and Kelvinside Community Council, 00669/1/001 Transform Scotland, 00633/18/006 Strathclyde Partnership for Transport - Noted.

No modifications recommended.

#### **Reporter's conclusions:**

##### Car-free development

1. The representation seeks to have car-free development as the standard in the inner city area, rather than only on "suitable sites" as set out in Policy CDP11. The council has responded by stating that car free development can only be supported in locations where there are controlled parking zones in place and in areas of high access to public transport. The council intends to put in place Supplementary Guidance (SG) which will set out the criteria for car-free development in the city. It is intended to reflect the current criteria as set out in City Plan 2.

2. Policy CDP11 is clear in that car free development will be supported, not just in the inner city but across the Proposed Plan area. I consider that the approach of the council is reasonable, in that there may be sites which cannot currently support car-free development for reasons such as access to quality public transport, proximity to services, surrounding traffic restrictions, etc. The proposed SG should reflect the criteria currently set out in City Plan 2 RES 7, and enable the council to assess such proposals. The modification sought in the representation seeks to have the reference to "suitable" removed from the set of bullet points in Policy CDP11. I conclude that the retention of the reference to "suitable" is appropriate in this instance, as a site assessment will be required to determine suitability for each proposal, in accordance with the proposed SG. I recommend no modification to the Proposed Plan.

### Mapping strategic outcomes

3. The objectives and Strategic Outcomes as set out page 22 of the Proposed Plan are supported by objectives which are also set out on page 22. The representation is concerned that these objectives are not clearly set out on the Proposals Map, and are not sufficiently illustrated on Figure 19 on page 57 of the Proposed Plan.

4. The council responds that Figure 19 illustrates the key infrastructure elements of the Plan, the Proposals Map illustrates key projects and that SG will also provide further guidance and information. The council considers that some of the objectives are not 'map-able' or capable of being illustrated on a map or plan or in a figure.

5. I agree with the council that many of the objectives and strategic outcomes of the Proposed Plan as set out at page 22 "A Connected Place" are simply not 'map-able'. Where this is the case, I have found that the objectives and outcomes are clearly identified in either the context or in the relevant Policy itself. For example, supporting higher density development in suitable locations is addressed in Policy CDP2, but is not an objective that can easily be mapped or illustrated. I conclude that the modification requested in the representation cannot be accommodated.

### Effective use of road space

6. An additional bullet point is sought on page 22 "A Connected Place", seeking a reference to the most efficient use of road space, to further enable public transport and travel movement on the key corridors in the City.

7. The council has responded saying that the local development plan has little control over public roads, and the efficient use of such roads is not a matter that can be addressed by the Proposed Plan.

8. Although the efficient use of road space is not a matter that can be directly addressed by this Plan, I find that the Strategic Approach "A Connected Place" implicitly includes a presumption that sustainable transport and travel will be efficient, in making the best use of existing transport infrastructure and identifying suitable locations for development. Including a specific reference to "efficient use" would imply a level of control over road space that the council cannot deliver through this Plan. I recommend no modification to the Proposed Plan.

### Town centre development proposals

9. Concerns are raised that safeguarded land for transport infrastructure may have a detrimental impact on town centre development investment by restricting development proposals. The representation did not specify which town centre, and the comment appears to apply to the whole of the Proposed Plan area.

10. The council has responded by saying that the Proposed Plan's strategy intends to enhance town centres by increasing accessibility and while there might, in individual circumstances, be an impact arising from a transport proposal, the wider public interest of improving accessibility and facilities would prevail.

11. I agree that in some instances, there may be an impact on development proposals as result of the safeguarding of land in the Proposed Plan, but elsewhere in this

examination, notably at Issue 49, we have reappraised the need to safeguard land for individual transport projects. Those transport projects that remain in the Proposed Plan have been through the appropriate assessment processes, and have been identified as contributing to the required strategic outcomes of this Plan. The potential for a detrimental impact on an individual development proposal is a matter that could be addressed at the planning application stage. I recommend no modification to the Proposed Plan.

#### A compact city form

12. The representation objects to the parking and open space requirements as set out in the Proposed Plan, on the basis that they limit the ability of development proposals to deliver a compact city form as required by the Strategic Development Plan.

13. Supplementary Guidance is proposed in the Proposed Plan to address the requirement for parking standards in development proposals. Whilst the precise standards are not yet known, Background Paper 11 (OC45) suggests that the standards as set out in TRANS 4 City Plan 2 will not be significantly altered. Open space standards are being reviewed in the Open Space Strategy and it is likely that different quantitative standards will be used to reflect the differing residential density in various locations.

14. In terms of parking standards, the present TRANS 4 allows for flexibility in the application of the current parking standards, dependant on local circumstances. The council has stated that it intends the proposed SG to include such an approach.

15. If SG reflects the flexibility of TRANS 4, and differing open space standards are applied to development proposals in different locations, then I find that the SDP spatial development strategy of a compact city model could be met. The specific standards and flexibility to allow this approach will be set out in SG which is not before this examination, but the approach of the council is noted. I conclude that there should be sufficient flexibility in the application of the parking and open space standards to meet the concerns expressed in the representation, and recommend no modification to the Proposed Plan.

#### City centre transport

16. The representation seeks to have the redevelopment of Queen Street Station reflected in the Proposed Plan.

17. The council considers the works to be an intensification of an existing use, and therefore not a land use proposal, it does consider that for clarity, the project could be reflected in the Context section of Policy CDP11.

18. I agree that in order to provide a full picture of the proposed EGIP and associated projects in the City, the redevelopment of Glasgow Queen Street should be identified. The council has suggested that additional text be inserted after the first paragraph of the Policy CDP11 context, and I recommend that the Proposed Plan be modified accordingly.

#### M8 Junction 15 - Duke Street link

19. The representation seeks to safeguard land to deliver an extension of the M8 Junction 15 sub-surface link to Duke Street, removing traffic from the Cathedral Precinct.

20. In its response, the council says that the scheme was not included in City Plan 2,

and was not included in the Main Issues Report for the Proposed Plan and so was not subject to consultation with the public or key agencies. In addition, the land required to potentially deliver the scheme has now been developed for residential purposes.

21. In the absence of any appraisal or committed funding from any key agency, and as the land required to deliver the link has now been developed, I find that the safeguarding of the potential link route is not appropriate. I recommend no modification to the Proposed Plan.

### City Centre Transport Strategy

22. The inclusion of the City Centre Transport Strategy (CCTS) in the Proposed Plan and Action Programme is sought by these representations, as the CCTS represents the most up to date position of the transport network.

23. The council agrees that the CCTS will be a material consideration in determining planning applications, and that many of the proposals of the CCTS will be incorporated into the proposed City Centre District Local Development Frameworks (LDFs) to be brought forward as Supplementary Guidance to support both the Proposed Plan and the CCTS. The Proposed Plan will not set out all of the proposals in the CCTS, as some relate to public roads and cannot be addressed in a local plan.

24. I find that given the close relationship between the two documents, and the proposal for SG which will set out the CCTS proposals as they relate to the City Centre Districts, it would be reasonable to make specific reference to the CCTS in Policy CDP11, especially given the council's stated intention of relying on it as a material consideration in the determination of planning applications. The Proposed Plan should be modified accordingly.

### City centre car parking

25. Concerns are expressed in the representations about the potential impact that restricted availability of car parking in the city centre could have on future shoppers, when compared to the availability of free car parking at out of centre locations. The representations acknowledge the emphasis on other modes of transport that the Proposed Plan is supporting, but remain concerned about the potential impact on the vitality and viability of the city centre.

26. The council has responded saying that Policy CDP11 states that existing car parking levels in the city centre will be maintained until the City Centre Strategic Development Framework (SDF) and LDFs are adopted, as the levels of parking to be provided in the city centre will be identified within those documents. The council is undertaking a city centre parking review to inform the SDF and LDFs, but it is not yet complete. Initial findings are that there is sufficient off-street parking to meet the demand generated, and that existing parking is not used to capacity. It is expected that the review will recommend that no additional parking be provided in the city centre.

27. A number of temporary car parks have been permitted in the city centre, prior to the sites being developed for their eventual purpose. As the sites have not been developed, and the parking review has identified that there is sufficient capacity in the permanent parking supply, the council will no longer support proposals for temporary car parks unless as an interim measure when permanent car parks are not available.

28. Having reviewed the representations made, they appear to be in principle and do not provide any evidence to support the concerns expressed, or to address the specific context of Glasgow city centre. I have no evidence before me to demonstrate how retaining the current level of parking provision might have a detrimental impact on vitality and viability, or how that level of car parking provision might deter future shoppers.

29. I expect that the SG in the form of the SDF and LDFs will provide certainty in relation to the actual levels of car parking provision in the city centre. The council is not obliged to produce SG in conjunction with the Proposed Plan, but can produce it afterwards if it is justified by the policy content of the Plan. In this instance, the proposed SG will not be available for public comment until after the Proposed Plan is examined and adopted. I agree that without the detailed guidance setting out how car parking levels in the city centre will be applied, there is limited clarity at this point in time for communities and developers. However, this is not a matter that can be resolved through the current examination process, where I can only have regard to the material forming part of the Proposed Plan as submitted for examination. Any SG prepared to form part of the development plan at a later stage will follow the appropriate public consultation period, at which point submissions can be made.

30. I note that the Proposed Plan is not proposing a significant reduction in city centre car parking or a taking a restrictive view on car parking, and so conclude that there should be no modification to the Proposed Plan.

#### Pedestrian route from Trongate to Argyle Street

31. The extension of the existing pedestrian route from Argyle Street along Trongate is sought in this representation, increasing pedestrian permeability and allowing public transport only.

32. The council has responded by stating that the CCTS makes provision for public realm improvements, including Argyle Street and Trongate. The actual use of public roads is not a matter that can be addressed by the Proposed Plan.

33. I find that the recommended modification to include a specific reference to CCTS as set out in paragraph 24 above should assist in providing clarity as to what public realm improvements are being proposed. Although the Proposed Plan cannot directly make proposals for public roads, it can provide the context and justification for improvements to the city centre. Many of the proposals of the CCTS will be incorporated into the proposed City Centre District LDFs to be brought forward as Supplementary Guidance to support both the Proposed Plan and the CCTS. The Proposed Plan will not set out all of the proposals in the CCTS, as some relate to public roads and cannot be addressed in a local development plan, such as those affecting Argyle Street and Trongate. I recommend no modification to the Proposed Plan.

#### Promoting walking and cycling

34. Representations are seeking a greater focus on the delivery of sustainable transport, as it was felt that the tone of this part of the Proposed Plan is too aspirational and does not focus on the delivery of actual projects. It is suggested that potential new routes should be identified on the Policy and Proposals Map, especially links to the Southside. Key sites for the delivery of an active travel network should be identified across the City. A commitment is also sought as to the standard of walking and cycling facilities to be

provided in the City.

35. The council considers that the Placemaking Principle and the Sustainable Spatial Strategy of the Proposed Plan both promote active travel in the City. Where possible, the Proposed Plan and associated SG make reference to examples and specific proposals for walking and cycling infrastructure and specific reference is made to the CCTS. The Strategic Plan for Cycling (SPC) is in the process of being refreshed. The council says it has little control over the actual use of public roads, and that the physical infrastructure required to deliver routes and manage road space are matters outside the remit of the Proposed Plan.

36. Having reviewed the relevant parts of the Proposed Plan and the over-arching policies CDP 1 and 2, I find that the references to the delivery of walking and cycle routes could be made more explicit. There is an obvious commitment on the part of the council to facilitate such development, and the review of the SPC will provide details of the city cycle network of deliverable routes. I agree that a reference to the SPC in Policy CDP11 would add focus on the actual delivery of routes in the City. The council has suggested additional text be added to the Policy, and I recommend that the Proposed Plan be modified accordingly. The suggested text will provide clarity and direction for users of the Proposed Plan.

37. The standard of infrastructure to be provided is questioned, and a modification sought to make specific reference to internationally recognised best practice for infrastructure standards, such as the Crow manual, in Policy CDP11.

38. I find that the Council's Design Guide for New Residential Areas (OC34) and Scottish Government's Cycling by Design should ensure that any proposal for new routes is assessed against the relevant standards in place at the time the proposal is made. The SG intended to support Policy CDP11 will make reference to both documents. I conclude that a reference to specific international standards in Policy CDP11 is not necessary as there is appropriate guidance in place, and so there should be no modification to the Proposed Plan.

39. A number of routes have been identified on Figure 19 of the Proposed Plan, and the representation seeks to add a route taking people from the Southside to the Broomielaw/IFSD, via the Tradeston Bridge. It is suggested that two development sites on Maxwell Road, H073 and H081 could facilitate delivery. The representation seeks to have the route included on Figure 19.

40. The council agrees that the proposed route could be beneficial, and that it could be a key link in connecting the Southside for cyclists and pedestrians. The council agrees that the route be identified on Figure 19 to ensure delivery should development proposals on the sites in Maxwell Road be submitted.

41. I find that the proposed route should improve connectivity to the Southside for cyclists and pedestrians, and would be in accordance with the over-arching policies CDP 1 and 2 of the Proposed Plan, in that it would promote active travel and a compact city form. The council has suggested that the additional route be added to the Policy and Proposals Map, and I recommend that the Proposed Plan be modified accordingly.

42. Potential safety risks arising from the conflict between cyclists and pedestrians using shared routes are identified in one representation, and a modification to Policy CDP11 is



sought to identify those risks.

43. The council has responded by advising that shared routes will be required to be delivered in accordance with the appropriate guidance and SG, and that shared use can be appropriate where it can be demonstrated that any potential conflict has been resolved. It is not considered appropriate for the Proposed Plan to include detailed design guidance for active travel routes.

44. I find that the Council's Design Guide for New Residential Areas (OC34) and Scottish Government's Cycling by Design and the SG associated with Policy CDP11 should ensure that any proposal for new routes is assessed against the relevant standards in place at the time the proposal is made. The SG intended to support Policy CDP11 will make reference to both documents. I conclude that a reference to safety standards in Policy CDP11 is not necessary as there is appropriate guidance in place, and so there should be no modification to the Proposed Plan.

#### Dumbarton Road and Plean Street

45. Improved public transport links on Dumbarton Road and an extended car park at Plean Street are sought in this representation. There is no additional information with the representation that explains the basis for the modification sought. I deduce from reading the representation that the current traffic levels are giving rise to concerns regarding pollution levels, noise and speeding cars.

46. The council says that current public transport on Dumbarton Road is good and that the proposed Fastlink system and North Clydeside Development Route (NCDR), Issues 50 and 51 respectively, should take traffic off Dumbarton Road, thereby improving conditions. The proposed NCDR and Fastlink, and the potential for a new road bridge at Yoker all have the potential to radically change current traffic patterns in this part of the City. Through City Deal, Renfrewshire Council are bringing forward plans for a bridge across the Clyde, which if delivered could have major implications for traffic movement in the Clydeside area. As part of the council's response to Issue 51, a study of traffic and transport issues in north west Glasgow has been proposed. This study is not yet complete, but may mean that the current transport proposals in the Proposed Plan for this area could be subject to change and amendment. The study will offer the opportunity to review public transport provision in the area, which will address the issues raised in the representation. I recommend no modification to the Proposed Plan.

47. The car park at Plean Street appears to be functioning well, and at the time of my visit did not appear to be over capacity. There is no other evidence or additional information before me to suggest that the car park needs to be extended or that demand for parking is estimated to increase in the Plan period, and I conclude that the representation seeking the extension of the car park at Plean Street as a plan proposal is not supported.

#### Clydeport

48. The representation seeks to have the King George V Dock and the role it plays in the sustainable movement of freight explicitly identified in the Proposed Plan. Policy CDP11 makes reference to the role of the river, but does not identify the port terminals. A modification is sought to identify the Dock in Policy CDP11.

49. The council agrees that the Proposed Plan could specifically recognise the important role of the freight facilities on the Clyde. Although not specifically identified in the Glasgow and Clyde Valley Strategic Development Plan 2012, the emerging SDP in the Main Issues Report identifies King George V Dock as the preferred option for a strategic freight hub on the Clyde. The council supports the requested modification and has suggested additional text to be included in Policy CDP11.

50. I find that although the current text of Policy CDP11 at the first bullet point makes reference to “existing transport infrastructure”, a specific reference to strategic freight hubs and King George V Dock would add clarity to the Proposed Plan. I recommend that the Proposed Plan be modified by the inclusion of the suggested text at bullet point 1 and an additional entry to the Glossary.

#### Re-regulation of buses

51. The re-regulation of the bus services in the city, as a means to improve public transport and reduce traffic and parking is sought in this representation.

52. The council has responded by advising that re-regulation of the bus services in Glasgow would require a change to national legislation, and is not a matter that the Proposed Plan can address.

53. I agree with the position of the council. The re-regulation of the bus services in Glasgow is not within the remit of the local development plan, and so there is no modification to the Proposed Plan.

#### Park and ride facilities

54. An increase in park and ride facilities in “out of city” locations is sought to improve public transport and reduce the demand for parking in the West End of the city.

55. The council is supportive of park and ride facilities in general, but cannot control provision outside the city boundary. The new railway station at Robroyston will provide park and ride facilities.

56. I find that Policy CDP11 is generally supportive of transport infrastructure, which would encompass park and ride facilities when required by development proposals. A specific reference to such facilities is not necessary, as I conclude the current wording of the policy would permit such developments. There is no modification to the Proposed Plan.

#### Improving active travel and public transport links

57. Representations are seeking a clear strategy for the delivery of sustainable transport, in the form of active travel routes and public transport links. Concern is expressed about the perceived reliance of new roads. Potential new routes, both strategic and local, should be identified on the Policy and Proposals Map and in the Proposed Plan. Key sites for the delivery of an active travel network should be identified across the City.

58. The council considers that the Placemaking Principle and the Sustainable Spatial Strategy of the Proposed Plan both promote active travel and public transport in the City.

Where possible, the Proposed Plan and associated SG make reference to examples and specific proposals for walking and cycling infrastructure and specific reference is made to the CCTS. The Strategic Plan for Cycling (SPC) is in the process of being refreshed. The council says it has little control over the actual use of public roads, and the physical infrastructure required to deliver routes and manage road space are matters outside the remit of the Proposed Plan.

59. Having reviewed the relevant parts of the Proposed Plan and the over-arching policies CDP 1 and 2, I find that the references to the delivery of walking and cycle routes could be more explicit in the Proposed Plan. There is an obvious commitment on the part of the council to facilitate such development, and the review of the SPC will provide details of the city cycle network of deliverable routes. I find that the Council's Design Guide for New Residential Area (OC34) and Scottish Government's Cycling by Design should ensure that any proposal for new routes is assessed against the relevant standards in place at the time the proposal is made. The SG intended to support Policy CDP11 will make reference to both documents. I have recommended a modification to the Proposed Plan at paragraph 36 of this issue, which I consider addresses the matters raised in the representation.

#### Representations on Issue 48 supporting the Proposed Plan

60. The comments and submissions from parties supporting Policy CDP 11 are noted, but they do not alter my conclusions and recommendations.

#### **Reporter's recommendations:**

Modify Policy CDP11, Context, with the addition of the following text after paragraph 1:

*“Network Rail has plans to redevelop Queen Street Station as part of the Edinburgh Glasgow Improvement Programme (EGIP), helping meet projected growth in passenger volumes.”*

Modify Policy CDP11 with the addition of the following new paragraph after the first set of bullet points:

*“The Council has produced a City Centre Transport Strategy that will inform Spatial Supplementary Guidance in the City Centre and that constitutes an important material consideration in determining planning applications in the City Centre and surrounding areas”.*

Modify the final paragraph of Policy CDP11 by inserting new text after the first sentence as follows:

*“Work has recently started to refresh Glasgow's Strategic Plan for Cycling (SPC) 2010-2020. The Council has also been working with Sustrans to identify a network of deliverable cycle routes throughout the City. This network will help deliver the refreshed SPC by setting out a city cycle network which incorporates on road and off-road elements and sections through development sites. Both the SPC and Network will be the subject of public engagement in due course and, when adopted, will be considered material considerations.”*

Add a notation to the Policy and Proposals Map illustrating the pedestrian/cycle link

between Pollokshields, West Street Underground and the Tradeston Bridge.

Replace bullet point 1 with the following text:

*“existing transport infrastructure (including the River Clyde, Forth and Clyde Canal and strategic freight hubs) from inappropriate development”*

Add the following definition to the Glossary:

*“Strategic Freight Hubs: freight facilities that have an important economic role in supporting modal shift and the transportation demands of the key sectors, such as King George V Dock”*

Issue 49	Rail	
Development plan reference:	Policy CDP 11 Sustainable Transport (Pages 56-58) Policy and Proposals Map	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
ROCK DCM (00006) Glasgow Barrowland (00067) Anthony Lennon (00177) Ron McLean (00415) Patricia Ferguson MSP (00420) Alastair Ewen (00428) The Untouchables (Scotland) Ltd (00446) Hillhead Community Council (00479) Roderick McDougall (00507) Ken Sutherland (00556) Pollokshields Community Council (00609) Glasgow Harbour Ltd (00610) Scottish Government (00621) Yorkhill and Kelvingrove Community Council (00623) Strathclyde Partnership for Transport (00633) Andrew Heatlie (00641) Transform Scotland (00669)		
Provision of the development plan to which the issue relates:	Policy CDP 11 - Sustainable Transport's approach to the development of the rail network in the City, including new lines, the safeguarding/re-opening of former lines and the safeguarding/opening of new stations.	
Planning authority's summary of the representation(s):		
<u>Crossrail</u>		
<u>Objecting</u>		
00006/1/001 ROCK DCM - Wishes to see the Crossrail project included in The Plan, including the continued safeguarding of the High Street Curve component and the creation of Glasgow Cross Station. It would have major urban regeneration benefits to the Glasgow Cross/Calton areas and the wider East City Centre.		
00415/1/003 Ron McLean - Wishes to see the reinstatement of the City Plan 2 rail proposal for the Crossrail scheme. The electrifying and upgrading of the Shields Road - Bellgrove city union line, as the first step towards ultimate implementation of the full Crossrail project, would be beneficial.		
00420/1/002 Patricia Ferguson MSP - Wishes to see the reinstatement of the City Plan 2 proposal for Crossrail, with a station at Glasgow Cross.		
00446/1/003 The Untouchables (Scotland) Ltd - Strongly support the achievement of the Crossrail route through the eastern part of the City Centre. A new rail line with a station at Glasgow Cross would be of immense assistance in improving the accessibility of this area and be of significant benefit to the effort to encourage new business and residential		

development as part of essential urban regeneration for this area.

00067/1/001 Glasgow Barrowland - Wishes to see the Crossrail project included in The Plan, including a "hub" interchange with the Argyle line at a Glasgow Cross Station. This new public transport link into the heart of the area would be hugely beneficial in terms of vastly improved accessibility to an area which some regard as "cut off" from the main City Centre areas of major retailing and trade. The Crossrail link would encourage commercial development and employment in the wider Gallowgate/London Road/Calton area of economic need and social opportunity.

00177/3/005 Anthony Lennon - Wishes to see reinstatement of Crossrail and the stations proposed on the Crossrail route. This will enhance connection of north and south rail networks, provide interchange possibilities, enhance strategic connectivity/links e.g. Ayrshire to East of Scotland.

00556/1/001 Ken Sutherland - Wishes to see the policy safeguard land required for Crossrail. Supports The Plan's ambition to achieve much of the Crossrail project including its intended stations at Glasgow Cross (interchanging with the Argyle Line): Gorbals: West Street (Interchanging with the Subway) and safeguarding the Strathbungo Link and retention of a Kelvinhaugh Turnback option. Studies have confirmed these are technically achievable, hugely desirable in social, economic, employment and environment terms, and deliver a strong business case.

00609/3/002 Pollokshields Community Council - Welcomes the continued pursuit of Crossrail. Greater reference should be made to the benefits of Crossrail in the Policy section.

### High Street Curve

#### Objecting

00415/1/008 Ron McLean - Wishes to see the reinstatement of the City Plan 2 rail proposal for the High Street Curve (St John's Link). Construction of the High Street Curve, as part of the Crossrail scheme, would allow future services to run from High Street westward to Glasgow Queen Street Low Level and Charing Cross, delivering further modal shift benefits/opportunity of a more efficient and competitive rail services

00428/1/001 Alastair Ewen - Wishes to see the reinstatement of the City Plan 2 rail proposal for the High Street Curve (St John's Link) as an essential part of the Crossrail project. This is essential to the development of an integrated rail network in Glasgow.

00446/1/001 The Untouchables (Scotland) Ltd - Wishes to see the reinstatement of the City Plan 2 rail proposal for the High Street Curve (St John's Link) as an essential part of the wider Crossrail project. As a major retailer on the eastern edge of the City Centre, our company would strongly support the Crossrail route. A station at Glasgow cross would be of immense assistance in improving the accessibility of this area and be of significant benefit to the effort to encourage new business and residential development as part of essential urban regeneration for this area. The High Street curve should continue to be safeguarded for improved access through to the west of the City Centre and linking into services into the south of Glasgow and Lanarkshire.

00507/1/014 Roderick McDougall - Wishes to see the policy safeguard land required for

potential new rail passenger access points (stations) including (but not exclusively) relocation of High Street Station westwards to accommodate the High Street Curve.

00507/1/002 Roderick McDougall - Wishes to see the reinstatement of the City Plan 2 rail proposal for the High Street Curve. Rail is the most sustainable form of transport after walking and cycling as well as being the most efficient form of mass transport. It is therefore incumbent on the City and the rail authorities to make it as accessible and attractive as possible to the largest number of citizens possible in order to encourage the maximum mode shift to sustainable transport. This new rail link is designed to improve the connectivity of the rail network across and around the City. Examination of the Census figures shows that 40% of commuters from the south of the river travel to postcodes better served by stations/ proposed stations on the Crossrail network, which the above proposal would allow, than postcodes served by Central Station.

00177/3/001 Anthony Lennon - Wishes to see the reinstatement of the City Plan 2 rail proposal for the High Street Curve (St John's Link) and the safeguarding of any land required for the construction of the curve. This greatly enhances and adds to the local, regional and national benefits and potentials of the Crossrail project including improved accessibility to major retail, education and business areas and facilities. It could relieve potential capacity problems at Central Station and allows increases in frequencies for various routes and for various new route possibilities. It adds considerably to the potential benefits of the Kelvinhaugh turn back scheme and any future reinstatement of the Strathbungo Link.

00556/1/006 Ken Sutherland - Wishes to see the reinstatement of the City Plan 2 rail proposal for the High Street Curve (St John's Link). The connectivity and accessibility value of this route has been repeatedly acknowledged. The Developer of the site on which the link would be located has indicated a possible willingness to engage in collaborative discussion on how its development might incorporate a form of site layout safeguarding for this link. The value of improved ScotRail connectivity is confirmed by the reopened Bathgate-Airdrie line directly connecting with the North Clydeside electric routes.

00609/3/005 Pollokshields Community Council - Wishes to see the reinstatement of the City Plan 2 rail proposal for the High Street Curve (St John's Link). This would offer potential, as part of the wider Crossrail scheme, for direct travel from neighbourhoods on the Southside and East Kilbride/Barrhead lines through the City Centre to Queen Street and Charing Cross Stations. It would enable: better penetration of the City Centre; an increased service frequency required for East Kilbride/Barrhead lines; urban regeneration of vacant and underutilised land or building stock around the proposed stations at West Street, the Citizens Theatre and Glasgow Cross; and modal shift away from car commuting.

00479/7/002 Hillhead Community Council - Wishes to see the reinstatement of the City Plan 2 rail proposal for the High Street Curve (St John's Link) for light rail rapid transport. SPP does not say that proposals should be delivered in the lifetime of the Plan. Light rail rapid transport would enable the integration of modes. Land for cross- Glasgow connections should be preserved - the economic benefits of connections are not confined to Edinburgh-Glasgow routes but are vital for Glasgow itself and will help encourage non-car travel from outlying areas.

00641/1/001 Andrew Heatlie - Wishes to see the reinstatement of the City Plan 2 rail

proposal for the High Street Curve as part of a wider Crossrail scheme, including use of the City Union line. This is vital for enabling West - South services and revitalising the surrounding areas from Calton to the Merchant City. To a great extent the future redevelopment of our City Region depends upon Crossrail. Its construction will facilitate the regeneration of the area lying between High Street, London Road, Abercrombie Street & Bellgrove Street, and Duke Street. It also enhances services to the proposed High Speed rail terminal. Crossrail is also a vital element in enabling nationwide train journeys to/from Glasgow International Airport, with associated economic prosperity and passenger convenience. It is understood that the developer of proposed student flats is happy to reserve the land for the link.

### Other Crossrail Stations and Routes

#### Objecting

00415/1/004 Ron McLean - Wishes to see the reinstatement of the City Plan 2 rail proposal for the Strathbungo Link. The Strathbungo rail link allows direct service opportunities from East Kilbride/Barrhead lines catchment area to Glasgow Queen Street low level as part of a Crossrail scheme.

00415/1/005 Ron McLean - Wishes to see the reinstatement of the City Plan 2 rail proposal for the Kelvinhaugh Turnback option.

00507/1/017 Roderick McDougall - Wishes to see the policy safeguard land required for potential new rail passenger access points (stations) including (but not exclusively): Glasgow Cross (interchange with the Argyle Line); Citizens (Gorbals); and West Street (interchange with the Underground). The proposed stations fill the gaps in the network at locations likely to attract the maximum number of new passengers either from their home location or to their destination.

00507/1/003 Roderick McDougall - Wishes to see the policy safeguard land required for the Muirhouse Link. Rail is the most sustainable form of transport after walking and cycling as well as being the most efficient form of mass transport. It is therefore incumbent on the City and the rail authorities to make it as accessible and attractive as possible to the largest number of citizens possible in order to encourage the maximum mode shift to sustainable transport. The Muirhouse Link is designed to improve the connectivity of the rail network across and around the City. Examination of the Census figures shows that 40% of commuters from the south of the river travel to postcodes better served by stations/ proposed stations on the Crossrail network, which the above proposal would allow, than postcodes served by Central Station.

00621/8/003 Scottish Government - Bullet Point 6 of policy CDP 11 Sustainable Transport should be reworded to remove reference to stations at Glasgow Cross, West Street and Gorbals. These are not part of Strategic Transport Projects Review Project 24 and Transport Scotland have no intention of implementing a Crossrail scheme - it would not make best use of the rail network or integrate well with the objectives of the STPR. Transport Scotland are not aware of progress on any further studies or appraisals in relation to services on the City Union line or the stations identified - interventions should not be included within the Plan until appropriate appraisal is complete. Reference to the stations should be removed from the Plan. Figure 19 should be revised accordingly.

00479/7/001 Hillhead Community Council - Wishes to see the policy safeguard the City



Union Line for light rail rapid transport. SPP does not say that proposals should be delivered in the lifetime of the Plan. Light rail rapid transport would enable the integration of modes. Land for cross-Glasgow connections should be preserved - the economic benefits of connections are not confined to Edinburgh-Glasgow routes but are vital for Glasgow itself and will help encourage non-car travel from outlying areas.

### Supporting

00609/3/003 Pollokshields Community Council - Strongly agrees with safeguarding of the land upon which the West Street interchange station would be built as part of the Crossrail scheme. The proposed West Street interchange station between the Subway and High Level Ayrshire line could be a Southside equivalent to Partick Station in the West End. This could be a significant fillip to urban regeneration of derelict sites between East Pollokshields, Tradeston and Laurieston and could reduce severance on the Southside.

### Garngad Chord

### Objecting

00415/1/001 Ron McLean - Wishes to see the reinstatement of the City Plan 2 rail proposal for a Garngad Chord. The absence of this short link is highly prejudicial to rail's credibility as a transport mode in the Cumbernauld corridor. It will weaken the social/economic benefit of electrifying of the line, given the 10min time now imposed by the 4km detour and antiquated train-reversal 'curiosity' required at Springburn. Reinstating the chord would allow the Cumbernauld service to be competitive with the car/bus and allow for through services to Ayrshire/Renfrewshire/Glasgow Airport via Glasgow Crossrail from Edinburgh via Falkirk Grahamston and Cumbernauld.

00420/1/003 Patricia Ferguson MSP - Wishes to see the reinstatement of the City Plan 2 proposal for a Garngad Chord, to allow rail to compete with the car on the M80 corridor and to avoid the unnecessary and antiquated reversal at Springburn station.

00507/1/001 Roderick McDougall - Wishes to see the policy safeguard land required for the Garngad Chord. Rail is the most sustainable form of transport after walking and cycling as well as being the most efficient form of mass transport. It is therefore incumbent on the City and the rail authorities to make it as accessible and attractive as possible to the largest number of citizens possible in order to encourage the maximum mode shift to sustainable transport. The Garngad Chord is designed to improve the connectivity of the rail network across and around the City.

00177/3/006 Anthony Lennon - Wishes to see the reinstatement of the City Plan 2 rail proposal for a Garngad Chord. This should have been, along with the Almond Chord, one of the major preliminary projects of the Edinburgh Glasgow Improvements Programme (EGIP). In addition to its important use in the completed EGIP scheme, it would have provided important diversionary possibilities in the construction phase of the EGIP scheme. It was an important element in the original EGIP programme before it was substantially cut. By not having the chord, the newly electrified Cumbernauld line is put at a significant competitive disadvantage as compared to car/bus on the parallel M80 route. The need to reverse at Springburn to access Queen St Low Level adds ten minutes to the previous diesel worked service.

00556/1/002 Ken Sutherland - Wishes to see the policy safeguard land required for Garngad Chord. Absence of this short link is highly prejudicial to rail's competitive credibility on the Cumbernauld line (even electrified) when compared against M80 car/bus travel, given the 10 minute time penalty addition now imposed by the absurd 4 km detour and antiquated train-reversal 'curiosity' required at Springburn station. Usage and competitive credibility of proposed Robroyston Station will be substantially weakened without the Garngad Chord.

00479/7/003 Hillhead Community Council - Wishes to see the policy safeguard the Garngad Chord for light rail rapid transport. SPP does not say that proposals should be delivered in the lifetime of the Plan. Light rail rapid transport would enable the integration of modes. Land for cross- Glasgow connections should be preserved - the economic benefits of connections are not confined to Edinburgh-Glasgow routes but are vital for Glasgow itself and will help encourage non-car travel from outlying areas.

00641/1/002 Andrew Heatlie - The Plan should protect land required for the Garngad Chord, originally in the Scottish Government's Edinburgh Glasgow Improvement Programme initiative, but illogically ditched later.

### Glasgow Airport Access

#### Objecting

00415/1/002 Ron McLean - Wishes to see the reinstatement of the City Plan 2 rail proposal for the Glasgow Airport Heavy Rail Link. Although a recent report has suggested that a light rail/tram might be an option, this has limited scope. It could only accommodate tram/train into Glasgow Airport for the critical last mile, and would permanently deny access to a full range of SPT commuter and Scot Rail services to capitalise on growth and new market opportunities. The cost of tram/train is unknown and could not meet Glasgow Airport's ambition to offer passengers benefits of direct/through services to a range of key markets opportunities, especially central Scotland and Edinburgh. Heavy rail would allow full inter-running/integration connectivity with other lines/routes destinations on Britain's current rail network.

00420/1/005 Patricia Ferguson MSP - Wishes to see the reinstatement of the City Plan 2 proposal for a Glasgow Airport Rail Link. Glasgow's aspiration to grow the number of visitors to the City and to become a destination of choice for visitors and a venue for major events needs to have an easily accessible rail link.

00428/1/002 Alastair Ewen - Wishes the Council to continue to support the Glasgow Airport Rail Link which is related to the Crossrail project. It is essential to Glasgow's future development that the Glasgow Airport has a heavy rail mass transport service which can move hundreds of people at a time via the City through to Edinburgh.

00446/1/002 The Untouchables (Scotland) Ltd - Wishes to see the reinstatement of the City Plan 2 rail proposal for a Glasgow Airport Rail Link. The Council should continue to lobby for a direct rail route to Glasgow Airport which was promised and would deliver a 'double bonus' in travel opportunity benefit for our area if it was achieved along with Crossrail.

00177/3/004 Anthony Lennon - Wishes to see the reinstatement of the City Plan 2 rail proposal for a 'Heavy Rail' Link to Glasgow Airport. This has important implications for

the City and especially for the City Centre and a rail link proposal should be incorporated into the new Plan. It should be 'heavy rail' and not some variant of 'light rail/tram train'. A heavy rail link has many advantages over any light rail/tramline scheme, including overall cost, depot facilities, unit cost/availability/complexity, station availability, comfort, speed, capacity, train access to national network etc. Of the several heavy rail schemes proposed, the most recent NewGarl proposal by RailQwest is best in terms of design, operating/capital costs/financing, terminal design/location etc.

00556/1/010 Ken Sutherland - Wishes to see the Plan continue to state a commitment to secure a heavy rail link to Glasgow Airport rather than a cheaper tram-train link. The explanation for the lack of such a link in Background Paper 11 is bureaucratically over-restrictive. The City Council's City Centre Transport Strategy Consultation supports a rail link to Glasgow Airport as an enhancement to the rail network.

00633/18/004 Strathclyde Partnership for Transport - Context (page 56): Include reference to the outcomes of the Glasgow Airport Strategic Transport Study.

### High Speed Rail

#### Objecting

00177/3/003 Anthony Lennon - Wishes to see the Plan safeguard feasible potential sites for a future High Speed Rail terminal.

00556/1/011 Ken Sutherland - Wishes to see the Plan safeguard potential sites for a future High Speed Rail terminal.

00621/8/002 Scottish Government - Bullet Point 5 of policy CDP 11 Sustainable Transport should be reworded to remove reference to the safeguarding of land for a potential High Speed Rail station. This is currently being studied by the Scottish Partnership Group and the Plan must comply with the SDP, which states that, following the identification of location in Glasgow for a HSR terminus by the Scottish Partnership Group, the Council should secure and safeguard related land. It is considered inappropriate that land should be safeguarded at Central Station and High Street prior to the findings of the Partnership Group.

### Rail Stations

#### Objecting

00177/3/002 Anthony Lennon, 00420/1/001 Patricia Ferguson MSP - Wishes to see the reinstatement of the City Plan 2 proposal for a rail station at Blochairn/Garngad.

00507/1/011 Roderick McDougall - Wishes to see the policy safeguard land required for potential new rail passenger access points (stations) including (but not exclusively) Blochairn.

00556/1/007 Ken Sutherland - Wishes to see the policy safeguard land required for pursuing the opportunity for additional new station at Blochairn/Garngad. Do not agree that a station here would be 'too close to the City Centre to offer attractive journey times'. It would have a significant catchment population of 3,500 and easy access to industry/employment. A household survey should be undertaken to assess demand

potential.

00507/1/007 Roderick McDougall - Wishes to see the policy safeguard land required for potential new rail passenger access points (stations) including (but not exclusively) Jordanhill West.

00177/3/010 Anthony Lennon - Wishes to see the reinstatement of the City Plan 2 rail proposal for a station at Jordanhill West.

00556/1/009 Ken Sutherland - Wishes to see the policy safeguard land required for pursuing the opportunity for additional new station at Jordanhill West. Even with the relocation of Jordanhill College of Education, there is a large catchment area of significant travel demand (and potential modal shift opportunity) located far outwith the convenient reach of existing Jordanhill Station. A household survey including Scotstoun Leisure Centre should be undertaken to assess potential demand.

00507/1/012 Roderick McDougall - Wishes to see the policy safeguard land required for potential new rail passenger access points (stations) including (but not exclusively) Parkhead.

00177/3/008 Anthony Lennon - Support the station proposed at Parkhead Forge for the usual reasons - new housing developments, travel/employment/educational opportunities, encouragement to use public transport etc. Parkhead Forge has tremendous potential with regard to the adjacent retail developments, Celtic Park traffic and the newly constructed Commonwealth Games sports facilities.

00556/1/004 Ken Sutherland - The land area required for a new rail station at Parkhead should be safeguarded regardless of the fact that a STAG evaluation has not yet been undertaken.

00621/8/004 Scottish Government - Bullet Point 4 of policy CDP 11 should be reworded to remove reference to land being safeguarded for a rail station at Parkhead which has not resulted from an appropriate appraisal and has no current status in terms of funding or delivery and Figure 19 should be revised accordingly.

00507/1/010 Roderick McDougall - Wishes to see the policy safeguard land required for potential new rail passenger access points (stations) including (but not exclusively) Broomfield Road.

00507/1/004 Roderick McDougall - Wishes to see the policy safeguard land required for potential new rail passenger access points (stations) including (but not exclusively) Drumchapel West.

00177/3/011 Anthony Lennon) - Support the station proposed at Drumchapel West for the usual reasons - new housing developments, travel/employment/educational opportunities, encouragement to use public transport etc.

00556/1/005 Ken Sutherland - The land area required for a new rail station at Drumchapel West should be safeguarded regardless of the fact that a STAG evaluation has not yet been undertaken.

00621/8/001 Scottish Government - Bullet Point 4 of Policy CDP 11 Sustainable Transport should be reworded to remove reference to land being safeguarded for a rail station at Drumchapel West which has not resulted from an appropriate appraisal and has no current status in terms of funding or delivery. Figure 19 should also be revised accordingly.

00177/3/009 Anthony Lennon - Wishes to see the reinstatement of the City Plan 2 rail proposals for a station at Ibrox. The Ibrox proposal seems to have obvious great potential for football traffic.

00556/1/008 Ken Sutherland - Wishes to see the policy safeguard land required for pursuing the opportunity for additional new station at Ibrox. Do not agree that a station here would be 'almost certainly too close to the city centre'. It would have a catchment area population of 3,500 and a service link via Crossrail would potentially offer improved accessibility, delivering travel benefits for Ibrox Stadium.

00507/1/016 Roderick McDougall - Wishes to see the policy safeguard land required for potential new rail passenger access points (stations) including (but not exclusively) Ibrox.

00507/1/008 Roderick McDougall - Wishes to see the policy safeguard land required for potential new rail passenger access points (stations) including (but not exclusively) Finnieston North (Yorkhill).

00507/1/009 Roderick McDougall - Wishes to see the policy safeguard land required for potential new rail passenger access points (stations) including (but not exclusively) Partick Central (terminal station for some Crossrail trains).

00623/1/001 Yorkhill and Kelvingrove Community Council - Seeks amendment of Policy CDP 11 to safeguard land for the reinstatement of the former Finnieston Station on the line between Charing Cross and Partick, where it passes under Argyle Street. Public transport options in the area are not, otherwise, good. The remaining access point to the former station site should be safeguarded in The Plan.

00507/1/013 Roderick McDougall - Wishes to see the policy safeguard land required for potential new rail passenger access points (stations) including (but not exclusively) Ellismuir Farm.

00507/1/015 Roderick McDougall - Wishes to see the policy safeguard land required for potential new rail passenger access points (stations) including (but not exclusively) Glasgow Green.

#### Supporting

00415/1/006 Ron McLean - Wishes to see the rail proposal for the reopening of Robroyston Station in City Plan 3. Robroyston Station could be used as park and ride linked to the M90.

00420/1/004 Patricia Ferguson MSP - Wishes to see a rail station at Robroyston, but believes this proposal is less effective without the Garngad Chord.

00507/1/006 Roderick McDougall - Supports the policy safeguard of land required for new rail passenger access point (station) at Robroyston.

00177/3/007 Anthony Lennon - Strongly support the station proposed at Robroyston for reasons such as new housing developments, travel/employment/educational opportunities, encouragement to use public transport etc.

00556/1/003 Ken Sutherland - Welcomes the safeguarding of land required for Robroyston station.

#### Other Rail

#### Objecting

00610/2/001 Glasgow Harbour Ltd - Objects to a section of former rail formation at Curle Street/Ferryden Street in Whiteinch, being designated as a safeguarded rail formation. The site at present is disused, overgrown scrub land and does little to enhance the local area. In this regard the site does not merit protection as open space or railway formation. The site should be identified as a residential development opportunity site under Policy CDP10 'Meeting Housing Needs' in The Plan.

00479/6/001 Hillhead Community Council - Supports the policy but wishes to see the policy safeguard all existing and former rail routes, without exception. Mistakes have been made in the past: e.g. Building on part of the Botanics line would subsequently have been used to service Maryhill and connect to the city and other routes. These routes cannot be replaced and future use is as yet unknown, but may become essential. These routes could be an essential part of policy to reduce car use.

(00669/1/006 Transform Scotland) - Have significant concerns that two of the safeguarded former rail routes are planned to be converted into 'relief roads: if such roads are to offer relief from through and heavy traffic in residential areas, plans must be in place to 'lock in' the diversion of traffic rather than simply provide an increase in capacity.

#### **Modifications sought by those submitting representations:**

#### Crossrail

00006/1/001 ROCK DCM - Wishes to see the Crossrail project included in The Plan, including the continued safeguarding of the High Street Curve component and the creation of Glasgow Cross Station.

00415/1/003 Ron McLean, 00446/1/003 The Untouchables (Scotland) Ltd, 00556/1/001 Ken Sutherland - The Plan should safeguard land for Crossrail.

00420/1/002 Patricia Ferguson MSP - The Plan should safeguard land for Crossrail including a station at Glasgow Cross.

00067/1/001 Glasgow Barrowland - Wishes to see the Crossrail project, including an interchange with the Argyle line at a Glasgow Cross Station, included in The Plan.

00177/3/005 Anthony Lennon - The Plan should safeguard land for Crossrail and the stations proposed on the Crossrail route.

00609/3/002 Pollokshields Community Council - Make greater reference to the benefits of Crossrail in the Policy section.

### High Street Curve

00177/3/001 Anthony Lennon, 00415/1/008 Ron McLean, 00428/1/001 Alastair Ewen, 00446/1/001 The Untouchables (Scotland) Ltd, 00479/7/002 Hillhead Community Council, 00507/1/002 Roderick McDougall, 00556/1/006 Ken Sutherland, 00609/3/005 Pollokshields Community Council, 00641/1/001 Andrew Heatlie - The Plan should safeguard land for the High Street Curve.

00507/1/014 Roderick McDougall - The Plan should safeguard land for the relocation of High Street Station westwards to accommodate the High Street Curve.

### Other Crossrail Stations and Routes

00415/1/004 Ron McLean - The Plan should safeguard land for the Strathbungo Link.  
00415/1/005 Ron McLean - The Plan should safeguard land for the Kelvinhaugh Turnback.

00507/1/017 Roderick McDougall - The Plan should safeguard land for new stations at Glasgow Cross (interchange with the Argyle Line); Citizens (Gorbals); and West Street (interchange with the Underground).

00507/1/003 Roderick McDougall - The Plan should safeguard land for the Muirhouse Link.

00621/8/003 Scottish Government - Policy CDP 11, Bullet Point 6, should be reworded to remove reference to stations at Glasgow Cross, West Street and Gorbals and Figure 19 should be revised accordingly.

00479/7/001 Hillhead Community Council - The Plan should safeguard the City Union Line.

### Garngad Chord

00177/3/006 Anthony Lennon, 00415/1/001 Ron McLean, 00420/1/003 Patricia Ferguson MSP, 00479/7/003 Hillhead Community Council, 00507/1/001 Roderick McDougall, 00556/1/002 Ken Sutherland, 00641/1/002 Andrew Heatlie - The Plan should safeguard land for the Garngad Chord.

### Glasgow Airport Access

00177/3/004 Anthony Lennon, 00415/1/002 Ron McLean, 00428/1/002 Alastair Ewen, 00446/1/002 The Untouchables (Scotland) Ltd - The Plan should safeguard land for a Heavy Rail Link to Glasgow Airport.

00420/1/00 Patricia Ferguson MSP - The Plan should safeguard land for a rail link to Glasgow Airport.

00556/1/010 Ken Sutherland - The Plan should state a commitment to secure a Heavy Rail Link to Glasgow Airport.

00633/18/004 Strathclyde Partnership for Transport - Context of Policy CDP11 should be reworded to include reference to the outcomes of the Glasgow Airport Strategic Transport

Study.

### High Speed Rail

00177/3/00 Anthony Lennon - The Plan should safeguard land for feasible potential sites for a High Speed Rail Terminal.

00556/1/011 Ken Sutherland - The Plan should safeguard land for potential sites for a High Speed Rail Terminal.

00621/8/002 Scottish Government - Policy CDP 11, Bullet Point 5, should be reworded to remove reference to the safeguarding of land for a potential High Speed Rail station.

### Rail Stations

00177/3/002 Anthony Lennon, 00420/1/001 Patricia Ferguson MSP, 00556/1/007 Ken Sutherland - The Plan should safeguard land for a station at Blochairn/Garngad.

00507/1/011 Roderick McDougall - The City Development Plan should safeguard land for a station at Blochairn.

00177/3/010 Anthony Lennon, 00507/1/007 Roderick McDougall, 00556/1/009 Ken Sutherland - The City Development Plan should safeguard land for a station at Jordanhill West.

00177/3/008 Anthony Lennon, 00507/1/012 Roderick McDougall, 00556/1/004 Ken Sutherland - The City Development Plan should safeguard land for a station at Parkhead.

00621/8/004 Scottish Government - Policy CDP11, Bullet Point 4, should be reworded to remove reference to land being safeguarded for a rail station at Parkhead. Figure 19 should also be revised accordingly.

00507/1/010 Roderick McDougall - The City Development Plan should safeguard land for a station at Broomfield Road.

00177/3/011 Anthony Lennon, 00507/1/004 Roderick McDougall, 00556/1/005 Ken Sutherland - The City Development Plan should safeguard land for a station at Drumchapel West.

00621/8/001 Scottish Government - Policy CDP 11, Bullet Point 4, should be reworded to remove reference to land being safeguarded for a rail station at Drumchapel West. Figure 19 should also be revised accordingly.

00177/3/009 Anthony Lennon, 00507/1/016 Roderick McDougall, 00556/1/008 Ken Sutherland - The City Development Plan should safeguard land for a station at Ibrox.

00507/1/008 Roderick McDougall - The City Development Plan should safeguard land for a station at Finnieston North (Yorkhill).

00507/1/009 Roderick McDougall - The City Development Plan should safeguard land for a station at Partick Central (terminal station for some Crossrail trains).



00623/1/001 Yorkhill and Kelvingrove Community Council - Policy CDP 11 should be reworded to safeguard land for the reinstatement of the former Finnieston Station.

00507/1/013 Roderick McDougall - The City Development Plan should safeguard land for a station at Ellismuir Farm.

00507/1/015 Roderick McDougall - The City Development Plan should safeguard land for a station at Glasgow Green.

#### Other Rail

00610/2/001 Glasgow Harbour Ltd - The Policy and Proposals Map should be amended to no longer identify the former rail formation at Curle Street/Ferryden Street as a safeguarded former rail formation. The site should be identified as a housing site on the Policy and Proposals Map.

00479/6/001 Hillhead Community Council - Policy CDP5 should be reworded to state that all existing and former rail routes, without exception, should be safeguarded.

00669/1/006 Transform Scotland - The City Development Plan should illustrate how the development of relief roads will lock in the diversion of traffic rather than simply provide an increase in capacity.

#### **Summary of responses (including reasons) by planning authority:**

##### Crossrail

##### Objecting

00006/1/001 ROCK DCM, 00067/1/001 Glasgow Barrowland, 00177/3/005 Anthony Lennon, 00415/1/003 Ron McLean, 00420/1/002 Patricia Ferguson MSP, 00446/1/003 The Untouchables (Scotland) Ltd, 00556/1/001 Ken Sutherland, 00609/3/002 Pollokshields Community Council - The development of a Crossrail scheme, intended to link the suburban rail networks north and south of the Clyde, has been a long-standing ambition of development plans in the Glasgow area, from the Strathclyde Structure Plan to City Plan 2 (CE17, policy TRANS 1).

Under the Planning etc. (Scotland) Act 2006 (CE16), an Action Programme requires to be prepared, setting out the delivery details of each of the proposals contained in the Plan. During engagement with the Key Agencies, prior to producing the Main Issues Report, Transport Scotland had intimated that the Strategic Transport Projects Review (STPR) (OC94, Appendix E, E3 (page 302) and Annex 3, E3 (pages 587-591)) considered Crossrail and concluded that it would not make best use of the rail network or integrate well with the schemes required to satisfy the objectives of the STPR. In the absence of support for, or a funding commitment to, Crossrail, the Main Issues Report had continued to safeguard land required for its implementation as an 'aspiration' rather than a firm proposal, providing for its development at a future date, should the funding position, and other considerations, allow.

Subsequent meetings with the key agencies indicated that the safeguarding of 'aspirational' proposals, with no commitment to their delivery, was unlikely to be acceptable. In addition, Transport Scotland's response to the MIR (OC33, Annex B) reiterated the fact the STPR had rejected Crossrail and that:

- as a stand-alone intervention it would not achieve the step change necessary to deliver significant improvements for Glasgow and the west of Scotland;
- committed improvements on the rail network between Edinburgh and Glasgow were likely to provide much of the potential benefit that Glasgow Crossrail sought to provide, but without disrupting other flows and at a fraction of the cost; and
- the case for Crossrail does not take account of trade-offs such as the disadvantage caused to many passengers by diverting existing services from city centre stations to run via Crossrail.

The response concluded by saying that the Scottish Government had no plans to approve or fund the delivery of Glasgow Crossrail, although there were no plans to close the route or remove the railway infrastructure.

As a result of this position, the Proposed Plan indicates that, whilst the Council had previously supported the development of a Crossrail scheme, this was no longer being pursued. However, the key elements: the City Union line and the Strathbungo link continue to be safeguarded as an existing rail line and former rail formation respectively.

Whilst the Council is still keen to promote passenger services on the City Union line as a means of delivering strategic, cross Glasgow connectivity by rail, Transport Scotland's stance on this matter, and the lack of a commitment to deliver services or funding, means that it not possible to commit to the delivery of Crossrail in the Plan.

(The "Other Crossrail Stations and Routes" sub-Issue deals with associated stations, including Glasgow Cross Station, the Strathbungo Link and Kelvinhaugh Turnback.)

No modifications recommended.

### High Street Curve

#### Objecting

00177/3/001 Anthony Lennon, 00415/1/008 Ron McLean, 00428/1/001 Alastair Ewen, 00446/1/001 The Untouchables (Scotland) Ltd, 00479/7/002 Hillhead Community Council, 00507/1/002, 00507/1/014 Roderick McDougall, 00556/1/006 Ken Sutherland, 00609/3/005 Pollokshields Community Council, 00641/1/001 Andrew Heatlie - The development of a Crossrail scheme, intended to link the suburban rail networks north and south of the Clyde, has been a long-standing ambition of development plans in the Glasgow area, from the Strathclyde Structure Plan to City Plan 2 (CE17, policy TRANS 1).

Under the Planning etc. (Scotland) Act 2006 (CE16), an Action Programme requires to be prepared, setting out the delivery details of each of the proposals contained in the Plan. During engagement with the Key Agencies, prior to producing the Main Issues Report, Transport Scotland had intimated that the Strategic Transport Projects Review (STPR) (OC94, Appendix E, E3 (page 302) and Annex 3, E3 (pages 587-591)) considered Crossrail and concluded that it would not make best use of the rail network or integrate well with the schemes required to satisfy the objectives of the STPR. In the absence of support for, or a funding commitment to, Crossrail, the Main Issues Report had continued to safeguard land required for its implementation as an 'aspiration' rather than a firm proposal, providing for its development at a future date, should the funding position, and other considerations, allow.

Subsequent meetings with the key agencies indicated that the safeguarding of 'aspirational' proposals, with no commitment to their delivery, was unlikely to be acceptable. In addition, Transport Scotland's response to the MIR (OC33, Annex B) reiterated the fact the STPR had rejected Crossrail and that:

- as a stand-alone intervention it would not achieve the step change necessary to deliver significant improvements for Glasgow and the west of Scotland;
- committed improvements on the rail network between Edinburgh and Glasgow were likely to provide much of the potential benefit that Glasgow Crossrail sought to provide, but without disrupting other flows and at a fraction of the cost; and
- the case for Crossrail does not take account of trade-offs such as the disadvantage caused to many passengers by diverting existing services from city centre stations to run via Crossrail.

The response concluded by saying that the Scottish Government had no plans to approve or fund the delivery of Glasgow Crossrail, although there were no plans to close the route or remove the railway infrastructure.

As a result of this position, the Proposed Plan indicates that, whilst the Council had previously supported the development of a Crossrail scheme, this was no longer being pursued. However, the key elements: the City Union line and the Strathbungo link continue to be safeguarded as an existing rail line and former rail formation respectively.

Whilst the Council is still keen to promote passenger services on the City Union line as a means of delivering strategic, cross Glasgow connectivity by rail, Transport Scotland's stance on this matter, and the lack of a commitment to deliver services on funding, means that it not possible to commit to the delivery of Crossrail in the Plan.

The High Street Curve (OC95) was intended to link the City Union Line to the Queen Street Low Level line, providing for services between the southern suburban services and Charing Cross station. Even with passenger use of the City Union line, it is likely to provide for local service enhancements only, as line capacity restrictions mean that services could not travel any further than Charing Cross without disrupting other services. The High Street Curve cannot be safeguarded as a former rail formation as there has never been a rail formation on this alignment. Moreover, in the absence of a Crossrail link, as previously supported, there would no longer be value in reserving this alignment. In conjunction with this, and in the absence of a commitment to deliver new services on the City Union line, it is considered that its safeguarding for transport purposes can no longer be justified.

As a result, there is also no justification in safeguarding land for a former proposal to move High Street Station westwards to accommodate the Curve.

(The "Other Crossrail Stations and Routes" sub-Issue deals with Glasgow Cross Station.)

No modifications recommended.

#### Other Crossrail Stations and Routes

#### Objecting

00415/1/004 Ron McLean - City Plan 2 envisaged the use of the Strathbungo Link as part of the Crossrail proposal (CE17). The Strathbungo Link (OC95) is an existing former rail

formation, and it would have enabled access to the City Union line for south-side passenger services from, e.g., the Cathcart Circle. Transport Scotland's stance on the Crossrail Scheme (see *Crossrail* sub-issue above) means that Crossrail is no longer included as a proposal in the Plan. In the absence of passenger services on the City Union Line, there are no grounds for including the Strathbungo Link as a proposal in the Plan. However, in line with SPP (CE2, paragraph 277), the Plan does safeguard the existing rail formation as a former rail formation with potential for re-use for public transport, and the route has been safeguarded through recent developments in the vicinity, including the M74 and First Bus Depot.

No modifications recommended.

00415/1/005 Ron McLean - City Plan 2 envisaged the use of the Kelvinhaugh Turnback as part of the Crossrail proposal (CE17). It would be a new piece of rail infrastructure which would have allowed trains from the east, including those utilising the High Street Curve, to turn into a siding (OC95) and return eastwards to avoid running onto the congested track to the west of the junction of the Argyle and Queen Street Low Level lines. This would have been a necessary piece of infrastructure should the former scheme for Crossrail, including the High Street Curve, have proceeded. However, Transport Scotland's stance on the former Crossrail Scheme (see *Crossrail* sub-issue above), including the High Street Curve, means that it is no longer included as proposal in the Plan. As such, the case for the Kelvinhaugh Turnback is considerably weakened.

Whilst there may be longer term benefits in retaining land for the Kelvinhaugh Turnback (including allowing trains on the Queen St line to stop short of Partick, freeing up capacity for other services), given Transport Scotland's stance on Crossrail, there are considerable uncertainties over its implementation. As a result, it is not identified as a proposal. However, its location on operational rail land does afford it protection which should provide for its future delivery, should this be desirable.

No modifications recommended.

00507/1/017 Roderick McDougall, 00621/8/003 Scottish Government - The development of a Crossrail scheme, intended to link the suburban rail networks north and south of the Clyde, has been a long-standing ambition of development plans in the Glasgow area, from the Strathclyde Structure Plan to City Plan 2 (CE17).

Under the Planning etc. (Scotland) Act 2006 (CE16), an Action Programme requires to be prepared, setting out the delivery details of each of the proposals contained in the Plan. During engagement with the Key Agencies, prior to producing the Main Issues Report, Transport Scotland had intimated that the Strategic Transport Projects Review (STPR) (OC94, Appendix E, E3 (page 302) and Annex 3, E3 (pages 587-591)) considered Crossrail and concluded that it would not make best use of the rail network or integrate well with the menu of schemes required to satisfy the objectives of the STPR. In the absence of support for, or a funding commitment to, Crossrail, the Main Issues Report had continued to safeguard land required for its implementation as an 'aspiration' rather than a firm proposal, providing for its development at a future date, should the funding position, and other considerations, allow.

Subsequent meetings with the key agencies indicated that the safeguarding of 'aspirational' proposals, with no commitment to their delivery, was unlikely to be acceptable. In addition, Transport Scotland's response to the MIR (OC33, Annex B)

reiterated the fact the STPR and rejected Crossrail and that:

- as a stand-alone intervention it would not achieve the step change necessary to deliver significant improvements for Glasgow and the west of Scotland;
- committed improvements on the rail network between Edinburgh and Glasgow were likely to provide much of the potential benefit that Glasgow Crossrail sought to provide, but without disrupting other flows and at a fraction of the cost; and
- the case for Crossrail does not take account of trade-offs such as the disadvantage caused to many passengers by diverting existing services from city centre stations to run via Crossrail.

The response concluded by saying that the Scottish Government had no plans to approve or fund the delivery of Glasgow Crossrail, although there were no plans to close the route or remove the railway infrastructure.

As a result of this position, the Proposed Plan indicates that, whilst the Council had previously supported the development of a Crossrail scheme, this was no longer being pursued. However, the key elements: the City Union line and the Strathbungo link continue to be safeguarded as an existing rail line and former rail formation respectively. The Council is still keen to promote passenger services on the City Union line as a means of delivering strategic, cross-Glasgow connectivity by rail. In the event that passenger services run on the route in the future, policy CDP11 safeguards land for stations, at West Street and Glasgow Cross, which would help make best use of these services by providing for strategic interchange possibilities (with the Argyle Line at Glasgow Cross and with the Subway at west street). There are no blight implications associated with the safeguarding of the land for either of these stations as the land in question is either owned by the Council or is on operational rail land. A station proposed at Gorbals (proposed in City Plan 2 (CE17, policy TRANS 1)) offers no strategic interchange opportunities, and is not identified in the Plan, but would also be safeguarded as the land required is currently operational rail land.

Transport Scotland's objection indicates that these interventions should not be included within the Plan until appropriate appraisal is complete and, given the lack of any progress relating to supporting appraisal, reference to the stations should be removed from the Plan. In this respect, the context to Policy CDP11 recognises that a positive appraisal of the impact of passenger services on the line, and of associated stations, would be required before any scheme could be delivered. As a result, and given the absence of any potential blight in this instance, it is considered that the Plan should continue to safeguard land for stations at West Street and Glasgow Cross

No modifications recommended.

00507/1/003 Roderick McDougall - The Muirhouse Link was a proposal to develop a new rail line which would connect services on south-side rail lines with the rail services on the Argyle and Queen Street lines, via the City Union line. In that respect, it was an alternative to the use of the Strathbungo link.

Strathclyde Partnership for Transport procured a STAG Part 2 appraisal on Glasgow Crossrail, which looked at the various options. A STAG Part 1 appraisal and technical assessment was undertaken by Scott Wilson in 2005. This confirmed the continuing technical feasibility of the project and appraised a wide range of options for its specification. The Final STAG Part 2 report was undertaken by Faber Maunsell and published in March 2008 (OC37, page 3). It identified an outline core proposal which

utilised only:

- the City Union line
- Strathbungo link
- Kelvinhaugh turnback
- St John's (High Street) Chord; and
- three new stations at West Street/Gorbals/Glasgow Cross.

The Muirhouse Link was not taken through to the STAG Part 2 Report –understood to be because the Strathbungo Link was considered to provide greater benefits. As a result, the Muirhouse Link was not included in City Plan 2. Moreover, the Scottish Government has made it clear that it has no plans to approve or fund the delivery of Glasgow Crossrail.

No modifications recommended.

00479/7/001 Hillhead Community Council - Whilst the Scottish Government has no plans to approve or fund the delivery of Glasgow Crossrail, the key elements of the scheme, principally the City Union line, continue to be safeguarded by the Plan. The City Union line is a live rail line and should it fall out of use, it would be safeguarded, in line with SPP (CE2, paragraph 277), as a disused railway line with a reasonable prospect of being reused for public transport.

However, its use for light rapid transport is something that would require very careful consideration. The line is currently used for freight movement, and this function is likely to continue. The existing track would, in principal, provide for heavy rail passenger services, however, light rail and freight transport could pose considerable problems.

No modifications recommended.

#### Supporting

00609/3/003 Pollokshields Community Council – Noted.

No modifications recommended.

#### Garngad Chord

#### Objecting

00177/3/006 Anthony Lennon, 00415/1/001 Ron McLean, 00420/1/003 Patricia Ferguson MSP, 00479/7/003 Hillhead Community Council, 00507/1/001 Roderick McDougall, 00556/1/002 Ken Sutherland, 00641/1/002 Andrew Heatlie - The Council has long considered the Garngad Chord as a key piece of infrastructure which might help facilitate cross-Scotland journeys, particularly as part of a wider Crossrail scheme, and it was one of a number of options being considered for the Edinburgh to Glasgow Improvements Programme (EGIP). However, Transport Scotland's views on the MIR (OC33, Annex B) indicated that the EGIP outputs could be delivered more efficiently without the requirement for the Garngad Chord and that it had been removed from the EGIP programme scope (OC45, Background Paper 11, paras 5.28-5.30 refers). Whilst Transport Scotland would welcome the safeguarding of land for the Garngad Chord in the Plan, there would be difficulties in doing so. The Council does not own the land, there has been interest in securing a residential development on the site and it is not a former

rail line (which would permit safeguarding through SPP (CE2, paragraph 277). An initial estimate has been made of the cost of delivering the Chord and, as a result of the difference in height between the railways it is intended to join, the costs were likely to be considerable.

The Plan cannot safeguard land for the Garngad Chord without some commitment to its delivery being included in the Action Programme. However, in recognition of its potential importance, the Plan indicates that the Council will continue to investigate options for securing its transport potential.

Regarding objection 00479/7/003, the value of the Chord has always been considered to be the strategic benefits it could provide in the form of cross-Scotland journeys by heavy rail. It is unlikely that use of the link for light rapid transit would deliver such strategic benefits. Regardless, however, the obstacles to safeguarding it would be the same, including the lack of commitment to its delivery and consideration of the implications for heavy rail services.

No modifications recommended.

### Glasgow Airport Access

#### Objecting

00177/3/004 Anthony Lennon, 00415/1/002 Ron McLean, 00420/1/005 Patricia Ferguson MSP, 00428/1/002 Alastair Ewen, 00446/1/002 The Untouchables (Scotland) Ltd, 00556/1/010 Ken Sutherland - The City Deal agreed by the Glasgow and Clyde Valley local authorities will deliver a rail link between the City Centre and Glasgow Airport (CE7, Table 2, page 12). At present, it is not clear what form that link will take, but various options, including a heavy rail link and a Tram/Train link (to run on existing rail lines) were considered in the recent Glasgow Airport Strategic Transport Appraisal study (OC35).

A rail link should help deliver a more sustainable mode share in relation to airport trips, and is to be welcomed. However, in relation to safeguarding land for such a link, and regardless of whether it was a heavy rail scheme or tram/train, the link will use existing infrastructure in Glasgow. This will be in the form of the third rail track to Paisley and additional platform provision at Glasgow Central, both constructed to support the previous Glasgow Airport Rail Link proposal. As the new link will have no physical land take implications in the City, the Plan cannot safeguard land for it. This would be the case irrespective of whichever scheme was pursued – these would include variations to the original scheme only in the Renfrewshire Council area.

No modifications recommended – however see response to objection 00633/18/004.

00633/18/004 Strathclyde Partnership for Transport - The City Deal agreed by the Glasgow and Clyde Valley local authorities will deliver a rail link between the City Centre and Glasgow Airport (CE7, Table 2). At present, it is not clear what form that link will take, but various options, including a heavy rail link and a Tram/Train link (to run on existing rail lines) were considered in the recent Glasgow Airport Strategic Transport Appraisal study.

Whilst the proposed link will have no physical land take implications in the City, and it is

not possible to safeguard land for it, it is recognised that there may be merit in mentioning the outcomes of the Glasgow Airport Strategic Transport Study in the context to the Policy.

The Reporter could, if so minded, amend the context to Policy CDP11 by inserting new text, at end of second paragraph of context, to read: 'The Glasgow Airport Strategic Transport Appraisal study considered options for delivering a new public transport link to Glasgow Airport. The City Deal agreed by the Glasgow and Clyde Valley local authorities will deliver a new rail link to Glasgow Airport, however the link will have no physical land take implications for Glasgow.' This would be a purely factual amendment to the context to the policy and would have no implications for the LDP strategy or other policies within the Plan.

### High Speed Rail

#### Objecting

00177/3/003 Anthony Lennon, 00556/1/011 Ken Sutherland, 00621/8/002 Scottish Government - NPF2 identified High Speed Rail as a national development, describing it as 'high-speed rail lines linking Edinburgh and Glasgow city centres with London and offering good connections to the rest of the rail network' (CE21, page 108). The Proposed SDP 2012 reflected this, requiring 'Glasgow City Council and related stakeholders to take early action to identify a location in central Glasgow for a High Speed Rail terminus'. As a result, the LDP Main Issues Report identified three potential locations for a high speed rail terminus in central Glasgow. Post publication of the MIR, Scottish Ministers approved the SDP with modifications. These included modification of the text in relation to High Speed Rail, to reflect the fact that a Scottish Partnership Group had been established to identify a location in central Glasgow for a high speed rail terminus and that, following identification, the Council were to secure and safeguard land for a terminal. Background Paper 11 (OC45, paragraphs 5.15 – 5.18) provides further detail.

The Partnership Group has not yet reported back on a preferred location and the Council is concerned at this continuing lack of direction. In particular, there are concerns that the lack of strong direction on a suitable site could mean that the two key options in Central Glasgow (east of High Street and at Central Station) may be compromised by development which could undermine their delivery. As such, policy CDP 11 identifies sites at High Street and Central Station as potential locations for a High Speed Rail terminus, and indicates that development proposals which impact on the deliverability of a terminus at either site would require to be considered in terms of their impact. Once a preferred option has been identified, then only the land for that site, and associated connections, would be safeguarded by the policy. Should the Partnership Group identify a preferred site in the near future, then this approach would minimise potential blight. To do otherwise could mean that the Council won't be in a position to comply with the SDP in securing land for the chosen site.

No modifications recommended.

### Rail Stations

#### Objecting



00177/3/002 Anthony Lennon, 00420/1/001 Patricia Ferguson MSP, 00507/1/011 Roderick McDougall, 00556/1/007 Ken Sutherland - Under the Planning etc. (Scotland) Act 2006 (*CE16*), an Action Programme requires to be prepared, setting out the delivery details of each of the proposals contained in the Plan. In the absence of a funding commitment for a station at Blochairn/Garngad, the Main Issues Report (*CE8*, Issue 4.3) had proposed that certain rail schemes and stations could be identified as 'aspirations' rather than firm proposals, providing for their development at a future date, should the funding position, and other considerations, allow. Subsequent meetings with the key agencies indicated that the safeguarding of 'aspirational' proposals, with no commitment to their delivery, was unlikely to be acceptable.

Transport Scotland's response to the MIR (OC33, Annex B) indicated that the proposed station location at Blochairn/Garngad was too close to the city centre to offer attractive rail journey times; that the use of existing stations on the line was very poor; and that, even with amalgamation or closure of other stations in the vicinity, the economic case would be poor. As a result, they concluded that there were no plans to provide this station.

SPP states that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance (*CE2*, paragraph 277). In the absence of such an appraisal or commitment to delivery, it is considered that Blochairn/Garngad cannot be included as a proposed rail station in the LDP.

No modifications recommended.

00177/3/010 Anthony Lennon, 00507/1/007 Roderick McDougall, 00556/1/009 Ken Sutherland - Under the Planning etc. (Scotland) Act 2006 (*CE16*), an Action Programme requires to be prepared, setting out the delivery details of each of the proposals contained in the Plan. In the absence of a funding commitment for a station at Jordanhill (West), the Main Issues Report (*CE8*, Issue 4.3) had proposed that certain rail schemes and stations could be identified as 'aspirations' rather than firm proposals, providing for their development at a future date, should the funding position, and other considerations, allow. Subsequent meetings with the key agencies indicated that the safeguarding of 'aspirational' proposals, with no commitment to their delivery, was unlikely to be acceptable.

In response to the MIR (OC33, Annex B), Transport Scotland had indicated that a station relocation would not have a significant strategic impact, but that it would be for the promoter/developer to fund the provision of the new station and demolition of the existing one, suggesting that the Jordanhill station proposal would only work as a relocation of the existing Jordanhill station. A new station had, principally, been proposed to support the teacher training college, which has now relocated. It is also considered that the existing station serves an area of greater residential density.

SPP states that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance (*CE2*, paragraph 277). In the absence of such an appraisal or commitment to delivery, it is considered that the LDP should not include a proposal to relocate the station.

No modifications recommended.

00507/1/008 Roderick McDougall - This is a proposal that was not included in the Main Issues Report in any form and has not, therefore, been subject to consultation with the public or with the Key Agencies. It is not included as a proposal in City Plan 2 and the objector has not provided any evidence to support its inclusion as a proposal in the Plan.

SPP states that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance (CE2, paragraph 277). In the absence of such an appraisal or commitment to delivery, it is considered that the LDP should not include a rail station at Finnieston North (Yorkhill) as a proposal.

No modifications recommended.

00507/1/009 Roderick McDougall - This is a proposal that was not included in the Main Issues Report in any form and has not, therefore, been subject to consultation with the public or with the Key Agencies. It is not included as a proposal in City Plan 2 and the objector has not provided any evidence to support its inclusion as a proposal in the Plan, including its precise location. However, it should be noted that the former Partick Central Station, closed in the 1960s, is no longer on a live rail line.

SPP states that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance (CE2, paragraph 277). In the absence of such an appraisal or commitment to delivery, it is considered that the LDP should not include a rail station at Partick Central as a proposal.

No modifications recommended.

00177/3/008 Anthony Lennon, 00507/1/012 Roderick McDougall, 00556/1/004 Ken Sutherland, 00621/8/004 Scottish Government - Under the Planning etc. (Scotland) Act 2006 (CE16), an Action Programme requires to be prepared, setting out the delivery details of each of the proposals contained in the Plan. In the absence of a funding commitment for a station at Parkhead Forge, the Main Issues Report (CE8, Issue 4.3) had proposed that certain rail schemes and stations could be identified as 'aspirations' rather than firm proposals, providing for their development at a future date, should the funding position, and other considerations, allow. Subsequent meetings with the key agencies indicated that the safeguarding of 'aspirational' proposals, with no commitment to their delivery, was unlikely to be acceptable.

In response to the MIR (OC33, Annex A), Transport Scotland had indicated that, in principle, a railway station at this location appeared worthy of assessment, as there was likely to be a passenger demand arising from the retail activities. However, resource constraints have meant that, to date, no assessment has been undertaken. Transport Scotland's representation on the Proposed Plan seeks rewording of bullet point four of policy CDP 11 to remove reference to land being safeguarded for a rail station at Parkhead as this has not resulted from an appropriate appraisal and has no current status in terms of funding or delivery. It also suggests that the wording gives the impression that these schemes are to a certain extent committed, thus providing misleading information within the Plan.

SPP states that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance

(CE2, paragraph 277). CPD 11 indicates that land for this station will be safeguarded where it has been brought forward through study and where it has been justified by a STAG appraisal. This is not considered misleading. As a result, it is shown as a potential rail station, and not a proposed rail station, on Figure 19. It is considered that this reflects the spirit of Transport Scotland's representation.

If necessary, Supplementary Guidance will be brought forward in due course to identify any land which requires to be safeguarded.

No modifications recommended.

00507/1/013, 00507/1/015 Roderick McDougall - These are proposals that were not included in the Main Issues Report in any form and have not, therefore, been subject to consultation with the public or with the Key Agencies. They are not included as proposals in City Plan 2 and the objectors have not provided any evidence to support their inclusion as proposals in the Plan.

SPP states that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance (CE2, paragraph 277). In the absence of such an appraisal or commitment to delivery, it is considered that the LDP should not include Ellismuir Farm or Glasgow Green as proposals for rail stations.

No modifications recommended.

00507/1/010 Roderick McDougall - Under the Planning etc. (Scotland) Act 2006 (CE16), an Action Programme requires to be prepared, setting out the delivery details of each of the proposals contained in the Plan. In the absence of a funding commitment for a station at Broomfield Road (described as Germiston in the MIR), the Main Issues Report (CE8, Issue 4.3) had proposed that certain rail schemes and stations could be identified as 'aspirations' rather than firm proposals, providing for their development at a future date, should the funding position, and other considerations, allow. Subsequent meetings with the key agencies indicated that the safeguarding of 'aspirational' proposals, with no commitment to their delivery, was unlikely to be acceptable.

Transport Scotland's response to the MIR (OC33, Annex B) indicated that the proposed station location at Germiston was too close to the city centre to offer attractive rail journey times; that the use of existing stations on the line was very poor; and that, even with amalgamation or closure of other stations in the vicinity, the economic case would be poor. As a result, they concluded that there were no plans to provide this station.

SPP states that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance (CE2, paragraph 277). In the absence of such an appraisal or commitment to delivery, it is considered that Broomfield Road cannot be included as a proposed rail station in the LDP.

No modifications recommended.

00177/3/011 Anthony Lennon, 00507/1/004 Roderick McDougall, 00556/1/005 Ken Sutherland, 00621/8/001 Scottish Government - Under the Planning etc. (Scotland) Act 2006 (CE16), an Action Programme requires to be prepared, setting out the delivery details of each of the proposals contained in the Plan. In the absence of a funding

commitment for a station at Drumchapel (West), the Main Issues Report (CE8, Issue 4.3) had proposed that certain rail schemes and stations could be identified as 'aspirations' rather than firm proposals, providing for their development at a future date, should the funding position, and other considerations, allow. Subsequent meetings with the key agencies indicated that the safeguarding of 'aspirational' proposals, with no commitment to their delivery, was unlikely to be acceptable.

In response to the MIR (OC33, Annex A), Transport Scotland had indicated that, when considering new stations, the potential benefits need to be balanced against the negative impacts on existing passengers and services and that value for money and affordability need to be robustly assessed. To date, no such assessment has been undertaken. Transport Scotland's representation on the Proposed Plan seeks rewording of bullet point four of policy CDP 11 to remove reference to land being safeguarded for a rail station at Drumchapel (West) as this has not resulted from an appropriate appraisal and has no current status in terms of funding or delivery. It also suggests that the wording gives the impression that these schemes are to a certain extent committed, thus providing misleading information within the Plan.

SPP states that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance (CE2, paragraph 277). CPD 11 indicates that land for this station will be safeguarded where it has been brought forward through study and where it has been justified by a STAG appraisal. This is not considered misleading. As a result, it is shown as a potential rail station, and not a proposed rail station, on Figure 19. It is considered that this reflects the spirit of Transport Scotland's representation.

If necessary, Supplementary Guidance will be brought forward in due course to identify any land which requires to be safeguarded.

No modifications recommended.

00177/3/009 Anthony Lennon, 00507/1/016 Roderick McDougall, 00556/1/008 Ken Sutherland - Under the Planning etc. (Scotland) Act 2006 (CE16), an Action Programme requires to be prepared, setting out the delivery details of each of the proposals contained in the Plan. In the absence of a funding commitment for a station at Ibrox, the Main Issues Report (CE8, Issue 4.3) had proposed that certain rail schemes and stations could be identified as 'aspirations' rather than firm proposals, providing for their development at a future date, should the funding position, and other considerations, allow. Subsequent meetings with the key agencies indicated that the safeguarding of 'aspirational' proposals, with no commitment to their delivery, was unlikely to be acceptable.

In response to the MIR (OC33, Annex A), Transport Scotland had indicated that Ibrox was almost certainly too close to the city centre for a heavy rail station to be viable; that a station at this location would be likely to need significant additional infrastructure to ensure that current services are not disrupted; and that there is currently a range of public transport options that already serve this location, including the Subway. Were this proposal to be pursued, appraisal would need to be undertaken and a source of funding for the capital cost would require to be identified.

SPP states that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance (CE2, paragraph 277). In the absence of such an appraisal or commitment to delivery, it

is considered that Ibrox cannot be included as a proposed rail station in the LDP.

No modifications recommended.

00623/1/001 Yorkhill and Kelvingrove Community Council - This is a proposal that was not included in the Main Issues Report in any form and has not, therefore, been subject to consultation with the public or with the Key Agencies. It is not included as a proposal in City Plan 2 and the objector has provided little evidence to support its inclusion as a proposal in the Plan, other than that public transport options in the area are not good to George Square. This is disputed, with Argyle Street being well served by the number 2 bus service (with a scheduled frequency of a bus every 6-7 minutes during the day), nearby Sauchiehall Street also having bus services, and with Exhibition Centre Station being a 5 minute walk from the proposed station location. Services on each of these bus and rail routes would deliver passengers to within a short walking distance of George Square.

SPP states that the strategic case for a new station should emerge from a complete and robust multimodal transport appraisal in line with Scottish Transport Appraisal Guidance (CE2, paragraph 277). In the absence of such an appraisal or commitment to delivery, it is considered that the LDP should not include a rail station at Finnieston as a proposal.

No modifications recommended.

#### Supporting

00177/3/007 Anthony Lennon, 00415/1/006 Ron McLean, 00420/1/004 Patricia Ferguson MSP, 00507/1/006 Roderick McDougall, 00556/1/003 Ken Sutherland - Noted.

No modifications recommended.

#### Other Rail

#### Objecting

00610/2/001 Glasgow Harbour Ltd - Scottish Planning Policy (CE2 - para 277) states that disused railway lines with a reasonable prospect of being reused as rail, tram, bus rapid transit or active travel routes should be safeguarded in development plans. The Council considered the former rail formations protected by City Plan 2, with SPT and others, prior to publishing the routes to be safeguarded in the Main Issues Report. This short stretch of the former rail formation is shown as a safeguarded rail formation on the Plan's Policy and Proposals Map. The City Plan 2 Proposals Map (CE17) does not identify this stretch for use as part of the Clyde Fastlink route, with the route utilising the former rail formation immediately to the west of this site. However, City Plan 2 does state (para 6.26) that "it should be noted that the routes shown on the Proposals Map ... are diagrammatic and that certain route details may be subject to amendment". In line with the approach taken in City Plan 2, the Policy and Proposals Map of the Proposed LDP shows the same route alignment for Fastlink. The Curle Street stretch, east of the toucan crossing of South Street, is not, currently, utilised for National Cycle Network 7.

Previous work had illustrated the potential which this piece of land could have to deliver Fastlink in association with the North Clydeside Development Route. This work, in 2009, indicated a crossover junction for Clyde Fastlink to the west of Ferryden Street to facilitate

access to the former railway solum between Ferryden Street and Burnham Road from the consented Clyde Fastlink reservation along the south side of Castlebank Street (OC41).

However, work has recently been undertaken which examines the need to utilise this stretch of former rail formation for Fastlink. It has concluded that the various potential transport demands at this location (including National Cycle Network route 7, Fastlink and the North Clydeside Development Route) could be accommodated in a way that does not require the full extent of this part of the disused rail line. Under this option (OC57), only a small section at the western end of this site, together with a narrow section along its southern edge, would be required to facilitate its re-use for Fastlink and a new footway.

Under this scenario, there would not be a reasonable prospect of re-using the full extent of the disused rail line at Curle Street for sustainable transport infrastructure. However, there are concerns that, should the “Safeguarded Rail Formation” status (on the Policy and Proposals Map) be removed, it may prove difficult to protect the land that is required to deliver Fastlink and the associated footway, should a development proposal propose an alternative use for this land.

Regarding the potential identification of this site as a housing opportunity, a live application for the site is currently being considered by the Council. It would be premature to amend the Policy and Proposals Map to show the site as part of the housing land supply prior to this application being determined.

The Reporter could, if so minded, amend the Policy and Proposals Map to show the stretch of former rail formation at Curle Street as “Safeguarded Rail Formation (in part)”. This would help ensure that the parts of this disused rail line that have a reasonable prospect of re-use for sustainable transport purposes will continue to be safeguarded, whilst intimating that the safeguarding doesn’t apply to all of the section.

00479/6/001 Hillhead Community Council - Scottish Planning Policy (CE2, paragraph 277) states that disused railway lines with a reasonable prospect of being reused as rail, tram, bus rapid transit or active travel routes should be safeguarded in development plans. The Plan has been drafted to reflect this approach, the Council having considered the former rail formations protected by City Plan 2 (CE17), with SPT and others, prior to publishing the Main Issues Report (MIR). The outcome was reflected on MIR (CE8) MAP1: Spatial Regeneration Framework, which identified the key routes considered to have a reasonable prospect of re-use for public transport or active travel.

Whilst, as part of a placemaking approach, it may be appropriate for developments to re-utilise other former rail formations for local connections, it is not considered appropriate, nor would it be in line with national policy, to safeguard all former rail formations.

No modifications recommended.

00669/1/006 Transform Scotland - It is assumed that the objector refers to the proposals for the East End Regeneration Route Phase 3 (Proposal T004) and the North Clydeside Development Route (Proposal T007). These are long-standing proposals, with the East End Regeneration Route (EERR) Phase 3 intended to complete the road, helping stimulate the regeneration of the East End of the City. The North Clydeside Development Route (NCDR) is intended to help serve, and facilitate, the major development areas on the north bank of the Clyde, in addition to taking strategic traffic off Dumbarton Road and providing environmental/ amenity benefits to local residents. The NCDR would involve

the use of a former rail line over part of its length.

With regard to the NCDR, the Council is proposing (see Issue 51) that a holistic examination of potential traffic and transport issues in the north west of the City be undertaken. This reflects proposals by Renfrewshire Council, through City Deal, for the development of a new road bridge across the Clyde, on the line of the Renfrew/Yoker Ferry. Should it be developed, the bridge would likely result in a marked change in traffic movements in the north west of the City, and could lead to a significant increase in traffic through existing residential areas. The proposed study would offer scope to examine the need for the scheme, its design and route alignment.

Should the NCDR and EERR proceed, then the Council would seek to ensure that benefits for walking and cycling were delivered in the surrounding areas, including helping to 'lock-in' the reduction in car use on surrounding streets through traffic management. Taking strategic traffic off of Dumbarton Road is one of the key aims of the NCDR, and this should help deliver a better environment for walking and cycling.

The Reporter could, if so minded, amend policy CDP11 by making reference to a requirement, where appropriate, to deliver benefits for pedestrians and cyclists in the streets surrounding new roads, through traffic management intended to lock-in the reduction in car use. This would bring clarity to this aspect of the policy.

### Reporter's conclusions:

#### Crossrail

1. The Crossrail scheme has been the subject of policies in the Joint Structure Plan and City Plan 2, and was intended to link the suburban rail networks both north and south of the Clyde, by re-opening the City Union Line with the addition of two new spurs. The project was not included in SDP Part 4 Spatial Framework 1 Schedule 4.

2 The Strategic Transport Projects Review (STPR) October 2008 was carried out on behalf of Transport Scotland, and made recommendations on land-based transport initiatives for delivery between 2012 and 2022. Each project was appraised on the basis of its contribution to the Government's Purpose and Key Strategic Outcomes of the National Transport Strategy.

3. Crossrail was the subject of such an appraisal in the STPR, which concluded that the proposed initiative does *"not make best use of the rail network or integrate well with the menu of schemes required to satisfy the objectives of the STPR"*, and *"the committed improvements on the rail network between Edinburgh and Glasgow also provide a 'step change' in the connectivity of Glasgow Central to Edinburgh, resulting in enhanced connections for those travelling to and from the south and south west of Glasgow. This is likely to negate much of the potential benefit of Glasgow Crossrail."* (STPR E3).

4. At the Main Issues Report (MIR) stage of the Proposed Plan, the council had included land to be safeguarded for the delivery of Crossrail and identified its implementation as an 'aspiration' rather than a plan proposal, due to the lack of committed funding and support from Transport Scotland. Keeping the project as an aspiration meant the council could potentially provide for its development in the future, should funding and support be available.

5. Following the MIR stage, meetings with the key agencies involved in the delivery of transport initiatives and the response of Transport Scotland to the MIR made clear that safeguarding ‘aspirational’ proposals in the Proposed Plan that had not been identified as having a commitment to delivery would not be acceptable.

6. On that basis, Crossrail was not included in the Proposed Plan. Key elements of the infrastructure required to deliver Crossrail are the existing City Union line and the Strathbungo link. Both of these elements are safeguarded in the Proposed Plan, as they are existing rail infrastructure.

7. The representations made in relation to the principle of Crossrail objected to the omission of Crossrail from the Proposed Plan, and sought to have the project reinstated as a policy objective.

8. I find that given the position of Transport Scotland and the lack of identified funding or support for Crossrail, there is no justification for including Crossrail in the Proposed Plan.

#### Other Crossrail Stations, Routes and Associated Matters

9. The comments and findings set out above in relation to the overall Crossrail project apply to each of the elements which were the subject of separate representations, each of which is considered below.

#### High Street Curve

10. Representations suggested that the High Street Curve (or St Johns Link) should be reinstated as part of Crossrail, as it would allow train services to run westward from High Street to Queen Street Low Level and to Charing Cross. An additional station at Glasgow Cross is also sought, along with the relocation of High Street Station to the west.

11. Representations also sought to see the High Street Curve reinstated to provide for ‘light rail rapid transport’. The land associated with new rail access points was also identified as being required to be safeguarded, along with the rail infrastructure it may serve.

12. The High Street Curve was intended to provide a link between the City Union Line and Queen Street Low Level line, as part of Crossrail. It is not an existing rail formation and so cannot be safeguarded under Policy CDP11.

13. There are no proposals for a light rail rapid transport system in Glasgow that include the High Street Curve, and such an initiative would be contingent on the City Union Line being used for passenger movement, and the Crossrail initiative going ahead. At present, neither is imminent or has the support of the key delivery agencies and so the inclusion of a light rail rapid transport use for the High Street Curve is not supported in the Proposed Plan.

14. As I have concluded that the overall Crossrail project will not be included in the Proposed Plan, it follows that the associated rail links, potential new stations, relocated stations and associated operational land would not be required in the Plan period. I conclude that there will be no modification to the Proposed Plan.



### Strathbungo Link

15. The Strathbungo Link is an existing rail formation which is to be safeguarded in the Plan. Representations object to its non-inclusion in the Proposed Plan as part of the overall Crossrail project.

16. As I have concluded that the overall Crossrail project will not be included in the Proposed Plan, it follows that the associated rail links, including the Strathbungo Link, would not be required in this Plan period. I conclude that there will no modification to the Proposed Plan, though I note that the Strathbungo Link will be safeguarded as an existing rail formation under the terms of bullet point 1 of Policy CDP11.

### Kelvinhaugh Turnback

17. As part of the overall Crossrail project, it would have allowed trains coming from the east to turn into a siding and return eastward, avoiding the congested Argyle and Queen Street Low Level lines. It would also allow trains to stop short of Partick, freeing up capacity on the network.

18. It was included as part of the Crossrail Project, and as I have concluded that the overall Crossrail project will not be included in the Proposed Plan, it follows that the associated rail infrastructure, including the Kelvinhaugh Turnback, would not be required in this Plan period. I conclude that there will no modification to the Proposed Plan, but note that the Kelvinhaugh Turnback will continue to be safeguarded in the Proposed Plan as part of existing operational rail land under the terms of bullet point 1 of Policy CDP11.

### Rail Stations at West Street, Glasgow Cross and Gorbals

19. Representations sought the inclusion of railway stations associated with Crossrail at West Street and Glasgow Cross, on the City Union line. The council supports the potential stations as they would provide interchange possibilities with the Argyle line and the Subway, should the Crossrail project proceed.

20. However, these stations were included in the Proposed Plan as part of the Crossrail Project, and as I have concluded that the overall Crossrail project will not be included in the Proposed Plan, it follows that the associated rail infrastructure, including railway stations at West Street and Glasgow Cross, would not be required in this Plan period.

21. I conclude that there will no modification to the Proposed Plan and that the land for both West Street and Glasgow Cross stations will continue to be safeguarded in the Proposed Plan as part of existing operational rail and / or council owned land.

22. A new station at Gorbals would also have formed part of the Crossrail project, without the additional benefit of strategic rail interchange opportunities. The potential site for the station is currently operational rail land, and the site is currently safeguarded in the Proposed Plan. As with the other stations, since I have concluded that the overall Crossrail project will not be included in the Proposed Plan, it follows that the associated rail infrastructure, including a railway station at Gorbals, would not be required in this Plan period.

23. I conclude that there will no modification to the Proposed Plan, but note that the land for a station at Gorbals will continue to be safeguarded in the Proposed Plan as part of

existing operational rail land under the terms of bullet point 1 of Policy CDP11.

#### Muirhouse Link

24. Prior to STPR, the Muirhouse Link had been included in a 2005 STAG 1 appraisal of the Crossrail project, but was not carried forward to the STAG 2 report, as the Strathbungo Link was considered to provide greater benefits. The Muirhouse Link was not included in City Plan 2, and is not safeguarded in the Proposed Plan as it would be a new rail line.

25. Representations seek to include the Muirhouse Link as part of the overall Crossrail project. As I have concluded that the overall Crossrail project will not be included in the Proposed Plan, it follows that the associated rail infrastructure, including the Muirhouse Link, would not be required in this Plan period. I conclude that there will no modification to the Proposed Plan and that the Muirhouse Link will continue to be safeguarded in the Proposed Plan as part of existing operational rail land.

#### Garngad Chord

26. The Garngad Chord is a piece of infrastructure which would reduce travel time on the Cumbernauld line and remove the need for trains to reverse at Springburn to access the Queen Street Low Level. It also formed part of the Crossrail project.

27. In its submission to the Main Issues Report stage of the Proposed Plan, Transport Scotland indicated that the Chord had been removed from the Edinburgh to Glasgow Improvements Programme (EGIP), as the required outputs could be delivered more efficiently without it. Transport Scotland has suggested that the safeguarding of the land for the Chord would be welcome in this Plan.

28. Other representations seek to have the Chord identified in the Proposed Plan and object to its omission.

29. As Transport Scotland has confirmed that it is not required as part of the EGIP programme, and that it has been removed from the programme, it cannot be identified in Policy CDP11. In relation to safeguarding the land, it is not in operational rail use, a former rail line or in the ownership of the council and so cannot be safeguarded under the provisions of SPP paragraph 277.

30. I conclude that as the overall Crossrail project will not be included in the Proposed Plan, it follows that the associated rail infrastructure, including the Garngad Chord would not be required in the Plan period. In addition, it has been confirmed that the Chord is excluded from the EGIP programme scope. I also conclude that the site for the Chord cannot be safeguarded in the Proposed Plan for the reasons set out above and so there will no modification to the Proposed Plan.

#### Glasgow Airport Access

31. Representations seek to have the rail link to Glasgow Airport included in Policy CDP11 of this Plan. Representations also seek to see the rail link as a “heavy rail” link as opposed to a light rail or tram system, as this would open possibilities for connections through the City and on to Edinburgh and further afield.

32. The council considers that as the proposed link will use existing infrastructure in the form of the third rail track to Paisley and the existing platform provision at Glasgow Central Station, the Proposed Plan cannot safeguard land for the proposal. The agreed City Deal will deliver a rail link and the options considered for delivering the airport rail link were considered in the Glasgow Airport Strategic Transport Appraisal, but the actual form of the rail provision has not yet been decided. The Council has suggested that additional text be added to the context for Policy CDP11 at page 56 to acknowledge the delivery of the rail link.

33. I find that in order to provide clarity, the route of the proposed rail link should be added to Figure 19 Policy Context Diagram on page 57 of the Proposed Plan and included in the list of Aims on the same page. Consequently, the wording of the Policy will require amendment to reflect those changes, and I set that out in the recommendations at the end of this issue. The council's suggested additional text for the context section on page 56 will also be added for completeness.

34. These modifications will reflect the appropriate representations made, and ensure that a major rail infrastructure project to be delivered in the City is properly reflected in the Proposed Plan. The inclusion of the proposed rail link in Policy CDP11 will provide clarity for those using the Proposed Plan, and those making decisions based on the Proposed Plan.

#### High Speed Rail

35. NPF2 (and now NPF3) has identified High Speed Rail as a national development. The Glasgow and Clyde Valley Strategic Development Plan 2012 (SDP) requires the council to take early action to identify a location in central Glasgow for a High Speed Rail terminus.

36. At the MIR stage, three potential locations for a terminus were identified in the Proposed Plan. Subsequently, a Scottish Partnership Group was established to identify a location. Once that location has been identified, the council is empowered to secure and safeguard the chosen terminal site.

37. To date, the Partnership Group has not reported on a preferred site for the terminus. The Council has expressed concern regarding the progress of the report, and is anxious that unless the potential sites are safeguarded, they may be compromised by unrelated developments.

38. Some representations wish to have the potential sites safeguarded. Others who wish to see them removed consider that the SDP requirement is for the Proposed Plan to safeguard the land after the location has been identified, and that it is inappropriate to safeguard a number of sites prior to the report of the Partnership Group.

39. I find that the council's policy approach at bullet point 5 of the Policy CDP11 directly addresses the concerns raised about prematurity and compliance with the SDP. It is worded sufficiently precisely to ensure that only the site identified by the Partnership Group will be safeguarded, but both candidate sites are clearly identified at this stage. This approach also satisfies the representations seeking the safeguarding of a site for the terminus.

40. The council has suggested in the context on page 57 that Supplementary Guidance

(SG) would be required to clarify the extent of any site and to protect any necessary connections. I agree that SG would provide additional clarity which cannot be provided at present.

41. I recommend that the Proposed Plan be modified to reflect the aim to provide SG by adding 'High Speed Rail Terminus' to the list of Relevant Supplementary Guidance on page 57 of the Proposed Plan.

### Rail Stations

42. A number of stations had been identified at the MIR stage of the Proposed Plan process as 'aspirations', as the Action Programme did not commit any funding and delivery details to their delivery in the Plan period.

43. Following the MIR, meetings with the key agencies involved in the delivery of transport initiatives and the response of Transport Scotland to the MIR made clear that safeguarding 'aspirational' proposals in the Proposed Plan that had not been identified as having a commitment to delivery would not be acceptable.

44. In addition, SPP at paragraph 277 sets out that new transport infrastructure such as new rail stations should emerge from transport appraisals that have been prepared in line with Scottish Transport Appraisal Guidance (STAG). If such an appraisal has not been carried out, then SPP says that new rail stations should not be included as proposals in development plans.

45. A number of representations have suggested that new rail stations are added to the network in Glasgow.

### Blochairn/Garngad

46. A new station at Blochairn / Garngad has been proposed. It has not been the subject of a STAG appraisal and has no committed funding. Transport Scotland has indicated that there is no overall benefit in providing the new station.

47. I conclude that in the absence of any appraisal or committed funding, and as the site of the proposed station is not in operational rail use, a former rail line or in the ownership of the council, it cannot be safeguarded under the provisions of SPP paragraph 277 or allocated for development in Policy CDP11 of the Proposed Plan. There is no modification to the Proposed Plan.

### Jordanhill

48. A replacement station has been proposed at Jordanhill (West), to support the teacher training college and new development. Transport Scotland has indicated that the relocation of the existing station would not have a strategic impact, but that there is no committed funding and any relocation would have to be developer / promoter funded.

49. I conclude that in the absence of any appraisal or committed funding, and as the site of the proposed relocated Jordanhill (West) station is not in operational rail use, a former rail line or in the ownership of the council, it cannot be safeguarded under the provisions of SPP paragraph 277 or allocated for development in Policy CDP11 of this Plan. There is no modification to the Proposed Plan.

Finnieston North (Yorkhill)

50. A new station has been proposed at Finnieston North (Yorkhill). There was no supporting documentation with this representation, and the site of the proposed rail station was not included in the MIR, and so has not been through any form of consultation with any of the key agencies or the public as part of the Proposed Plan process.

51. The response of Transport Scotland to the MIR made clear that safeguarding 'aspirational' proposals in the Proposed Plan that had not been identified as having a commitment to delivery would not be acceptable.

52. In addition, SPP at paragraph 277 sets out that new transport infrastructure such as new rail stations should emerge from transport appraisals that have been prepared in line with Scottish Transport Appraisal Guidance (STAG). If such an appraisal has not been carried out, then SPP says that new rail stations should not be included as proposals in development plans.

53. I conclude that in the case of a new rail station at Finnieston North (Yorkhill), in the absence of any Plan or STAG appraisal or committed funding, and as the site of the proposed station is not in operational rail use, a former rail line it cannot be safeguarded under the provisions of SPP paragraph 277 or allocated for development in Policy CDP11 of the Proposed Plan. There is no modification to the Proposed Plan.

Finnieston

54. The reinstatement of the former Finnieston Station on the line where it passes under Argyll Street is sought. There was no supporting documentation with this representation, and the site of the proposed rail station was not included in the MIR, and so has not been through any form of consultation with any of the key agencies or the public as part of this Proposed Plan process.

55. The response of Transport Scotland to the MIR made clear that safeguarding 'aspirational' proposals in the Plan that had not been identified as having a commitment to delivery would not be acceptable.

56. In addition, SPP at paragraph 277 sets out that new transport infrastructure such as new rail stations should emerge from transport appraisals that have been prepared in line with Scottish Transport Appraisal Guidance (STAG). If such an appraisal has not been carried out, then SPP says that new rail stations should not be included as proposals in development plans.

57. In addition, public transport services in the vicinity of the proposed station are good, with both rail and bus options.

58. I conclude that in the case of a new rail station at Finnieston, in the absence of any Plan or STAG appraisal or committed funding, and as the site of the proposed station is not in operational rail use or a former rail line, it cannot be safeguarded under the provisions of SPP paragraph 277 or allocated for development in Policy CDP11 of the Proposed Plan. There is no modification to the Proposed Plan.

Partick Central

59. A new station has been proposed at Partick Central. There was no supporting documentation with this representation, and the site of the proposed rail station was not included in the MIR, and so has not been through any form of consultation with any of the key agencies or the public as part of the Plan process.

60. The response of Transport Scotland to the MIR made clear that safeguarding 'aspirational' proposals in the Proposed Plan that had not been identified as having a commitment to delivery would not be acceptable.

61. In addition, SPP at paragraph 277 sets out that new transport infrastructure such as new rail stations should emerge from transport appraisals that have been prepared in line with Scottish Transport Appraisal Guidance (STAG). If such an appraisal has not been carried out, then SPP says that new rail stations should not be included as proposals in development plans.

62. I conclude that in the case of a new rail station at Partick Central, in the absence of any Plan or STAG appraisal or committed funding, and as the site of the proposed station is not in operational rail use or a former rail line, it cannot be safeguarded under the provisions of SPP paragraph 277 or allocated for development in Policy CDP11 of the Proposed Plan. There is no modification to the Proposed Plan.

Parkhead Forge and Drumchapel West

63. The sites at Parkhead Forge and Drumchapel West have been identified in the Proposed Plan under Policy CDP11 as "potential" new rail stations. Representations supported the new stations. Transport Scotland in its MIR response had indicated support for the stations, but resource constraints have meant that no appraisals have been carried out to date.

64. A further representation to the Proposed Plan sought to have the reference to the stations removed on the basis that there is no Plan or STAG appraisal or committed funding.

65. The Council considers that its reference to the new stations as 'potential' rather than 'proposed' means that it is compliant with SPP and addresses concerns regarding stations which have not yet been appraised. The council has also suggested that SG could be brought forward to identify any land which requires to be safeguarded.

66. I find that the approach of the council is reasonable, as it will ensure that new rail stations which have the support of key agencies are properly identified in the Proposed Plan. Specifically bullet point 4 of Policy CDP11 sets out that a STAG appraisal is required before the projects can become proposals. SG for safeguarded land is, to my mind, unnecessary, as the Policy clearly sets out what is required to deliver the potential rail station.

67. I conclude that no modification is required to the Proposed Plan.

Ellismuir Farm

68. A new station has been proposed at Ellismuir Farm. There was no supporting

documentation with this representation, and the site of the proposed rail station was not included in the MIR, and so has not been through any form of consultation with any of the key agencies or the public as part of this Plan process.

69. The response of Transport Scotland to the MIR made clear that safeguarding 'aspirational' proposals in the Proposed Plan that had not been identified as having a commitment to delivery would not be acceptable.

70. In addition, SPP at paragraph 277 sets out that new transport infrastructure such as new rail stations should emerge from transport appraisals that have been prepared in line with Scottish Transport Appraisal Guidance (STAG). If such an appraisal has not been carried out, then SPP says that new rail stations should not be included as proposals in development plans.

71. I conclude that in the case of a new rail station at Ellismuir Farm, in the absence of any Plan or STAG appraisal or committed funding, and as the site of the proposed station is not in operational rail use or a former rail line it cannot be safeguarded under the provisions of SPP paragraph 277 or allocated for development in Policy CDP11 of the Proposed Plan. There is no modification to the Proposed Plan.

#### Glasgow Green

72. A new station has been proposed at Glasgow Green. There was no supporting documentation with this representation, and the site of the proposed rail station was not included in the MIR, and so has not been through any form of consultation with any of the key agencies or the public as part of this Plan process.

73. The response of Transport Scotland to the MIR made clear that safeguarding 'aspirational' proposals in the Proposed Plan that had not been identified as having a commitment to delivery would not be acceptable.

74. In addition, SPP at paragraph 277 sets out that new transport infrastructure such as new rail stations should emerge from transport appraisals that have been prepared in line with Scottish Transport Appraisal Guidance (STAG). If such an appraisal has not been carried out, then SPP says that new rail stations should not be included as proposals in development plans.

75. I conclude that in the case of a new rail station at Glasgow Green, in the absence of any Plan or STAG appraisal or committed funding, and as the site of the proposed station is not in operational rail use or a former rail line, it cannot be safeguarded under the provisions of SPP paragraph 277 or allocated for development in Policy CDP11 of the Proposed Plan. There is no modification to the Proposed Plan.

#### Germiston (Broomfield Road)

76. A new station at Germiston (Bloomfield Road) has been proposed. It has not been the subject of a STAG appraisal and has no committed funding. Transport Scotland has indicated that there is no overall benefit in providing the new station, as it is too close to the city centre and use of the existing stations on that line is low.

77. I conclude that in the absence of any appraisal or committed funding, and as the site of the proposed station is not in operational rail use or a former rail line it cannot be

safeguarded under the provisions of SPP paragraph 277 or allocated for development in Policy CDP11 of the Proposed Plan. There is no modification to the Proposed Plan.

### Ibrox

78. A new station at Ibrox has been proposed. It has not been the subject of a STAG appraisal and has no committed funding. Transport Scotland has indicated that there is no overall benefit in providing the new station, as it would be likely to need significant additional infrastructure, it is already well served by public transport including the Subway, and a source of funding has not been identified.

79. I conclude that in the absence of any appraisal or committed funding, and as the site of the proposed station is not in operational rail use or a former rail line, it cannot be safeguarded under the provisions of SPP paragraph 277 or allocated for development in Policy CDP11 of the Proposed Plan. There is no modification to the Proposed Plan.

### Robroyston

80. Representations were received supporting the safeguarding of land for Robroyston Station. The support expressed is acknowledged, and there is no modification to the Proposed Plan.

### Other Rail Formations

#### Land at Curle Street/Ferryden Street

81. Representations were made objecting to the safeguarding of the above land in order to facilitate the delivery of Clyde Fastlink. The representation sought to have the site allocated for residential use under Policy CDP10 Meeting Housing Needs.

82. The council advises that recent studies indicate that the full extent of the former rail formation at Curle Street/Ferryden Street might not be required to deliver Fastlink and the associated footway.

83. The council has suggested that the Policy and Proposals Map could be amended to show the whole stretch of the rail formation but change the notation to say 'Safeguarded Rail Formation (in part)'.

84. I have found that the route alignment for Fastlink is diagrammatic, and does not actually include the site in question but shows it as a safeguarded rail formation. A planning application is currently being considered by the council for residential development, and I agree that until that application is determined, an allocation in the Proposed Plan for residential development under Policy CDP10 would be premature. In order to facilitate the best use of the site, I agree that changing the notation to reflect that only part of the site is likely to be required would resolve the issue in terms of a plan allocation, and removing doubt.

85. I conclude that the Proposed Plan should be modified in accordance with the proposed amendment to the Policy and Proposals Map, by including the words '(in part)' in the notation.



### Safeguarding of all Rail Routes

86. A representation has been made seeking to safeguard all rail formations in the Proposed Plan.

87. Following the MIR stage of this Plan, meetings with the key agencies involved in the delivery of transport initiatives and the response of Transport Scotland to the MIR made clear that safeguarding ‘aspirational’ proposals in the Proposed Plan that had not been identified as having a commitment to delivery would not be acceptable.

88. I conclude that in preparing the Proposed Plan, the council has specifically addressed the issue of disused rail formations at the MIR stage and the Proposed Plan reflects those which have a reasonable prospect of delivering public transport. There is no modification to the Proposed Plan.

### Rail Routes Converted into ‘Relief Roads’

89. This representation does not specify which routes it is referring to, but it is assumed that they are the East End Regeneration Route Phase 3 (EERR) and the North Clydeside Development Route (NCDR).

90. The representation seeks to ensure that traffic is not simply provided for with an increase in capacity, and that the new routes would assist with a reduction in car use in surrounding areas through design and management.

91. The council has suggested an amendment to Policy CDP11, which I find would be best included in the final paragraph and would address the issues raised in the representation. The Proposed Plan should be amended accordingly.

### **Reporter’s recommendations:**

Modify the Proposed Plan as follows:

- Add the route of the proposed rail link Glasgow Airport Access to Figure 19 Policy Context Diagram on page 57 of the Plan and include it in the list of Aims on the same page.
- Add a new bullet point 2 to Policy CDP11 as follows: *“The route of the Rail Link to Glasgow Airport”*.
- Insert new text into the context on page 56, at the end of paragraph 2 to read: *“The Glasgow Airport Strategic Transport Appraisal study considered options for delivering a new public transport link to Glasgow Airport. The City Deal agreed by the Glasgow and Clyde Valley local authorities will deliver a new rail link to Glasgow Airport, however the link will have no physical land take implications for Glasgow.”*
- Add *“High Speed Rail Terminus”* to the list of Relevant Supplementary Guidance on page 57 of the Proposed Plan.
- Amend the notation relating to Curle Street on the Policy and Proposals Map to read *“Safeguarded Rail Formation (in part)”*.
- Insert a new fourth paragraph in Policy CDP11 to read: *“New road schemes will be required to deliver, where appropriate, benefits for pedestrians and cyclists in the streets surrounding the route of any new road, through traffic management measures which will achieve a reduction in car use.”*

Issue 50	Transport Proposal T002 - Fastlink	
Development plan reference:	Policy CDP 11 Sustainable Transport (Pages 56-58) Policy and Proposals Map	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
Andrew Fraser (00392) Hillhead Community Council (00479) Intu Properties plc (00560) Richard Baynes (00600) Dumbarton Road Corridor Environment Trust (00620) Whiteinch Community Council (00622) Strathclyde Partnership for Transport (00633) Dowanhill Hyndland and Kelvinside Community Council (00637) West Dunbartonshire Council (00806) Martin Kerr (00816)		
Provision of the development plan to which the issue relates:	The promotion of a Fastlink scheme intended to help deliver enhanced public transport accessibility to the Clyde Waterfront and major new developments such as the new South Glasgow Hospital. It is proposed that the Plan safeguards land to extend the Fastlink Core route, currently under construction. The proposed extensions would run to Renfrew and Clydebank.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00600/1/001 Richard Baynes - Opposes proposal T002 to build the Fastlink bus route on the former rail formation in Scotstoun and Whiteinch. This will result in the removal of the existing cycleway and its replacement with an intrusive road in an otherwise quiet area. This will result in a considerable loss of amenity - the cycleway is in effect a linear park, used for cycling, quiet recreation and dog-walking. A replacement cycleway along the riverside would not serve the same local function; and if a cycletrack was put alongside the bus lane it would not work the same way. Two cycleways, one along the river and the existing one, would be a fabulous amenity and demonstrate real commitment to green and healthy living. South Street would be a great alternative for running a rapid bus service.  00620/1/001 Dumbarton Road Corridor Environment Trust - Opposes Proposal T002 to build the Fastlink bus route on the former rail formation in Scotstoun and Whiteinch (National Cycle Network route 7). Fastlink should run along South Street and the existing cycle path should remain as a traffic free active travel route and a green corridor. If not, the proposal does not meet most of the aims of Policy CDP 11, including discouraging non-essential car journeys; encouraging opportunities for active travel; reducing pollution and other negative effects associated with vehicular travel; and optimising the sustainable use of transport infrastructure. The proposal will reduce the number of people walking and cycling along the route and result in the loss of the green corridor. The use of South Street would reduce the amount of road traffic whilst offering an alternative for car journeys.		

00622/1/001 Whiteinch Community Council - General support for Proposal T002 to build the Fastlink bus route extension from the SECC to Clydebank, including using the section of the existing cycle path from Smith Street in Whiteinch to Burnham bridge at the bottom of Anniesland Road (National Cycle Network route 7). However, questions whether there is a business case to support this proposal. Support is conditional on there remaining a segregated cycle path to serve the area, together with a review of sustainable transport options and protection of the existing green corridor.

00816/1/001 Martin Kerr - Opposes proposal T002 to build the Fastlink bus route on the former rail formation in Scotstoun, Whiteinch and Yoker. There is no need for the scheme as there is already a bus lane on Dumbarton road at this location. The proposals would devalue my property and result in noise and disruption at all hours of the day. It would result in the loss of a wooded area, which should be protected. It will make accessing my home more difficult.

00479/11/001 Hillhead Community Council - Objection to the reliance on Fastlink for travel to the Southern General. This depends, crucially, on adequate flood protection and drainage management. The route is prone to flooding both along the Clyde and at approaches to the Squinty Bridge.

00633/18/008 Strathclyde Partnership for Transport - Figure 19 Policy Context Diagram - Suggested change: In addition to showing the Fastlink core scheme and proposed route, the map should also illustrate the potential roll out of Fastlink standard on Quality Bus Corridors

00633/18/009 Strathclyde Partnership for Transport – Policy CDP11 - Suggested Change: safeguard Quality Bus Corridors to enable the potential roll-out of Fastlink standard to additional corridors.

00392/1/003 Andrew Fraser - Would like to see a cycle path along Dumbarton Road going into the city centre from Yoker.

#### Supporting

00560/1/001 Intu Properties plc - Supports proposal T002 for an extension of Fastlink from the Southern General Hospital to King George V Dock and the Renfrewshire Council boundary. This will support sustainable transport and better connectivity between Glasgow and Renfrewshire, and will assist with the regeneration of Clyde Waterfront.

00637/21/003 Dowanhill Hyndland and Kelvinside Community Council - Supports proposal T002 to build the Fastlink bus route.

00806/1/002 West Dunbartonshire Council - Proposal T002 - support for the identification of the Fastlink route along the north of the Clyde towards West Dunbartonshire.

#### **Modifications sought by those submitting representations:**

00600/1/001 Richard Baynes, 00816/1/001 Martin Kerr - Remove proposal T002 from the City Development Plan.

00620/1/001 Dumbarton Road Corridor Environment Trust - Revise the route alignment of Proposal T002 from the former rail formation onto South Street.

00622/1/001 Whiteinch Community Council - The Plan should be amended to indicate that Proposal T002 (Fastlink) will only be acceptable where a segregated cycle path to serve the area can be provided/retained and the existing green corridor protected.

00479/11/001 Hillhead Community Council - The City Development Plan should not indicate that Fastlink is relied upon to provide access to the Southern General.

00633/18/008 Strathclyde Partnership for Transport - Amend Figure 19 by illustrating the potential roll out of Fastlink standard on Quality Bus Corridors.

00633/18/009 Strathclyde Partnership for Transport - Policy CDP11 should be reworded to safeguard Quality Bus Corridors to enable the potential roll-out of Fastlink standard to additional corridors.

00392/1/003 Andrew Fraser - The City Development Plan should identify a route for a cycle path, along Dumbarton Road, from Yoker to the City Centre.

### Summary of responses (including reasons) by planning authority:

#### Objecting

00600/1/001 Richard Baynes, 00620/1/001 Dumbarton Road Corridor Environment Trust, 00622/1/001 Whiteinch Community Council, 00816/1/001 Martin Kerr - Fastlink is a bus rapid transit scheme designed to deliver better public transport connectivity to the River Corridor, west of the City Centre. Fastlink is promoted in City Plan 2 (CE17, policy TRANS 1) with route alignments from the City Centre to the city boundary, on both the north and south banks of the Clyde, being safeguarded. The scheme was originally intended for use by buses but was designed to facilitate upgrading to rail based light rapid transit at a later date. It is now agreed that the routes will be used by modern buses – no future upgrade to LRT is now anticipated.

A core scheme has been funded by the Scottish Government and is currently under construction and anticipated to be operative in summer 2015. It comprises a City Centre loop and a, mainly segregated, route along the north bank as far as the Clyde Arc Bridge, where it crosses the river and runs westwards, through Pacific Quay and Govan, to terminate at the new South Glasgow Hospital (OC96).

City Plan 2 (CE17) had promoted additional routes on the north and south banks, with the north bank route terminating in Clydebank and the south bank terminating in Renfrew. SPT remain committed to Fastlink Services on these routes, and they are shown as Proposal T002 on the Policy and Proposals Map of the Proposed LDP. On the south bank, this includes a connection through the industrial area to the west of the South Glasgow Hospital to a similarly safeguarded route in the Renfrewshire LDP. On the north bank, Fastlink would make use of a former rail line along which National Cycle Network 7 (between Glasgow and Loch Lomond) currently runs. Under current plans, the elevated rail line would be razed to provide space for both Fastlink and the cycle path at street level. This would require some road closures to provide for as little interruption to the cycle path as possible.

As things stand, razing the former rail line would mean loss of the green corridor as it currently exists. However, it is anticipated that landscaping of the land around the new Fastlink route and cycle path could help compensate, in some part, for the loss, and

would maintain the active travel route along its current alignment. Use of the former rail formation for active travel and public transport would accord with Scottish Planning Policy. The replacement route could be complementary to a potential new route along much of the riverfront, which policy CDP11 and the Policy and Proposals Map identify as an aspirational pedestrian/cycle link to be delivered through development proposals. The Plan proposes the use of South Street for the North Clydeside Development Route (NCDR) and, as things currently stand, there would be limited scope to utilise South Street for Fastlink too. Impact on property values is not a material planning consideration.

However, Renfrewshire Council has brought forward Plans, through City Deal, for the development of a new road bridge across the Clyde, on the line of the Renfrew/Yoker Ferry (part of the Clyde Waterfront and Renfrew Riverside City Deal project). This bridge, should it be developed, would likely result in a marked change in traffic movements in the north west of the City. The potential impacts of the development of this bridge, and the potential opportunities arising from it, indicate that a holistic examination of potential traffic and transport issues in this part of the City, including Fastlink and the NCDR, would be prudent. This North West Glasgow Transport Study (see Issue 51) would offer scope to examine the design and route alignment of the scheme. However, it is considered that the existing route alignment should be safeguarded pending the outcome of this study.

The Reporter could, if so minded:

- amend bullet point 2 of Policy CDP11 to read: 'land required for Fastlink, Robroyston Station and road schemes, as shown on Figure 19 (land for Fastlink and the North Clydeside Development Route to be safeguarded pending the outcomes of a study into traffic and transportation issues in the North West of the City)'. This would reflect the changed context, including City Deal, and would provide clarity on how it should be addressed;
- amend the fifth paragraph of the context to policy CDP11 by adding a new sentence, after the fifth sentence, to read: 'On the north bank, it is proposed that the route will utilise a former rail formation, currently used as part of the National Cycle Network. A segregated walking and cycling route, on this alignment, will require to be provided as part of the Fastlink proposal.' This would better reflect the Council's intentions for the former rail line.

00479/11/001 Hillhead Community Council - The Plan (context to policy CDP11) states that Fastlink is intended to help deliver enhanced public transport activity to major destinations such as the New South Glasgow Hospital, but does not indicate that Fastlink is relied upon to provide access to the hospital. The hospital is also served by other bus services (providing connections with Govan Subway Station) and a network of active travel routes is being developed in its vicinity. Flooding and drainage issues along the river are addressed by the River Clyde Flood Management Strategy. This is set out in City Plan 2 and the draft Water Management Supplementary Guidance (OC66, Introduction) indicates that it will be brought forward as Supplementary Guidance to the LDP.

No modifications recommended.

00633/18/008, 00633/18/009 Strathclyde Partnership for Transport - There are no firm plans to roll out the Fastlink scheme to routes which are not either the subject of the Core Scheme or a proposed extension to it, as shown on the Policy and Proposals Map. There

is also no indication of precisely which routes would form part of such a roll out.

The current Fastlink schemes involve the reservation of land for the development of the route, and there is, therefore, a justification for their inclusion in the Plan. However, the suggestion would appear to be that potential extensions to the Fastlink routes currently identified in the Plan would be along Quality Bus Corridors. The Plan exerts little control over use of public roads, including adaptation of Quality Bus Corridors (arterial routes with on-road traffic management measures designed to deliver more reliable bus services). As a result, it is not considered appropriate to amend either Figure 19, or Policy CDP11 itself, to illustrate or safeguard potential Fastlink routes, at least not until greater clarity is provided in terms of any land take.

No modifications recommended.

00392/1/003 Andrew Fraser - At present, residential parking on both sides of Dumbarton Road means there is very little space for the existing general traffic flows – there would be little opportunity to insert a cycle path as things stand. There is an existing cycle route, mainly off-road, which runs through the area, on an elevated former railway just south of, and parallel to, Dumbarton Road. The Proposed Plan shows this former railway being used for Fastlink, but this would include retention of a segregated cycle path.

In addition, the Council is proposing that a holistic examination of potential traffic and transport issues in the north west of the City be undertaken (the North West Glasgow Transport Study - see Issue 51). This reflects proposals by Renfrewshire Council, through City Deal, for the development of a new road bridge across the Clyde, on the line of the Renfrew/Yoker Ferry. Should it be developed, the bridge would likely result in a marked change in traffic movements in the north west of the City, and could lead to a significant increase in traffic through existing residential areas. The proposed study could include an examination of the design and route alignment of Fastlink at this location.

It is considered that the existing cycle path on the former railway, or its retention as a new segregated route should Fastlink proceed on the line of the former railway, means that a cycle path on Dumbarton Road is not necessary. The North West Glasgow Transport Study may offer opportunities for taking strategic traffic off of Dumbarton Road, and this could also help deliver a better environment for walking and cycling (see Issue 49 00669/1/006).

No modifications recommended.

#### Supporting

00560/1/001 Intu Properties plc, 00637/21/003 Dowanhill Hyndland and Kelvinside Community Council, 00806/1/002 West Dunbartonshire Council - Noted.

No modifications recommended.

#### **Reporter's conclusions:**

##### Loss of cycleway

1. Representations are seeking to retain the existing segregated cycleway which utilises the former rail formation. Under Transport Proposal T002 Fastlink, the cycleway would

be removed, and the proposed replacement would not serve the same local function. South Street is proposed as an alternative to the proposed route.

2. The council suggests that the new Fastlink and cycle path would partially compensate for the loss of the existing facility. The use of the former rail formation for Fastlink is in accordance with both Scottish Planning Policy (SPP) and the overall strategy of the Proposed Plan. South Street is currently safeguarded for the delivery of the North Clydeside Development Route (NCDR) (Issue 51) and would not be able to accommodate Fastlink as well.

3. Through City Deal, Renfrewshire Council are bringing forward plans for a bridge across the Clyde, which if delivered could have major implications for traffic movement in the Clydeside area. As part of the council's response to Issue 51, a study of traffic and transport issues in north west Glasgow has been proposed, the North West Glasgow Transport Study (NWGTS). This study is not yet complete, but may mean that the current transport proposals for this area in the Proposed Plan could be subject to change and amendment. Until the NWGTS is complete, the Council wishes to safeguard the proposed routes in the Proposed Plan.

4. The council has suggested amendments to the text of bullet point 2 of Policy CDP11 and the context to better reflect their intentions. The proposed amendments are the same as those proposed in Issue 51.

5. I conclude that until the NWGTS is complete, it would be prudent to safeguard the potential route of Fastlink as it is currently shown on the Policy and Proposals Map. South Street is currently required to deliver the NCDR, and would not be able to accommodate Fastlink as well. I find that the proposed replacement cycle route on the river bank would provide a similar amenity to residents and users of the existing facility, albeit in a different setting.

6. The proposed text changes to Policy CDP11 include a specific reference to a new cycle way to be included in the context text preceding the Policy, and I consider that this amendment addresses the representations made on the issue.

#### Potential impact on residential amenity

7. The representation relates to the potential impact the increased traffic movement from Fastlink could have on residential properties, in terms of noise and access.

8. The council considers that the proposed landscaping around the proposed route would minimise any potential impact.

9. In accordance with my conclusions at Issue 51 of this report, I find that in order to fully assess the potential impact of Fastlink, additional text is required to be added to the proposed change to bullet point 2 of Policy CDP11. This amendment will ensure that the NWGTS will assess the potential impact on residential amenity and set out any mitigation measures, if required. The amendment is set out in the recommendations below.

#### Access to Southern General Hospital

10. The representation raises concerns regarding over-reliance on Fastlink as a mode of access to the Hospital, particularly in relation to the potential for flooding along the route.

11. The council considers that Fastlink is only one of a number of transport options available, and that the hospital is not reliant on Fastlink for access. The potential for flooding is noted and is being addressed in forthcoming Supplementary Guidance (SG) on Water Management.

12. I conclude that there is not an absolute reliance on Fastlink for public transport access to the Southern General Hospital, which is well served by a number of bus routes. The potential for the route to flood is being addressed by the River Clyde Flood Management Strategy and the proposed SG. There is no modification to the Proposed Plan.

#### Fastlink and other routes

13. At present, the core Fastlink route is operational in Glasgow, and has reduced travel times by up to 15%. Transport Proposal T002 of this Plan illustrates the committed routes for the extension of Fastlink north and south of the Clyde.

14. The representation seeks to have all existing Quality Bus Corridors in the Plan area identified as potential Fastlink routes.

15. I find that there is no evidence before me that demonstrates that all Quality Bus Corridors will be upgraded to Fastlink routes. There appears to be no committed capital programme to deliver such upgrades in the Plan period, or identification of the sites required to deliver the routes. On that basis, I conclude that the Proposed Plan should not be amended to safeguard potential Fastlink routes. It may be that when there is greater certainty, such routes could be included in future Plans.

#### A cycle path on Dumbarton Road

16. The representation seeks a new cycle path on Dumbarton Road. For the reasons set out above, the council is seeking to safeguard a new segregated cycle route along the river, subject to the outcome of NWGTS. The council also considers that with car parking spaces on either side of Dumbarton Road, there is limited physical space to provide a dedicated cycle lane.

17. Having visited the area, I agree that there appears to be little scope to provide a dedicated cycle path on Dumbarton Road. Although the existing cycle way would be removed if Fastlink proceeds on the current proposed route, a segregated cycle way is proposed along the river bank. The wider issue of cycle ways will be addressed in the NWGTS. There is no modification to the Plan.

#### Support for Fastlink

18. The representations supporting the proposal are noted and there are no modifications to the Proposed Plan arising from them.

#### **Reporter's recommendations:**

Modify bullet point 2 of Policy CDP11 to read:

*“land required for Fastlink, Robroyston Station and road schemes, as shown on Figure 19 (land for Fastlink and the North Clydeside Development Route to be safeguarded pending*



*the outcomes of a study into traffic and transportation issues, and associated matters including residential amenity, road safety and the Green Network, in the North West of the City)”*

Modify the fifth paragraph of the context to policy CDP11 by adding a new sentence, after the fifth sentence, to read:

*‘On the north bank, it is proposed that the route will utilise a former rail formation, currently used as part of the National Cycle Network. A segregated walking and cycling route, on this alignment, will require to be provided as part of the Fastlink proposal.’*

Issue 51	Transport Proposal T007 - North Clydeside Development Route	
Development plan reference:	Policy CDP 11 Sustainable Transport (Pages 56-58) Policy and Proposals Map	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
Carol Rafferty (00024) Margaret Kay (00150) Sarah King (00151) Heather Dickson (00152) John Dickson (00153) Hilda Dickson (00154) Andrew Fraser (00392) Archie Thornton (00425)		David Donnelly (00432) Lewis P Reilly (00445) Rhona Reilly (00468) Andrew McIntyre (00523) Neil Clark (00529) B M O'Hanlon (00547) Stuart Low (00549) Dr Paul Welsh (00626)
Provision of the development plan to which the issue relates:	The promotion of a new road, the North Clydeside Development Route, in policy CDP11 – Sustainable Transport and on the Policy and Proposals Map.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00024/1/001, 00150/1/001, 00151/1/001, 00152/1/001, 00392/1/001, 00154/1/001, 00425/1/001, 00432/1/001, 00445/1/001, 00468/1/001, 00523/1/001, 00529/1/001, 00547/1/001, 00549/1/001 - Objection to the inclusion of T007 on the Policy and Proposals map because of increased noise, air and light pollution and impact on health.  00024/1/002, 00150/1/002, 00151/1/002, 00152/1/002, 00153/1/001, 00154/1/002, 00392/1/004, 00425/1/002, 00432/1/002, 00445/1/002, 00468/1/002, 00523/1/002, 00529/1/002, 00547/1/002, 00626/1/001 - Objection to the inclusion of T007 on the Policy and Proposals map because of the route and the impact on former railway track, including on the natural environment and open space.  00024/1/003, 00151/1/003, 00425/1/003, 00432/1/003, 00445/1/003, 00547/1/004 - Objection to the inclusion of T007 on the Policy and Proposals map because of the impact on amenity and quality of life.  00024/1/004, 00150/1/004, 00151/1/004, 00152/1/003, 00153/1/002, 00154/1/003, 00425/1/004, 00432/1/004, 00547/1/005 - Objection to the inclusion of T007 on the Policy and Proposals map because there is no need for it and it is a waste of money. 00150/1/003, 00154/1/006, 00547/1/003, 00626/1/002 - Objection to the inclusion of T007 on the Policy and Proposals map because result it would result in increased road safety risks.  00150/1/005, 00151/1/006, 00153/1/003, 00154/1/005, 00626/1/004 - Objection to the inclusion of T007 on the Policy and Proposals map because there has been a lack of notification/consultation with local residents on these plans and a lack of information.		

00151/1/005, 00152/1/004, 00154/1/004, 00425/1/005, 00432/1/006, 00468/1/003, 00523/1/003, 00529/1/003, 00547/1/006, 00626/1/003 - Objection to the inclusion of T007 on the Policy and Proposals map because a new road would have a negative impact on property values.

00432/1/005 - Objection to the inclusion of T007 on the Policy and Proposals map because the road is being imposed on Yoker because it is a poorer district - the road is for the convenience of so few but would result in dis-amenity for so many.

00523/1/004, 00547/1/008 - Objection to the inclusion of T007 on the Policy and Proposals map because of its impact on privacy and security.

00547/1/007 - Should the application be approved, I hope the council will consider using its powers to enforce controlled hours of operation and other restrictions that might make the duration of the works more bearable. The proposed route is restricted and contained so I ask that consideration be made about how and where construction vehicles and staff would gain access to the site for unloading and parking without causing a highway hazard or inconveniencing neighbours.

00626/1/005 - Objection to the inclusion of T007 on the Policy and Proposals map because the Council has been nothing but difficult in achieving completion of the Ellerslie Road estate following the builders going into administration but now feels at liberty to use the estate's roads as their own and to build through it as they see fit.

#### **Modifications sought by those submitting representations:**

00024/1/001, 00024/1/002, 00024/1/003, 00024/1/004, 00150/1/001, 00150/1/002, 00150/1/003, 00150/1/004, 00150/1/005, 00151/1/001, 00151/1/002, 00151/1/003, 00151/1/004, 00151/1/005, 00151/1/006, 00152/1/001, 00152/1/004, 00152/1/002, 00152/1/003, 00153/1/001, 00153/1/002, 00153/1/003, 00154/1/001, 00154/1/002, 00154/1/003, 00154/1/004, 00154/1/005, 00154/1/006, 00392/1/001, 00392/1/004, 00425/1/001, 00425/1/002, 00425/1/003, 00425/1/004, 00425/1/005, 00432/1/004, 00432/1/005, 00432/1/001, 00432/1/002, 00432/1/003, 00432/1/006, 00445/1/001, 00445/1/002, 00445/1/003, 00468/1/002, 00468/1/001, 00468/1/003, 00523/1/003, 00523/1/001, 00523/1/002, 00523/1/004, 00529/1/001, 00529/1/003, 00529/1/002, 00547/1/004, 00547/1/001, 00547/1/002, 00547/1/003, 00547/1/005, 00547/1/006, 00547/1/008, 00549/1/001, 00626/1/001, 00626/1/002, 00626/1/003, 00626/1/004, 00626/1/005 - Remove proposal T007 from the City Development Plan.

00547/1/007 - Remove proposal T007 from the City Development Plan but, should the road go ahead, the council should use its powers to ensure the duration of the works is more bearable.

#### **Summary of responses (including reasons) by planning authority:**

##### Objecting

##### Background

The North Clydeside Development Route (NCDR) is a proposal to develop a new road from Glasgow Harbour to the City boundary. The NCDR is a long-standing scheme, previously known as the Yoker Relief Road, and is supported in City Plan 2 (CE17, policy

TRANS 1). It is intended to:

- help serve, and facilitate, the major development areas on the north bank of the Clyde;
- take strategic traffic off Dumbarton Road and provide environmental/amenity benefits to residents of Whiteinch, Scotstoun and Yoker; and
- help accommodate the westward extension of Fastlink into West Dunbartonshire.

The route would involve upgrading South Street from Sawmill Road (at Thornwood Roundabout) to its western terminus at Burnham Road. From there, it would make use of the former rail formation, which runs parallel with (and to the south of) Dumbarton Road as far as Ellerslie Road (OC97).

The rail formation had previously continued westwards to Dock Street but, in March 2005, full planning permission (04/01740/DC) was granted to develop the residential proposal at Ellerslie Road/Ellerslie Path/Ellerslie Crescent (OC98). As part of the process of determining the application, a Transport Assessment was carried out, and the layout was amended to ensure that the route of the NCDR (or Yoker Relief Road, at the time), as shown on City Plan 2 Proposals Map, was protected. The Committee Report on application 04/01740/DC noted that, 'in the event that the Yoker Relief Road is implemented, the street and car parking layout would be amended correspondingly' (OC98, page 4).

This would have the effect of removing some car parking and landscaping on the north side of Ellerslie Road, to provide for road space. The route would utilise this land and then utilise the former rail formation again (along part of which National Cycle Network Route 7 runs) to allow the route to meet with the A814 at Dock Street, just over the Local Authority Boundary in West Dunbartonshire Council.

The road had been proposed for inclusion as a City Deal proposal, but the detailed modelling of the possible interventions identified other proposals anticipated to deliver greater Gross Value Added. As a result, the road is not included in this phase of City Deal, although there is scope for it to be included in a future phase.

Renfrewshire Council has brought forward Plans, through City Deal, for the development of a new road bridge across the Clyde, on the line of the Renfrew/Yoker Ferry. This bridge, should it be developed, would likely result in a marked change in traffic movements in the north west of the City. As a result, the Council is keen to undertake a holistic examination of potential traffic and transport issues in this part of the City, including Fastlink and the NCDR. This study (the North West Glasgow Transport Study) would offer scope to examine whether there remains a need for the scheme and, if so, its design and route alignment, and would provide opportunities to investigate whether the issues raised in the following objections could be satisfactorily addressed.

00024/1/001, 00150/1/001, 00151/1/001, 00152/1/001, 00154/1/001, 00392/1/001, 00425/1/001, 00432/1/001, 00445/1/001, 00468/1/001, 00523/1/001, 00529/1/001, 00547/1/001, 00549/1/001

In developing a new road, one of the key aims would be to take strategic traffic off Dumbarton Road and provide environmental/amenity benefits for residents of Whiteinch, Scotstoun and Yoker, where traffic levels on Dumbarton Road would be lessened. The new road, over much of its length, would be on the line of an existing road, South Street,

which is currently intensively used, including by heavy goods vehicles. As a result, it is considered that, in the area around the eastern end of the route, there is potential to deliver a net environmental benefit for the majority of residents.

It is recognised that this would not, necessarily, be the case in the area around the western end of the route, particularly where Dumbarton Road and the NCDR would run parallel, and very close, to each other. There could well be net environmental dis-benefits for residents of homes fronting Dumbarton Road, particularly those blocks between Burnham Road and Esk Street; and Bulldale Street and Yoker Ferry Road, but also those further west, around Greenlaw Road. In addition, residents of Ellerslie Road would have a major road travelling through their currently quiet estate.

Whilst preliminary plans were drawn up for the development of the route in 2007, the proposed North West Glasgow Transport Study would offer scope to re-examine the design and route alignment of the scheme, should it still be required, and would also provide an opportunity to assess, and address, potential impacts on noise, air and light pollution.

It would be beneficial for the Plan to reflect this changed context and to provide clarity on how it should be addressed.

The Reporter could, if so minded, amend bullet point 2 of Policy CDP11 to read: 'land required for Fastlink, Robroyston Station and road schemes, as shown on Figure 19 (land for Fastlink and the North Clydeside Development Route to be safeguarded pending the outcomes of a study into traffic and transportation issues, and associated matters, in the North West of the City').

00024/1/002, 00150/1/002, 00151/1/002, 00152/1/002, 00153/1/001, 00154/1/002, 00392/1/004, 00425/1/002, 00432/1/002, 00445/1/002, 00468/1/002, 00523/1/002, 00529/1/002, 00547/1/002, 00626/1/001 - The road would result in the development of the former rail formation over two stretches – from the western terminus of South Street to a point just west of Yoker Ferry Road and from a point to the west of the landscaped area at Ellerslie Road to the City boundary. Both stretches are shown as Green Corridor in City Plan 2 and are protected through City Plan 2 policy ENV 7 (CE17) and policies CDP 6 and 7 of the Proposed Plan. Whilst there would be scope for some landscaping along the route of the new road, this wouldn't replicate the existing green corridor in terms of its habitat, cohesiveness or the amenity it provides, and it is accepted that there would be a detrimental impact on the Green Network in this part of the City.

The proposed North West Glasgow Transport Study would offer scope to investigate how best to mitigate the loss of the Green Corridor functions, including open space, should the route still be required.

It would be beneficial for the Plan to reflect this changed context and to provide clarity on how it should be addressed.

The Reporter could, if so minded, amend bullet point 2 of Policy CDP11 to read: 'land required for Fastlink, Robroyston Station and road schemes, as shown on Figure 19 (land for Fastlink and the North Clydeside Development Route to be safeguarded pending the outcomes of a study into traffic and transportation issues, and associated matters, in the North West of the City').

00024/1/003, 00151/1/003, 00425/1/003, 00432/1/003, 00445/1/003, 00547/1/004

In developing a new road, one of the key aims would be to take strategic traffic off Dumbarton Road and provide environmental/amenity benefits for residents of Whiteinch, Scotstoun and Yoker, where traffic levels on Dumbarton Road would be lessened. The new road, over much of its length, would be on the line of an existing road, South Street, which is currently intensively used, including by heavy goods vehicles. As a result, it is considered that, in the area around the eastern end of the route, there is potential to deliver a net environmental benefit for the majority of residents.

It is recognised that this would not, necessarily, be the case in the area around the western end of the route, particularly where Dumbarton Road and the NCDR would run parallel, and very close, to each other. There could well be net environmental dis-benefits for residents of homes fronting Dumbarton Road, particularly those blocks between Burnham Road and Esk Street; and Bulldale Street and Yoker Ferry Road, but also those further west, around Greenlaw Road. In addition, at Ellerslie Road, a busy road would pass through a, currently quiet, residential area.

Whilst preliminary plans were drawn up for the development of the route in 2007, the proposed North West Glasgow Transport Study would offer scope to examine the design and route alignment of the scheme, should it still be required, and would also provide opportunities for addressing potential impacts on amenity, including on pollution and open space.

It would be beneficial for the Plan to reflect this changed context and to provide clarity on how it should be addressed.

The Reporter could, if so minded, amend bullet point 2 of Policy CDP11 to read: 'land required for Fastlink, Robroyston Station and road schemes, as shown on Figure 19 (land for Fastlink and the North Clydeside Development Route to be safeguarded pending the outcomes of a study into traffic and transportation issues, and associated matters, in the North West of the City').

00024/1/004, 00150/1/004, 00151/1/004, 00152/1/003, 00153/1/002, 00154/1/003, 00425/1/004, 00432/1/004, 00547/1/005

In developing a new road, one of the key aims would be to take strategic traffic off Dumbarton Road and provide environmental/amenity benefits for residents of Whiteinch, Scotstoun and Yoker, where traffic levels on Dumbarton Road would be lessened. A new road would be likely to have benefits for particular localities along much of its route.

The proposed North West Glasgow Transport Study will offer scope to examine the need for the scheme and, its design and route alignment and the costs and benefits of delivering a new road. This would allow a decision to be taken in the light of all the relevant information.

It would be beneficial for the Plan to reflect this changed context and to provide clarity on how it should be addressed.

The Reporter could, if so minded, amend bullet point 2 of Policy CDP11 to read: 'land required for Fastlink, Robroyston Station and road schemes, as shown on Figure 19 (land for Fastlink and the North Clydeside Development Route to be safeguarded pending the

outcomes of a study into traffic and transportation issues, and associated matters, in the North West of the City’).

00150/1/003, 00154/1/006, 00547/1/003, 00626/1/002 - In developing a new road, one of the key aims would be to take strategic traffic off Dumbarton Road and provide environmental/amenity benefits for residents of Whiteinch, Scotstoun and Yoker, where traffic levels on Dumbarton Road would be lessened. As Dumbarton Road is the principal focus of pedestrian activity in the area, it is considered that a new road could deliver net road safety benefits over its length. However, it is recognised that the proposed route alignment could have considerable road safety implications on some parts of the route, including at Ellerslie Road.

The proposed North West Glasgow Transport Study will offer scope to examine the need for the scheme and its design and route alignment, together with associated road safety implications. This would allow a decision to be taken in the light of all the relevant information.

It would be beneficial for the Plan to reflect this changed context and to provide clarity on how it should be addressed.

The Reporter could, if so minded, amend bullet point 2 of Policy CDP11 to read: ‘land required for Fastlink, Robroyston Station and road schemes, as shown on Figure 19 (land for Fastlink and the North Clydeside Development Route to be safeguarded pending the outcomes of a study into traffic and transportation issues, and associated matters, in the North West of the City’).

00150/1/005, 00151/1/006, 00153/1/003, 00154/1/005, 00626/1/004 - The North Clydeside Development Route is a long-standing scheme, previously known as the Yoker Relief Road. In line with planning legislation, it was identified in the LDP Main Issues Report as a major road proposal (CE8, Issue 4.4, Map 12 and on Map 1: The Spatial Regeneration Framework). The route alignment for the Road is safeguarded in City Plan 2 (CE17, policy TRANS 1).

As the road is a proposal in the Proposed Plan, owners, lessees or occupiers of land within 20 metres of the road were notified at the start of the Proposed Plan representation period (1 May 2014). The addresses which were neighbour notified were generated automatically by the Council’s Geographic Information Systems datasets. 501 notification letters were issued in connection with this proposal. When it became clear that the addresses generated had not resulted in all owners, lessees or occupiers of land within 20 metres of the road being notified, a further, detailed manual check was undertaken, leading to a further notification, to ensure the terms of the legislation were met. This resulted in a further 204 notification letters being issued in connection with this proposal. This took place in September 2014 and a further 6 weeks was made available during which representations on the road would be accepted.

The Council considers it has met the terms of the legislation, as regards the notification of the owners, lessees or occupiers of land within 20 metres of the road alignment.

No modifications recommended in relation to these objections.

00151/1/005, 00152/1/004, 00154/1/004, 00425/1/005, 00432/1/006, 00468/1/003, 00523/1/003, 00529/1/003, 00547/1/006, 00626/1/003 - Impact on property values is not

a material planning consideration.

No modifications recommended in relation to these objections.

00432/1/005 - In developing a new road, one of the key aims would be to take strategic traffic off Dumbarton Road and provide environmental/amenity benefits for residents of Whiteinch, Scotstoun and Yoker, where traffic levels on Dumbarton Road would be lessened. It is anticipated that, over much of its length, the new road would help deliver an enhanced environment and improved amenity. It is recognised that this would not, necessarily, be the case along the full length of the road, and that there could well be net environmental dis-benefits for residents in the western part of the route. The justification for the road is one that requires to be considered along its full length.

These potential benefits and dis-benefits also need to be considered in the context of the plans for a new bridge. Should it be developed, it would likely result in a marked change in traffic movements in the north west of the City, which could also give rise to dis-benefits. The proposed North West Glasgow Transport Study would provide an opportunity to examine the likely benefits and dis-benefits for people in the wider area. This would allow a decision to be taken in the light of all the relevant information.

It would be beneficial for the Plan to reflect this changed context and to provide clarity on how it should be addressed.

The Reporter could, if so minded, amend bullet point 2 of Policy CDP11 to read: 'land required for Fastlink, Robroyston Station and road schemes, as shown on Figure 19 (land for Fastlink and the North Clydeside Development Route to be safeguarded pending the outcomes of a study into traffic and transportation issues, and associated matters, in the North West of the City'.

00523/1/004, 00547/1/008 – The road would result in the development of the former rail formation, west of the western terminus of South Street. This could result in the back garden areas of the flats between Burnham Road and Esk Street; and Bulldale Street and Yoker Ferry Road being more accessible and visible from a public road. However, the existing rail formation can also give rise to problems of security and privacy, associated with a lack of street-level surveillance of the route and with the elevated view it provides of residents' back gardens. At this stage, it is by no means clear that the proposal would have a negative impact on either security or privacy.

The proposed North West Glasgow Transport Study would provide opportunities to investigate how good design could address concerns over security and privacy, should the road still be required.

It would be beneficial for the Plan to reflect this changed context and to provide clarity on how it should be addressed.

The Reporter could, if so minded, amend bullet point 2 of Policy CDP11 to read: 'land required for Fastlink, Robroyston Station and road schemes, as shown on Figure 19 (land for Fastlink and the North Clydeside Development Route to be safeguarded pending the outcomes of a study into traffic and transportation issues, and associated matters, in the North West of the City'.

00626/1/005 - It is understood that the developers of the Ellerslie Road Estate went into



administration before the planning consent was fully implemented. Whilst it is recognised that this has not been an ideal situation, and may have caused dis-amenity to residents, it is a separate issue from whether or not the road should be included as a proposal in the Local Development Plan on its proposed alignment.

No modifications recommended in relation to this objection.

00547/1/007 – These are detailed matters that would be addressed, as a matter of course, during the consideration of any development application for the road which may be forthcoming, and would be subject to appropriate conditions. It is considered that these are not matters which need to be set out in the Local Development Plan.

No modifications recommended in relation to this objection.

### **Reporter's conclusions:**

#### Context

1. This issue relates to the proposed North Clydeside Development Route (NCDR), which is a relief road proposed to serve the development areas on the north bank of the Clyde, to take traffic off Dumbarton Road and to facilitate the westward extension of Fastlink to West Dunbartonshire (Issue 50).
2. The road has been identified in City Plan 2, and the current proposed route would upgrade South Street to Burnham Road, then continue on the existing former rail formation, which runs parallel with Dumbarton Road. The road would then run through the Ellerslie estate, until it meets the A814 at Dock Street which is in West Dunbartonshire.
3. The NCDR is not included in the current City Deal agreement for funding, but may be included in a future phase.
4. Included in City Deal is a proposal by Renfrewshire Council for a new bridge across the Clyde, which would link the south and north banks. Should this bridge proceed, then it is likely that traffic movement in the Yoker/Clydebank and wider areas would experience a change in volume. The council says that it wishes to undertake a study to look at all the proposed transport proposals in the north west of the City, to evaluate how they might impact on demand for new infrastructure and on current transport proposals such as the NCDR and Fastlink. The study will be called the North West Glasgow Transport Study (NWGTS). Following that study, and subject to the provision of other transport proposals, should the NCDR still be required, the proposed route and alignment of the road would need to be determined.

#### Residential Amenity

5. A large number of representations relate to the potential impact the NCDR may have on existing residential properties that are adjacent to the proposed route as currently set out in the Proposed Plan, and the potential impact on road safety on routes in the area. From my site visit, I conclude that the proposed route may have the potential to have a detrimental impact on residential amenity in terms of noise, visual impact, volume of traffic, potential increases in emissions, loss of open space, amongst other matters. I also note from my site visit that it could be the western end of the proposed route that

may experience such impacts, particularly where the proposed NCDR runs parallel with Dumbarton Road and where it would run through the Ellerslie estate. The potential impact in road safety may arise for users of the adjoining streets, especially cyclists and pedestrians who may experience a disbenefit from the loss of the dedicated existing route.

6. However, the extent of these potential impacts appears to be undetermined at this point in time, and the council says that the proposed NWGTS would investigate such potential impacts. The council has suggested amended text to address the NWGTS, to be included in bullet point 2 of Policy CDP11. I am making a further modification to that suggested amendment by including a specific modification recommending the inclusion of an assessment of potential impact on residential amenity and road safety as part of the NWGTS, as set out below. This modification should address the concerns of those who made representations relating to amenity, quality of life, privacy, security, noise, construction management and road safety.

#### Need for the NCDR

7. Representations have questioned the need for a new road in this location, the capacity of Dumbarton Road and the bus routes, and the loss of the dedicated cycle and pedestrian route. The capacity issues are considered to arise at peak times only, and Dumbarton Road functions well as the main route for bus and traffic movement.

8. The council says that NCDR is not included in the current City Deal agreement for funding, but may be included in a future phase. Included in City Deal is a proposal by Renfrewshire Council for a new bridge across the Clyde, which would link the south and north banks of the river. Should this bridge proceed, then it is likely that traffic movement in the Yoker/Clydebank and wider North West Glasgow area would experience a change in volume. The Council say that they wish to undertake a study to look at all the proposed transport proposals in the north west of the City, to evaluate how they might impact on demand for new infrastructure and on current transport proposals such as the NCDR and Fastlink. The study will be called the North West Glasgow Transport Study (NWGTS). Following that study, and subject to the provision of other transport proposals, should the NCDR still be required, the proposed route and alignment of the road would need to be determined. In the Proposed Plan, the council is seeking to safeguard the proposed route of the NCDR, pending the outcome of the study.

9. I find that until the NWGTS is complete, the safeguarded route of the NCDR should not be removed from the Proposed Plan. As the outcome of that study is unknown, and until the need for the route is shown to be met elsewhere, it is reasonable to safeguard the route of the NCDR. There will be no modification to the Proposed Plan.

#### Green Network

10. At present, the former rail formation which is proposed to incorporate part of the NCDR is a green corridor, providing habitat for wildlife and a valuable local amenity space. Representations object to the loss of the dedicated space.

11. The council advises that while the proposed NCDR route would provide for some landscaping, it accepts that there will a detrimental impact on the Green Network in this part of Glasgow.

12. I conclude that the NWGTS should evaluate the extent of any impact, and set out mitigation measures to demonstrate how such impacts can be managed. The council has suggested amended text to address the NWGTS, to be included in bullet point 2 of Policy CDP11, and I am adding a specific modification recommending the inclusion of an assessment of potential impact on landscape, habitats and the Green Network, as part of the NWGTS, as set out below.

#### Consultation

13. Representations have objected to the consultation process as carried out by the council, and the council acknowledges that an error was made in the initial consultation process, where some addresses were not notified of the Proposed Plan. In order to rectify the error, an additional consultation period of 6 weeks was set in September 2014, and an additional 204 letters of notification sent.

14. I find that although an error had been made, the council appears to have acted in an appropriate manner to address the implications of the error, and no party appears to have been disadvantaged. The terms of the legislation and guidance have been met. There is no modification to the Proposed Plan.

#### **Reporter's recommendations:**

Modify bullet point 2 of Policy CDP11 to read:

*“land required for Fastlink, Robroyston Station and road schemes, as shown on Figure 19 (land for Fastlink and the North Clydeside Development Route to be safeguarded pending the outcomes of a study into traffic and transportation issues, and associated matters including residential amenity, road safety and the Green Network, in the North West of the City)”*

Issue 52	Transport Proposal T006 Blackhill Road Upgrade	
Development plan reference:	Policy CDP 11 Sustainable Transport (Pages 56-58) Policy and Proposals Map	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
Paul Le Poidevin (00384)		
Provision of the development plan to which the issue relates:	The promotion of an upgrade of Blackhill Road, Summerston, in policy CDP 11 - Sustainable Transport and on the Policy and Proposals Map.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00384/2/001 Paul Le Poidevin - Remove Proposal T006 (Blackhill Road upgrade) from the City Development Plan. The upgrade of the road would irrevocably alter the semi-rural nature of the area, including the Antonine Wall World Heritage site and would damage flora and fauna, and potentially exacerbate existing groundwater/flooding issues. Additional housing stock would make an already congested road worse and have an environmental impact as travel by foot is not possible due to a lack of sufficient pavement and frequent flooding outside the cemetery.		
Modifications sought by those submitting representations:		
00384/2/001 Paul Le Poidevin - Remove Proposal T006 (Blackhill Road upgrade) from the City Development Plan.		
Summary of responses (including reasons) by planning authority:		
<u>Objecting</u>  00384/2/001 Paul Le Poidevin - Blackhill Road runs west, from Balmore Road, north of the city's urban edge, before turning south to meet Invershiel Road, in the residential area of Summerston, at a T-junction. With the exception of the south western section of the road, upgraded through the City Plan 1 greenfield housing release, it is a country road. Despite being fairly straight over much of its length, blind summits, and a narrow carriageway lined by hedgerows, have given rise to safety concerns. There are no pavements, apart from on the upgraded south-western section, and no provision for cyclists.  Policy CDP10 proposes a feasibility study to examine environmental, hydrological and infrastructure issues in the Green Belt to the north of Summerston, to assess the potential for Green Belt housing release in the area to the west of Balmore Road. This recognises that, should development in this area be acceptable in principle, then an upgrade of Blackhill Road, potentially including an upgrade of its junction with Balmore Road, would likely be necessary. The feasibility study will have to examine, amongst other things,		

whether the scale of any development likely to be acceptable in this area would help deliver the necessary improvements to Blackhill and Balmore Roads, or provide an alternative, that would make the new development acceptable in terms of its traffic impact. If the feasibility study showed that the impact of the new development was not likely to be acceptable in traffic and transport terms, then the development would be unlikely to go ahead.

The study would require to consider potential impact on the Frontiers of the Roman Empire World Heritage Site Buffer Zone and other environmental considerations.

No modifications recommended.

### **Reporter's conclusions:**

1. The representation seeks the removal of Transport Proposal T006 (Blackhill Road Upgrade) from the Plan, on the basis that the potential additional housing on the Summerston site will exacerbate an existing problem in terms of road capacity, and that the road would have an unacceptable environmental impact in terms of altering the semi-rural nature of the local area and increasing the potential for flooding.

2. As discussed in Issue 17, the council has stated at Policy CDP10 Meeting Housing Needs, that there are insufficient effective brownfield sites and that greenfield locations are required to meet the shortfall in housing land supply. This includes those sites identified as opportunities in the green belt review, including Summerston. The council has been unable to identify sufficient effective brownfield sites to meet the housing requirement for the Proposed Plan period. It also cannot demonstrate that it will have a rolling five year housing land supply in line with Scottish Planning Policy. This change in circumstances is the reason why the "cornerstone" policy of City Plan 2 of opposing the use of greenfield land has been amended.

3. A feasibility study is proposed at Policy CDP10 to determine the potential impact of the green belt housing release at Summerston, including but not limited to environmental, hydrological and infrastructure issues. The council recognises that, should development in this area be acceptable in principle, it is likely that an upgrade of Blackhill Road, potentially including an upgrade of its junction with Balmore Road, would be necessary. The feasibility study will have to examine, amongst other things, whether the scale of any development likely to be acceptable in this area would help deliver the necessary improvements to Blackhill and Balmore Roads, or provide an alternative, that would make the new development acceptable in terms of its traffic impact. If the feasibility study showed that the impact of the new development was not likely to be acceptable in traffic and transport terms, then the development would be unlikely to go ahead.

4. The council has advised that the capacity of the road network would be considered as part of the feasibility study. It adds that the timing of road improvements will be a matter for consideration between the council and developer. However, local residents clearly have concerns about the condition and use of Blackhill Road. I find that the feasibility study should make clear how any proposed additional housing development and required improvements to Blackhill Road are to be timed and phased, having regard to convenience for existing residents and highway safety.

5. I conclude that in order to address the concerns raised in representation about T006, at Issue 17, the text of the bullet point relating to Summerston in Policy CDP10 should be

amended to reflect the phasing and delivery of infrastructure including roads. However, there is no modification to Policy CDP11 or to the Policy and Proposals Map.

**Reporter's recommendations:**

No modifications.

Issue 53	Delivering Development	
Development plan reference:	Policy CDP12 Delivering Development	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
Hillhead Community Council (00479) Persimmon Homes (00497) Homes for Scotland (00602) Glasgow Harbour Ltd (00610) Scottish Government (00621) Strathclyde Partnership for Transport (00633) George Capital LLP (00636) Dowanhill Hyndland and Kelvinside Community Council (00637)		
Provision of the development plan to which the issue relates:	Policy CDP 12 - Delivering Development is one of ten detailed policies in the Plan which contributes in part to meeting the requirement of the two overarching policies. Policy CDP 12 seeks to ensure that development contributes to a sustainable, economically successful City through the provision of reasonable infrastructure and facilities that are necessary to mitigate the impact of change on Glasgow's resources and that are appropriate to both the nature of the development and its location.	
Planning authority's summary of the representation(s):		
<u>Policy Wording</u>		
<u>Objecting</u>		
00479/8/001 Hillhead Community Council - It is difficult to approve of CDP12 when the detail of how it is to be used is missing. Without seeing the detail we cannot tell whether a development application will override this concern		
00479/8/002 Hillhead Community Council - Objects to the use of the term "mitigation" in CDP 12. This is too permissively general and subjective and will be subject to abuse. It appears to be opening the way to granting applications which are unacceptable.		
00479/8/003 Hillhead Community Council - Objects to the use of the term "meeting obligations through financial payments" in CDP12. In too many cases the financial payment is a fine/excuse for failing to provide the stipulated and necessary amenities. The result in this area has been to deprive residents of necessary amenities.		
00479/8/004 Hillhead Community Council - The design of infill buildings and recognition of context are as important as cumulative impact. They can rapidly ruin a conservation area or a street with a row of well-designed or cohesive buildings. This should be specifically addressed.		
00497/12/001 Persimmon Homes, 00602/4/001 Homes for Scotland - The policy should state that assessments of infrastructure/facilities deficiencies will be carried out either by		

the developer or jointly with the Council and/or other agencies. There should be a reference in the Policy to further detail on facilities and infrastructure being available in the Action Plan. This policy is inadequate in terms of giving developers clarity as to what may be expected of them. The policy should be clear about the need for any contributions to meet the five tests of Circular 3/2012. It should be clear about the mechanisms for securing contributions- preferably planning conditions in line with the Circular. It should also set out any circumstances where contributions may be waived or reduced- for instance, project viability or abnormal development costs.

00610/1/001 Glasgow Harbour Ltd - It is accepted that contributions to facilities and infrastructure are acceptable, provided that this is reasonable and directly related to the development. Contributions towards infrastructure projects should be set out in the Council's programme, with the implementation of the projects time limited to five years, as indefinite timescales can result in developments becoming unviable and in permanent sterilisation. Impact on brownfield development can lead to greater pressure for development in the green belt.

Given the prevailing economic circumstances, specific reference should be made to the impact of developer contributions on the viability of development.

The detail of any obligations should be included in The Plan, rather than Supplementary Guidance, and therefore be subject to Examination.

00621/5/001 Scottish Government - Policy CDP 12 does not provide clarity on the types of development which contributions may be sought from; for example, whether all development or whether only certain types of development (ie. Housing, business, industry, retail or leisure). In addition, it does not provide clarity on the location of developments which may be subject to contributions, for example, whether only development within certain areas will be subject to contributions.

Paragraph 3 of Policy CDP 12 states that 'individual assessments will be required to identify the impacts arising from development and the mitigation required in the following areas identified in the Plan, or in locations considered to be acceptable in principle.' Within the identified areas there is insufficient detail in relation to the specific items which developer contributions shall be sought for. Once the above detail has been established, the exact levels of developer contributions and methodologies for their calculation should be set out in Supplementary Guidance, as per Circular 6/2013

00636/14/001 George Capital LLP - The overarching policy CDP12 should reflect the fact that the Council should not be seeking payments for infrastructure which do not meet the tests of the Circular on Planning Obligations and that are so punitive that they make developments unviable.

#### Open Space/Community Facilities

00602/6/001 Homes for Scotland - Policy CDP12 is unreasonable as it gives no detail as to what type(s) of community facilities might be needed. The Council is surely in the best place to know about education provision issues, public facilities such as sports, community centres, libraries and so on. Development Plans should contain an Action Plan which should set out what is required to deliver the Plan. That Action Plan should identify facilities to be provided and the providers/funders. To leave all of that detail to developers is inappropriate.



Public Transport Provision

00633/19/001 Strathclyde Partnership for Transport - Page 59 - Aims

Additional or extended bus routes are often required to improve accessibility to public transport services for new development that is outwith the acceptable walking distance from existing services. The commercial nature of the bus market means that a financial contribution is likely to be required in the short to medium term to support the introduction of such services. This should be reflected in the wording of the aims of the policy. This would also reflect CDP 11.

00633/19/002 Strathclyde Partnership for Transport - Page 60 - Policy

To ensure the policy is clear that the scope of public transport needs includes infrastructure, facilities and services where appropriate and necessary.

00633/19/003 Strathclyde Partnership for Transport - Page 60 - Policy

It is suggested that the policy wording be amended in order to reflect aspirations to rollout the Fastlink standard on quality bus corridors after the completion of the core route.

Supporting

00637/22/001 Dowanhill Hyndland and Kelvinside Community Council - Require the delivery of development to be carried out efficiently.

**Modifications sought by those submitting representations:**

Policy Wording

00479/8/001 Hillhead Community Council - The Plan should include further detail of how policy CDP12 it is to be used.

00479/8/002 Hillhead Community Council - Policy CDP 12 should be amended to delete reference to mitigation being a means of offsetting proposals which may not, otherwise, be acceptable.

00479/8/003 Hillhead Community Council - Policy CDP 12 should not indicate that meeting obligations through financial payments is acceptable as a means of avoiding the provision of amenities which would otherwise be required.

00479/8/004 Hillhead Community Council - The Plan should make reference to the design of infill buildings and a recognition of context as being as important as cumulative impact.

00497/12/001 Persimmon Homes, 00602/4/001 Homes for Scotland - Delete first two paragraphs of CDP12 and rewrite policy to include: "Developer contributions, where required, will be sought through planning conditions or, where this is not feasible, planning or other legal agreements, when the tests of Circular 3/2012 are met. Contributions may be reduced or waived where a developer can demonstrate that there are abnormal development costs or overall viability issues which render the contribution impractical."

00610/1/001 Glasgow Harbour Ltd - Seeks the inclusion of the following wording regarding viability in Policy CDP 12 of The Plan and in all related Supplementary Guidance: "It will be for the developer to demonstrate to the Council's satisfaction that developer contribution requirements, level of infrastructure, land reservations, facilities provided, abnormal development costs and / or the prevailing economic circumstances will render the development unviable. These should be set out through a Development Viability Statement. The terms of the Development Viability Statement will be taken into account as a material consideration in determining the planning application. Depending on the information submitted, the Council can agree to reduce, stagger or even waive the requirement for the provision / contribution with a view to ensuring the development remains viable. Contributions should be based upon impacts and needs of the specific development for that infrastructure with a clear Council programme for provision of the infrastructure required and undertaken in no more than 5 years."

00621/5/001 Scottish Government - Policy CDP 12 should be amended to provide more clarity and detail in relation to the locations and types of development from which developer contributions will be sought and the items which the developer contributions will be sought for.

00636/14/001 George Capital - Policy CDP12 should state that the Council will work with the development industry to ensure that planning obligations are not so onerous that they make developments unviable whilst they will ensure that the necessary infrastructure to enable development is delivered.

#### Open Space/Community Facilities

00602/6/001 Homes for Scotland - Policy CDP12 to be amended in the City Development Plan to include an action plan detailing the Council's requirements for the provision of community facilities.

#### Public Transport Provision

00633/19/001 Strathclyde Partnership for Transport - Page 59 - Aims

Suggested change to first paragraph beginning 'This policy ...' to read: "This policy aims to ensure that development contributes to a sustainable, economically successful City, through the provision of reasonable infrastructure, services and facilities that are necessary to mitigate the impact of change on Glasgow's resources, and that are appropriate to both the nature of the development and its location."

00633/19/002 Strathclyde Partnership for Transport - Page 60 - Policy

Suggested change to third bullet point beginning 'transport needs ...' to read: "transport needs (including active travel solutions and public transport infrastructure, facilities and services where appropriate and necessary)."

00633/19/003 Strathclyde Partnership for Transport - Page 60 – Policy

Suggested change to final bullet point beginning 'Fastlink Core Route ...' to read: Fastlink Core Route, Fastlink Proposed Route and the rollout of the Fastlink standard on quality bus corridors."

**Summary of responses (including reasons) by planning authority:**Policy WordingObjecting

00479/8/001 Hillhead Community Council, 00497/12/001 Persimmon Homes, 00602/4/001 Homes for Scotland, 00610/1/001 Glasgow Harbour Ltd, 00621/5/001 Scottish Government, 00636/14/001 George Capital LLP - It is accepted that there is insufficient detail in relation to the locations where the Policy will apply, the types of development to which it will apply and the items for which developer contributions will be sought.

The Reporter could, if so minded, amend the Plan to replace Policy CDP 12 with the following revised Policy:

The Council will require developers to undertake an assessment of the proposal site and its surroundings (according to the approach set out in CDP 1 – Placemaking Principle and associated Supplementary Guidance) in order to determine the need for, and the proposed response to, the requirements specified below in this policy. In some cases, it will be appropriate to incorporate these within the development. In other circumstances, the best solution may be to take advantage of opportunities outwith the site, or to meet these requirements through the payment of a financial contribution or the transfer of land. The assessment should also include where appropriate (on a confidential basis) a programme for the delivery of these requirements, and details of how this will impact on development phasing and the developer's cash flow.

On the basis of this assessment, developers are required to make specific provision relating to the proposed development to address the following matters:

City-wide

- Open Space - quantitative or qualitative deficiencies in open space provision or access to open space (according to the standards and priorities identified by the Glasgow Open Space Strategy).
  - Class 9: Residential (10 units or more),
  - Purpose-built student accommodation and
  - All other development, where it is demonstrated that, in complying with the Placemaking Supplementary Guidance, there is a justification for not satisfying the standards for provision of open space, as set out in the Green Belt and Green Network Supplementary Guidance.
- Surface water drainage requirements, either as part of the development or in relation to a wider solution that is consistent with a Surface Water Management Plan – all development.

Clyde Fastlink

- All development within the Developer Contribution Zones of the Clyde Fastlink Core Route and Proposed Route.

City Centre

- Open Space and Public Realm - quantitative or qualitative deficiencies in open space and public realm provision or access to open space and public realm (according to the standards and priorities identified by the Open Space Strategy).

- Class 9: Residential (10 units or more);
- Class 1: Retail (greater than 2,000 sqm gross floor area);
- Class 4: Office (greater than 2,000 sqm gross floor area);
- Class 11: Assembly and Leisure (greater than 2,000 sqm gross floor area); and
- Purpose-built student accommodation.

Detailed aspects of these requirements, including: calculations for financial contributions; legal agreements; and timing and phasing of payments, are set out in Supplementary Guidance. This policy should be read in conjunction with those on the Placemaking Principle, Sustainable Transport, Meeting Housing Needs, Greenbelt and Green Network, and Water Environment.

00479/8/002 Hillhead Community Council - Paragraph 12 of Circular 6/2013 (*CE11*) refers to the potential for negative impacts on land use, the environment or infrastructure to be reduced, eliminated or compensated for. In this context, and bearing in mind the legal tests referred to above, the word 'mitigation' is considered to be appropriate. The purpose of planning obligations is not to permit unacceptable proposals.

No modifications recommended.

00479/8/003 Hillhead Community Council - The use of planning obligations (including financial contributions) is an accepted method of overcoming obstacles to granting planning permission, provided that the obligation meets the legal tests set out in Circular 3/2012: Planning Obligations and Good Neighbour Agreements (*CE23*).

No modifications recommended.

00479/8/004 Hillhead Community Council - Infill development is not considered to be of a scale that falls within the scope of this policy. These proposals would be assessed against relevant CDP Policy and Supplementary Guidance.

The Plan contains policies which operate at a strategic City-wide level. In accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 is absent from the Plan, but will be incorporated within a suite of Supplementary Guidance that will accompany the Plan.

No modifications recommended.

00497/12/001 Persimmon Homes, 00602/4/001 Homes for Scotland - The purpose of CDP 12 is to provide a framework for securing developer contributions through legal agreements, in circumstances where the use of conditions would not be enforceable, for example, where an obligation would be required to apply to successors in title. The Policy is considered to comply with the requirements of Circular 6/2013 (*CE11*).

No modifications recommended.

00602/4/001 Homes for Scotland, 00610/1/001 Glasgow Harbour Ltd - In terms of making reference to contributions in the Council's Action Programme, there is a reference to CDP 12 in Action No. 8 – Glasgow Open Space Strategy.

The Reporter could, if so minded, amend the Plan so that references be made to CDP 12 in Action 39 – Metropolitan Glasgow Strategic Drainage Partnership Scheme, and Action

## 71 – Clyde Fastlink Phase 2.

00610/1/001 Glasgow Harbour Ltd - The timescales for making contributions to these schemes will be set out in legal agreements related to any planning permission. Given the extended lead in times for major development, it would not be appropriate to limit the implementation of any infrastructure to five years.

No modifications recommended.

00497/12/001 Persimmon Homes, 00602/4/001 Homes for Scotland, 00636/14/001 George Capital LLP - In terms of development viability, the Council has a system of deferred and staged payments in place to assist with the funding of development. Details of this and other provisions in relation to viability will be set out in Supplementary Guidance.

No modifications recommended.

### Open Space and Community Facilities

00602/6/001 Homes for Scotland - The assessment of deficiencies in infrastructure/facilities will be carried out by the Council according to the requirements and standards set out in Policy and Supplementary Guidance. Should there be a requirement to provide infrastructure or facilities as a result of new development, this will be set out in any planning permission. It is not considered necessary to make reference to this in the Policy.

No modifications recommended.

### Public Transport Provision

#### 00633/19/001 Strathclyde Partnership for Transport - Page 59 – Context

The broad strategy of the CDP is to ensure, as far as possible, that development takes place in locations that are accessible by public transport. Where this is not achievable, the Council encourages the developer to seek appropriate solutions with public transport operators as part of any planning permission. The Council considers that it would not be appropriate to include specific obligations in the Plan to make financial contributions towards the temporary provision of public transport services, as it is difficult to predict the likely demand for such services in locations where the development of new housing can take a number of years to complete.

The Council would be willing to work with SPT, developers and the public transport operators to seek appropriate transport solutions in areas of significant housing growth, but considers that until a suitable approach can be agreed, that provision of public transport services should be addressed on an individual proposal basis.

No modifications recommended.

#### 00633/19/002 Strathclyde Partnership for Transport - Page 60 – Policy

The Council considers that the provision of public transport services should be a matter for agreement between the developer and the operators, rather than a requirement of

policy. The Council agrees that the text relating to transport needs could be clarified by the inclusion of the wording proposed, with the exception of the word “services”.

The Reporter could, if so minded, amend the third bullet on page 60 to read “transport needs (including active travel solutions and public transport infrastructure and facilities”.

00633/19/003 Strathclyde Partnership for Transport - Page 60 – Policy

The inclusion of a policy requiring developer contributions towards the implementation of the Fastlink proposal was based on the business case developed jointly by the Council, SPT and the Scottish Government. The business case related to the development of the core route (which has now been funded and is being implemented) and other identified routes within Glasgow and connecting to neighbouring authorities.

While SPT’s aspiration to rollout the Fastlink standard on quality bus corridors is supported in principle by the Council, it is considered that it would be inappropriate at this stage to make reference to this aspiration in Policy CDP 12 until a similar business case to that developed for Clyde Fastlink had been made and agreed by the appropriate bodies.

#### Supporting

00637/22/001 Dowanhill Hyndland and Kelvinside Community Council - Noted.

#### **Reporter’s conclusions:**

##### Level of detail and accompanying Supplementary Guidance

1. A number of representations were made relating to the issue of developer contributions and the Proposed Plan. An over-arching comment was that the policy lacked detail, and without that detail, parties felt limited in the comments they could make. A number of parties expressed dissatisfaction with the lack of the accompanying Supplementary Guidance (SG), in which the council intends to set out the detail of how and where the policy will be implemented.

2. The council is not obliged to produce SG in conjunction with the Proposed Plan, but can produce it afterwards if it is justified by the policy content of the Proposed Plan. In this instance, the proposed SG Delivering Development will not be available for public comment until after the Proposed Plan is examined and adopted. I agree that without the detailed guidance setting out how Policy CDP12 will be applied, there is limited clarity at this point in time for communities and developers. However, this is not a matter that can be resolved through the Plan examination process, where I can only have regard to the material forming part of the Plan as submitted for examination. Any SG prepared to form part of this Plan at a later stage will follow the appropriate public consultation period, at which point submissions could be made. I do not consider it appropriate to amend the policy, as I find that the production of the appropriate SG should resolve the representations. Issue 54 of this examination report addresses the specific issue of SG.

3. Representations have also been made regarding the level of detail in the policy and accompanying text. The production of the accompanying SG will resolve a number of these representations as set out above. The Action Programme which accompanies the Proposed Plan sets out at Action No. 8 the intention to prepare SG – Multi-Functional

Green Network, which will contain standards for new development including open space for residential schemes. I agree that the level of detail in the Action Programme does not provide a full picture of what facilities will be required to be delivered by developers, but the council has stated that it intends to provide that detail in the proposed SG Delivering Development. At this point in the plan preparation and examination process, the council is not obliged to produce the detail that will be contained in SG. I do not consider it appropriate to amend the policy, as I find that the production of the appropriate SG should resolve the representations. I consider that the proposed modifications set out below would give a level of detail in the Policy sufficient to address the concerns raised regarding the potential content of the proposed SG.

#### Wording of Policy

4. Concern has been expressed about the use of the word “mitigation” in Policy CDP12. This word is used only in the accompanying text on page 59 “Context and Aims”, and is not used within the policy itself. No modification is required.

5. It has been suggested in representations that the implementation time for projects arising from developer contributions be limited to five years, as indefinite timeframes could lead to developments becoming unviable or lead to sites being permanently sterilised. I do not consider it appropriate for the Proposed Plan to set such time limits, as each legal agreement is prepared on the basis of the specific development proposal and delivery may be contingent on matters that require a period of longer than 5 years to resolve. Other forces may also delay delivery of development, for example economic circumstances, but it may be that development remains appropriate and strategically desirable regardless of the delivery timeframe. I recommend no modification to the Proposed Plan.

6. Representations seek to have the impact of infill proposals specifically addressed in the policy. I find that any such proposals would be assessed against the policies of the Proposed Plan, and so would be subject to any appropriate obligations as required. I have found that the wording of the policy is sufficient to include all types of development, including infill buildings. I conclude that there is no amendment required and there would be no modification to the Proposed Plan.

7. The payment of financial contributions, instead of provision of services, is objected to in representations. I find that the Policy is in accordance with Circular 3/2010, in that it is appropriate to seek a financial contribution in lieu of actual provision, where circumstance demands it. I recommend no modification to the Proposed Plan.

8. In response to unresolved representations relating to this issue, the council suggested amended the wording of Policy CDP12. I consider that the suggested amended text for Policy CDP12, which was provided by the council and other parties in response to the FIR, addresses the concerns raised in many of the representations, as it provides clarity regarding which developments will be required to make provision for specific purposes. The amended text also sets out more clearly the types of development which may generate a need for contributions and / or provision of services and / or facilities.

9. A representation to the FIR sought further amendments to the text, relating to public transport provision and facilities. It related to earlier submissions which were supported by the council in the original response, but were omitted from the suggested amended text to the Policy. I agree that the inclusion of the additional bullet point in the city-wide

section is appropriate, and the Proposed Plan should be modified accordingly.

#### Action Programme

10. Representations have suggested that the Action Programme accompanying the Plan is not detailed enough to provide certainty about which projects could generate the need for developer contributions, and that the Action Programme should be linked to Policy CDP12.

11. The council agrees that there could be additional cross-referencing between the two documents and have suggested a number of changes to the Action Programme to refer to Policy CDP12.

12. I agree that the links between the two documents are not all that clear, and that a greater level of cross-referencing would result in greater clarity for those using the Proposed Plan. The modifications proposed by the council are supported, and I also conclude that there should be a specific reference to the Action Programme in the final paragraph of Policy CDP12. The Proposed Plan should be modified accordingly.

#### Fastlink

13. Representations have sought to have the Fastlink concept rolled out to all the Quality Bus Corridors in the Proposed Plan area. Issue 50 of this examination specifically looked at the identification of Fastlink on such corridors and concluded that there is no evidence to demonstrate that all Quality Bus Corridors will be upgraded to Fastlink routes, as there appears to be no committed capital programme to deliver such upgrades in the Proposed Plan period, or identification of the sites required to deliver the routes. On that basis, I concluded that the Proposed Plan should not be amended to safeguard potential Fastlink routes.

14. It may be that when there is greater certainty, such routes could be included in future Plans, and so then could contain a reference to potential requirements for developer contributions. I recommend no modification to the Plan.

15. The final bullet point of paragraph 3 of the Policy identifies that individual assessments will be required for Fastlink Core Route and Fastlink Proposed Route Contribution Zones, to determine the precise contributions required from development proposals within the zones. Representations have pointed out that the area in which these assessments would be made, and the basis for the assessments, are not identified in the Proposed Plan. The representation seeks to have the contribution zones illustrated on the Policy and Proposals Map, and an explanation in the Proposed Plan of the justification and methodology used to define the Zones and the type of development that would contribute.

16. I find that without a clear delineation of the contribution zones in the Proposed Plan accompanied by a reasoned justification for the contributions, the proposed assessments may not be in accordance with paragraph 139 of Circular 6/2013, which requires the items and the circumstances in which they will be sought to be included in the Proposed Plan, not in SG. In addition, the Fastlink Core route is now delivered and operational, and further contributions should not be sought to fund it. Bullet point one of the paragraph headed "*Clyde Fastlink*" within the council's suggested revision to Policy CDP12 should be amended accordingly.



17. From the material before me, I can see no evidence that the developer contribution zones for the Fastlink Proposed Route have formed part of the required public consultation process that the Proposed Plan has followed. In order to deliver the appropriate contributions from the Proposed Route, I expect that the proposed Supplementary Guidance will include a reasoned justification and methodology for the proposed individual assessments in the relevant zone, but that a plan illustrating the extent of the contribution zones should have been included in the Proposed Plan Policy and Proposals Map. An FIR was issued on 3 March 2106 seeking a plan illustrating the Fastlink Contribution Zones, and this has been provided by the council. Those parties who also responded to the FIR agree that the plan is appropriate for inclusion in the Proposed Plan. I recommend that the Proposed Plan be modified by the inclusion of the boundary of the contribution zone on the Policy and Proposals Map.

#### Development Viability

18. Representations to the FIR have suggested the insertion of additional text seeking a reduction or waiver of developer contributions where such costs may render the proposal unviable.

19. I find that the individual financial circumstances of sites and projects will be so varied, that a 'catch all' reduction or waiver may not be appropriate as part of Policy CDP12. However, there is a need to ensure that the contributions sought are proportionate, and do not render otherwise acceptable development unviable. I conclude that adding viability to the required assessment in paragraph one of the revised text of Policy CDP12 should address this issue. The Proposed Plan should be modified accordingly.

#### **Reporter's recommendations:**

Modify the Proposed Plan by revising Policy CDP12 as follows:

*"The Council will require developers to undertake an assessment of the proposal site and its surroundings (according to the approach set out in CDP 1 – Placemaking Principle and associated Supplementary Guidance) in order to determine the need for, and the proposed response to, the requirements specified below in this policy. In some cases, it will be appropriate to incorporate these within the development. In other circumstances, the best solution may be to take advantage of opportunities outwith the site, or to meet these requirements through the payment of a financial contribution or the transfer of land. The assessment should also include where appropriate (on a confidential basis) a programme for the delivery of these requirements, and details of how this will impact on development phasing and the developer's cash flow.*

*On the basis of this assessment, developers are required to make specific provision relating to the proposed development to address the following matters:*

#### *City-wide*

- *Open Space - quantitative or qualitative deficiencies in open space provision or access to open space (according to the standards and priorities identified by the Glasgow Open Space Strategy)*
- *Class 9: Residential (10 units or more)*
- *Purpose-built student accommodation and*
- *Surface water drainage and flood management requirements, either as part of the development or in relation to a wider project identified within a Surface Water*

*Management Plan or elsewhere (all development)*

*Clyde Fastlink*

- *All development within the Developer Contribution Zone of the Clyde Fastlink Proposed Route.*

*City Centre*

- *Open Space and Public Realm - quantitative or qualitative deficiencies in open space and public realm provision or access to open space and public realm (according to the standards and priorities identified by the Open Space Strategy)*
  - *Class 9: Residential (10 units or more)*
  - *Class 1: Retail (greater than 2,000 square metres gross floor area);*
  - *Class 4: Office (greater than 2,000 square metres gross floor area);*
  - *Class 11: Assembly and Leisure (greater than 2,000 square metres gross floor area)*
  - *Purpose-built student accommodation and*
  - *Transport needs (including active travel solutions and public transport infrastructure and facilities)*

*Over and above these obligations, individual assessments will be required to identify the impacts arising from development and the mitigation required in the following areas identified in the Plan, or in locations considered to be acceptable in principle:*

- *Gartloch/Easterhouse Community Growth Area, Transformational Regeneration Areas, and Proposed Additions to Land Supply (see Policy and Proposals Map)*
- *Economic Development locations (see Policy and Proposals Map) where significant change is anticipated or proposed*
- *Network of Centres (see Policy and Proposals Map) or sequentially preferred locations*
- *Strategic Development Framework (SDF) Areas, River Clyde Development Corridor SDF, Local Development Frameworks (see Figure 13 – Sustainable Spatial Strategy) and*
- *Fastlink Proposed Route (see Policy and Proposals Map)*

*Detailed aspects of these requirements, including: calculations for financial contributions; legal agreements; and timing and phasing of payments, methodology and justification for the Fastlink Proposed Route Developer Contribution assessments are set out in Supplementary Guidance, and a plan illustrating the Developer Contribution Zones for the Fastlink Proposed Route is included in the Policy and Proposals Map.*

*This policy should be read in conjunction with those on the Placemaking Principle, Sustainable Transport, Meeting Housing Needs, Greenbelt and Green Network, and Water Environment, and in conjunction with the Action Programme where applicable.”*

Issue 54	Relationship Between CDP Policy and Supplementary Guidance	
Development plan reference:	The Plan	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
Ediston Properties Ltd (00557) Margaret Greene (00589) Dr Simon J Cuthbert (00593) Homes for Scotland (00602) Scottish Government (00621)		
Provision of the development plan to which the issue relates:	This covers each of the key policies and relates to the relationship between the Plan and the associated supplementary guidance.	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00557/1/001 Ediston Properties Ltd - Policy CDP4 relates to the network of centres and in terms of the assessment of applications makes a number of references to "Supplementary Guidance". At this stage, this Supplementary Guidance does not exist and, therefore, it is not possible to make any comment on the specifics of the policy.  00589/1/001 Margaret Greene, 00593/2/002 Dr Simon J Cuthbert - Seeks changes to Action Programme, Action 9. The description of the SG to be produced should be changed from Biodiversity to "Biodiversity AND Geodiversity".  00621/1/001 Scottish Government - Supplementary Guidance may only deal with the provision of further information or detail in respect of policies or proposals set out in the Plan and then only if those are matters which are expressly identified in the Plan, as matters which are to be dealt with in Supplementary Guidance. There are various instances within the Plan where Supplementary Planning guidance is referred to, however, there is not a strong hook to the guidance within the policy itself. The relationship between the Plan and Supplementary Guidance should be revisited in order to ensure the relevant link is clear in the policy.  00621/2/001 Scottish Government - The proposed 29 individual pieces of Supplementary Guidance which are to accompany the Plan is too great. The Plan should be changed to present a more proportionate and consolidated suite of Supplementary Guidance to ensuring that related policy areas are included within one Supplementary Guidance document which will aid accessibility for the reader/user and reduce the amount of cross-referencing required.  00602/5/001 Homes for Scotland - Requests that the publication of all the relevant Supplementary Guidance before the Plan is submitted to Ministers for Examination, to allow stakeholders to understand if the Plan policies are sufficiently comprehensive and to be satisfied that no policy requirements are being introduced through Supplementary		

Guidance.
<b>Modifications sought by those submitting representations:</b>
<p>00557/1/001 Ediston Properties Ltd - Supplementary Guidance should form part of the LDP and should be prepared and consulted on at the same time.</p> <p>00589/1/001 Margaret Greene, 00593/2/002 Dr Simon J Cuthbert - Amend Action 9 of Action Programme to change description of the SG to be produced from Biodiversity to "Biodiversity AND Geodiversity".</p> <p>00621/1/001 Scottish Government - The relationship between the Plan and Supplementary Guidance should be revisited in order to ensure the relevant link is clear in Plan policy.</p> <p>00621/2/001 Scottish Government - Consolidation of the 29 pieces of supplementary guidance into a more proportionate number.</p> <p>00602/5/001 Homes for Scotland - All the relevant Supplementary Guidance should be published before the Plan is submitted to Ministers for Examination.</p>
<b>Summary of responses (including reasons) by planning authority:</b>
<p><u>Objecting</u></p> <p>00589/1/001 Margaret Greene, 00593/2/002 Dr Simon J Cuthbert - It is the Council's intention that the suite of Supplementary Guidance that will be brought forward to support the Plan will be a simplified version of that set out in Table 1 of the Proposed Plan, with a single piece of Supplementary Guidance to support each of the Plan's policies. The Supplementary Guidance to support policy CDP7, to be called Natural Environment, will include a section on Geodiversity.</p> <p>The Reporter could, if so minded, amend Table 1 on Page 28 of the Plan to reflect the changes identified below. This new table would list all of the Supplementary Guidance associated with the Plan and provide a summary of the contents of each. The Supplementary Guidance to support policy CDP7 to be called 'Natural Environment'</p> <p>00557/1/001 Ediston Properties Ltd, 00621/1/001, 00621/2/001 Scottish Government, 00602/5/001 Homes for Scotland - Not all of the Supplementary Guidance associated with the Plan will be available before the Plan is submitted to Ministers for Examination. Page 11; Para 141 of Circular 6/2013: Development Planning (<i>CE11</i>) states that 'the content of Supplementary Guidance does not need to be scrutinised at Examination given that the principle of the policy or proposal will already have been scrutinised and subsequently included in the SDP or LDP - the Supplementary Guidance will be limited to providing further detail on that.'</p> <p>In terms of the content of Supplementary Guidance, Page 11; Para 138 of Circular 6/2013 (<i>CE11</i>) refers to Regulation 27(2) which requires Supplementary Guidance 'to cover topics specifically identified in the SDP or LDP as being topics for Supplementary Guidance and be limited to the provision of further information or detail in respect of policies or proposals set out in the SDP or LDP. There must be a sufficient 'hook' in the SDP or LDP policies or proposals to hang the Supplementary Guidance on, in order to</p>

give it statutory weight.' In the interests of clarity and transparency, however, it would be helpful to add text to the end of each policy in the Plan to provide a more explicit link to the associated Supplementary Guidance and to provide further detail on the content of that guidance.

The Reporter could, if so minded, add text to the end of each policy in the Plan as follows:

#### SG1: The Placemaking Principle

SG1 supports the above policy by providing guidance to promote the overarching Placemaking Principle being applied in new development.

The guidance shall set out how developers will be expected to incorporate a design-led approach within the context of the Placemaking Principle CDP1 which encompasses the Six Qualities of Place. It will provide a toolkit reflecting the emerging National Place Standards, designed to illustrate how development should seek to respond to the physical and spatial context as well as a means to demonstrate how the development has responded to the expectations set out in Policy CDP1.

All development shall be considered against the following as applicable:

- principles of good design
- protecting and enhancing the historic and natural environment
- residential development and development affecting residential amenity
- embedding community facilities
- promoting healthy development and access to open space
- accessibility and barrier free Homes
- River Clyde and Forth and Clyde Canal (subject to replacement by SDF'S)
- signs and advertising
- public realm
- vacant land and buildings
- air quality
- noise management
- waste and recycling

#### SG2: Sustainable Spatial Strategy

SG2 supports the above policy by providing guidance for the priority areas identified in the Sustainable Spatial Strategy. Accordingly SG2 includes advices on:

- Strategic Development Frameworks Areas (large areas of the City)
  - City Centre
  - River Clyde
  - Govan/Partick
  - Inner East
  - Greater Easterhouse
  - Glasgow North
- Local Development Frameworks (neighbourhood level)
  - Drumchapel
  - South Central
  - Pollok

SG3: Economic Development

SG3 supports the above policy by providing guidance on the creation of economic opportunities. Accordingly SG3 includes advice on:

- directing key growth sector development in the City
- SEIL's and Areas of City-Wide Economic Importance
- non business or industrial development in Economic Development Areas
- business and industrial development outwith Economic Development Areas
- economic development in the City and Town Centres
- higher and further education and major health facilities
- infrastructure for economic development
- low amenity industrial operations

SG4: Network of Centres

SG4 supports the above policy by providing guidance on the role and function of the City's Network of Town Centres and associated key issues and by providing advice on types of retail and commercial leisure developments. Accordingly SG4 includes advice on:

- the Town Centres First and Sequential Approach
- the City's Network of Centres (which includes Town Centres, other retail and commercial leisure centres, local shopping facilities and locations outwith the Network of Centres)
- tackling long term vacancies and/or environmental dereliction within Town Centres
- accessibility to, between and within Town Centres
- types of Retail and Commercial Leisure Development (to include large scale retail and commercial leisure development, food, drink and entertainment uses, pay day lenders/betting offices, childcare services, other retail development and alterations to shops and other commercial buildings)

SG5: Resource Management

SG5 supports the above policy by providing guidance on the use and derivation of energy and the processing of waste in new development. Accordingly, SG5 includes advice on:

- the production of renewable energy and heat (including different sources and, where appropriate, favoured locations), its use in new development and how new proposals will be assessed
- more efficiently using, and distributing, energy and heat, including through heat mapping and district heating
- designing new development to reduce energy use including, if appropriate, urban lighting
- the use of low and zero carbon generating technologies (including different sources) in new development
- the means by which the impact of new energy/heat proposals will be assessed
- sub-surface infrastructure
- on-shore oil and gas extraction and the means by which its land use implications will be assessed
- energy and carbon masterplanning
- waste storage, recycling and collection in new development
- the means by which proposals for new waste management facilities will be assessed

### SG6: Green Belt and Green Network

SG6 supports the above policy by providing guidance on the Green Belt, open space and the Green Network. Accordingly, SG6 includes advice on:

- the means by which proposals for development in the Green Belt will be assessed, including types of development that may be acceptable provided other considerations can be satisfactorily addressed
- the means by which proposals for development that may adversely impact on the Green network, including open space, will be assessed and, where appropriate, mitigated (including, where appropriate, in the form of compensatory provision)
- additional advice on the assessment of proposals for development in parks;
- the enhancement and extension of the green network in new development (including the role of green roofs) to deliver improved links and multifunctional benefits
- standards for the provision of open space in new development and how they will be used
- the role of the Open Space Strategy in guiding new development and the enhancement of the Green Network and Open Spaces
- the assessment of proposals for mineral extraction

### SG7: Natural Environment

SG7 supports the above policy by providing guidance on the natural environment, including protected sites and species and the enhancement of biodiversity. Accordingly, SG7 includes advice on:

- sites designated for their importance for nature conservation, landscape or geodiversity, including the detailed boundaries of such sites and justifications for their designation (justifications for nature conservation and landscape designations to be set out in a future iteration of Supplementary Guidance);
- protected species and habitats
- the means by which proposals for development that may adversely impact (including indirectly and/or cumulatively) on a protected species or habitat, or a site designated for nature conservation, landscape or geodiversity importance, will be assessed and, where appropriate, how impacts will be minimised and/or mitigated (including site appraisal and survey, licensing, mitigation and management)
- the means by which new development can enhance habitats/biodiversity (including geodiversity), including through creating, improving and better linking habitats and ecosystems
- the responsibilities of the developer with regard to invasive non-native species
- how trees, woodland and hedgerows, not covered by a Tree Preservation Order (or as if covered by a TPO), should be addressed in new development (including the role of the Scottish Government's Policy on Control of Woodland Removal)

### SG8: Water Environment

SG8 supports the above policy by providing guidance on the water environment, including reducing flood risk, provision of SUDS, improving water quality and habitats and enabling development. Accordingly, SG8 includes advice on:

- avoiding an increase in, and where possible reducing, flood risk
- the role of the Metropolitan Glasgow Strategic Drainage Partnership, Surface Water Management Plans and the River Clyde Flood Management Strategy, including identification and protection of land that contributes towards sustainable flood

management

- when flood risk screening, flood risk assessment and drainage impact assessment may be required and, in conjunction with the flood risk framework, the role they will play in the assessment of development proposals
- development on the functional flood plain
- land raising, including the exceptional circumstances in which it may be acceptable
- surface water drainage strategies and sustainable urban drainage strategies;
- the role of Scottish water as provider of water and waste water services;
- proposals including culverting, deculverting, the naturalising of watercourses and/or natural flood management;
- opportunities for the development of the green network, including active travel and habitat enhancement
- the protection and improvement of the water environment
- maintenance and adoption

#### SG9: Historic Environment

SG9 supports the above policy by providing guidance on the Historic Environment. Accordingly SG9 includes advice on:

- works affecting the exterior of listed buildings and unlisted buildings in Conservation Areas
  - alterations to the interiors of listed buildings
  - development in the curtilage of listed buildings and properties in Conservation Areas including new buildings
  - development affecting the setting of listed buildings and properties in Conservation Areas
  - maintaining listed Buildings and properties in Conservation Areas
  - Article 4 Directions affecting Conservation Areas
  - Sites of Archaeological Importance
  - Ancient Monuments and Scheduled Ancient Monuments
  - The Frontiers of the Roman Empire (Antonine Wall) World Heritage Site
- Supplementary Planning Guidance produced by Historic Scotland will be adopted as statutory Supplementary Guidance alongside the Plan. This Guidance provides advice for developers, decision makers and the general public and will be a material consideration in the assessment and determination of planning applications affecting the Antonine Wall and its setting

#### SG10: Meeting Housing Needs

SG10 supports the above policy by providing guidance on the locational and residential amenity implications of development proposals for residential and visitor accommodation. Accordingly, SG10 includes detailed advice and guidance on development of:

- short stay and tourist accommodation
- purpose-built student accommodation
- houses in multiple occupancy
- care in the community housing

#### SG11: Sustainable Transport

SG11 supports the above policy by providing guidance on how development proposals will be expected to address the transport implications that they give rise to. Accordingly,



SG11 includes detailed advice and guidance on:

- the provision and design of parking for vehicles, including the charging of electric vehicles, in new development
- the provision and design of parking for bicycles in new development;
- car free housing
- public off-street parking in the City Centre
- outdoor access rights
- promoting active travel in new developments
- the safeguarding of existing transport routes and core paths
- development and design of new walking and cycling routes, including; network proposals emerging from the refresh of the Council's Strategic Plan for Cycling; the aspirational cycle routes identified in this policy; and linkages to existing and proposed routes
- transport assessments and travel plans
- guiding developments to locations which are accessible by public transport and active travel
- former rail formations
- safeguarding land required for transport proposals identified in the CDP or through ongoing or proposed studies, and where justified by STAG appraisals, as necessary
- the Glasgow Airport Safeguarding Area
- the design of new residential areas, interpreting the guidance set out in Designing Streets for the Glasgow context

#### SG12: Delivering Development

SG 12 supports the above policy by providing guidance on the contributions that developers will be expected to make to ensure that the City's infrastructure can accommodate new development. Accordingly, SG12 includes detailed advice and guidance on:

- the provision of open space of appropriate quality, quantity and accessibility in association with new development
- the requirements of development within the identified zone of the Clyde Fastlink proposal
- the surface water drainage requirements of development, either on site or in the form of strategic solutions identified by the MGSDP scheme

The Reporter could, if so minded, amend Table 1 on Page 28 of the Plan to reflect the changes identified above. This new table would list all of the Supplementary Guidance associated with the Plan and provide a summary of the contents of each.

#### **Reporter's conclusions:**

##### Inclusion of Supplementary Guidance for examination

1. Representations have objected to the non-inclusion of Supplementary Guidance (SG) with the Proposed Plan. It is felt that without the relevant SG to accompany the policies in the Proposed Plan, it has not been possible to make full and informed representations.
2. I find that it would be beneficial to have a greater level of detail to accompany policies that are not accompanied by the detail that may determine issues such as site capacity, site boundaries, required assessments etc. However, the council is not obliged to

produce SG in conjunction with the Proposed Plan, but can produce it afterwards if it is justified by the policy content of the Plan. Circular 6/2013: Development Planning (CE11) at paragraph 141 states that *'the content of Supplementary Guidance does not need to be scrutinised at Examination given that the principle of the policy or proposal will already have been scrutinised and subsequently included in the SDP or LDP - the Supplementary Guidance will be limited to providing further detail on that.'*

3. I agree that, without the detailed guidance, there is limited clarity at this point in time for both communities and developers. However, this is not a matter that can be resolved through the examination process, where I can only have regard to the material forming part of the Proposed Plan as submitted for examination. Any SG prepared to supplement the Plan at a later stage will follow the appropriate public consultation period, at which point submissions can be made. There is no modification to the Proposed Plan.

#### Proposed number of Supplementary Guidance

4. Representations also sought to consolidate the proposed range of 29 pieces of Supplementary Guidance into one per policy. The Council agreed that providing a single SG to support each of the Plan's policies is now its preferred approach, and that the suite of SG would be modified accordingly. An amended Table 1 would be provided.

5. I find that the council's response to the representation would resolve the issue and result in a more cohesive and comprehensible suite of SG. The Proposed Plan will be modified accordingly.

#### Relationship between the Plan and Supplementary Guidance

6. Representations also identified that the required "hook" in the text of each policy linking it to SG was not sufficiently robust. It was suggested that the relationship between the Proposed Plan and SG be revisited in order to ensure the relevant link is clear in the policy.

7. The council agrees that a more specific "hook" should be provided in each Plan policy and provided suggested text to be included as the final paragraph in each policy. The new text was circulated to all relevant parties as FIR 11. The additional comments received following the FIR period are addressed in these conclusions.

8. The council's response included text for each individual policy, and I find that each is appropriate for inclusion in the Proposed Plan. A response to the FIR sought to have an explicit reference to the requirement for an impact assessment to accompany a development proposal included in SG7. I agree that the proposed additional wording would give clarity to the SG. The Proposed Plan should be modified accordingly.

#### **Reporter's recommendations:**

Modify Proposed Plan Table 1 page 28 to refer to 12 SGs.

Modify Policy CDP1 The Placemaking Principle with the addition of the following text as a new final paragraph:

"SG1: The Placemaking Principle

*SG1 supports the above policy by providing guidance to promote the overarching Placemaking Principle being applied to all development in the city.*

*The guidance will set out how developers will be expected to incorporate a design-led approach within the context of the Placemaking Principle CDP1 and Glasgow's interpretation the Six Qualities of Place. It will provide a toolkit, designed to illustrate how development should seek to respond to the physical and spatial context (Character Environments) as well as a means to demonstrate how the development has responded to the expectations set out in Policy CDP1.*

*SG 1 also provides guidance on a number of specific topics related to successful placemaking where detailed guidance will assist in outlining expectations to support the development management process. All development shall be considered against the following topics as applicable:*

- *Successful residential development*
- *Protecting amenity*
- *River Clyde and Forth and Clyde Canal (subject to replacement by SDFs)*
- *City Centre development (subject to replacement by City Centre SDF)*
- *Delivering sustainable development*
- *Improving the public realm*
- *Protecting air quality*
- *Managing noise*
- *Designing for waste storage, recycling and collection in new development*
- *Development affecting commercial Premises*
- *Signs and advertising*
- *External fittings to buildings*
- *Detailed design guidance"*

Modify Policy CDP2 Sustainable Spatial Strategy with the addition of the following text as a new final paragraph:

*"SG2: Sustainable Spatial Strategy*

*SG2 supports the above policy by providing guidance for the priority areas identified in the Sustainable Spatial Strategy. Accordingly SG2 includes advice on:*

- *Strategic Development Frameworks Areas (large areas of the City)*
  - *City Centre*
  - *River Clyde*
  - *Govan/Partick*
  - *Inner East*
  - *Greater Easterhouse*
  - *Glasgow North*
- *Local Development Frameworks (neighbourhood level)*
  - *Drumchapel*
  - *South Central*
  - *Pollok*
- *Locations identified within the City Centre Strategy"*

Modify Policy CDP3 Economic Development with the addition of the following text as a new final paragraph:

*“SG3: Economic Development*

*SG3 supports the above policy by providing guidance on the creation of economic opportunities. Accordingly SG3 includes advice on:*

- *directing key growth sector development in the City*
- *SEIL’s and Areas of City-Wide Economic Importance*
- *non business or industrial development in Economic Development Areas*
- *business and industrial development outwith Economic Development Areas*
- *economic development in the City and Town Centres*
- *higher and further education and major health facilities*
- *infrastructure for economic growth*
- *low amenity industrial operations”*

Modify Policy CDP 4 Network of Centres with the addition of the following text as a new final paragraph:

*“SG4: Network of Centres*

*SG4 supports the above policy by providing guidance on the role and function of the City’s Network of Town Centres and associated key issues and by providing advice on types of retail and commercial leisure developments. Accordingly SG4 includes advice on:*

- *Assessing development proposals by location, including guidance on the Town Centres First Principle and Sequential Approach*
- *The role and function of the City’s Network of Centres (which includes Town Centres, other retail and commercial leisure centres, local shopping facilities and locations outwith the Network of Centres)*
- *Accessibility to, between and within Town Centres*
- *Assessing specific types of Retail and Commercial Leisure Development (to include large scale retail and commercial leisure development, food, drink and entertainment uses, other retail development.”*

Modify Policy CDP 5 Resource Management with the addition of the following text as a new final paragraph:

*“SG5: Resource Management*

*SG5 supports the above policy by providing guidance on the use and derivation of energy and the processing of waste in new development. Accordingly, SG5 includes advice on:*

- *the production of renewable energy and heat (including different sources and, where appropriate, favoured locations), its use in new development and how new proposals will be assessed*
- *more efficiently using, and distributing, energy and heat, including through heat mapping and district heating*
- *designing new development to reduce energy use including, if appropriate, urban lighting*

- *the use of low and zero carbon generating technologies (including different sources) in new development*
- *the means by which the impact of new energy/heat proposals will be assessed*
- *sub-surface infrastructure*
- *on-shore oil and gas extraction and the means by which its land use implications will be assessed*
- *energy and carbon masterplanning*
- *the means by which proposals for new waste management facilities will be assessed”*

Modify Policy CDP6 Green Belt and Green Network with the addition of the following text as a new final paragraph:

“SG6: Green Belt and Green Network

*SG6 supports the above policy by providing guidance on the Green Belt, open space and the Green Network. Accordingly, SG6 includes advice on:*

- *the means by which proposals for development in the Green Belt will be assessed including types of development that may be acceptable provided other considerations can be satisfactorily addressed*
- *the means by which proposals for development that may adversely impact on the Green Network, including open space, will be assessed and, where appropriate, mitigated (including, where appropriate, in the form of compensatory provision)*
- *additional advice on the assessment of proposals for development in parks*
- *the enhancement and extension of the green network in new development (including the role of green roofs) to deliver improved links and multifunctional benefits*
- *standards for the provision of open space in new development and how they will be used*
- *the role of the Open Space Strategy in guiding new development and the enhancement of the Green Network and Open Spaces*
- *the assessment of proposals for mineral extraction”*

Modify Policy CDP7 Natural Environment with the following text as a new final paragraph:

“SG7: Natural Environment

*SG7 supports the above policy by providing guidance on the natural environment, including protected sites and species and the enhancement of biodiversity. Accordingly, SG7 includes advice on:*

- *sites designated for their importance for nature conservation, landscape or geodiversity, including the detailed boundaries of such sites and justifications for their designation (justifications for nature conservation and landscape designations to be set out in a future iteration of Supplementary Guidance)*
- *protected species and habitats*
- *the means by which proposals for development that may adversely impact (including indirectly and/or cumulatively) on a protected species or habitat, or a site designated for nature conservation, landscape or geodiversity importance, should be accompanied by an assessment of such impacts and, where appropriate, details of how impacts will be minimised and/or mitigated (including site appraisal and survey, licensing, mitigation and management)*

- *the means by which new development can enhance habitats/biodiversity (including geodiversity), including through creating, improving and better linking habitats and ecosystems*
- *the responsibilities of the developer with regard to invasive non-native species*
- *how trees, woodland and hedgerows, not covered by a Tree Preservation Order (or as if covered by a TPO), should be addressed in new development (including the role of the Scottish Government's Policy on Control of Woodland Removal)"*

Modify Policy CDP8 Water Environment with the following text as a new final paragraph:

*"SG8: Water Environment*

*SG8 supports the above policy by providing guidance on the water environment, including reducing flood risk, provision of SUDS, improving water quality and habitats and enabling development. Accordingly, SG8 includes advice on:*

- *avoiding an increase in, and where possible reducing, flood risk*
- *the role of the Metropolitan Glasgow Strategic Drainage Partnership, Surface Water Management Plans and the River Clyde Flood Management Strategy, including identification and protection of land that contributes towards sustainable flood management*
- *when flood risk screening, flood risk assessment and drainage impact assessment may be required and, in conjunction with the flood risk framework, the role they will play in the assessment of development proposals*
- *development on the functional flood plain*
- *land raising, including the exceptional circumstances in which it may be acceptable*
- *surface water drainage strategies and sustainable urban drainage strategies*
- *the role of Scottish Water as provider of water and waste water services*
- *proposals including culverting, deculverting, the naturalising of watercourses and/or natural flood management*
- *opportunities for the development of the green network, including active travel and habitat enhancement*
- *the protection and improvement of the water environment*
- *maintenance and adoption"*

Modify Policy CDP9 Historic Environment with the addition of the following text to form a new final paragraph:

*"SG9: Historic Environment*

*SG9 supports the above policy by providing guidance on the Historic Environment. Accordingly SG9 includes advice on:*

- *works affecting the exterior of listed buildings and unlisted buildings in Conservation Areas*
- *alterations to the interiors of listed buildings*
- *development in the curtilage of listed buildings and properties in Conservation Areas including new buildings*
- *development affecting the setting of listed buildings and properties in Conservation Areas*
- *maintaining listed buildings and properties in Conservation Areas*

- *Article 4 Directions affecting Conservation Areas*
  - *Sites of Archaeological Importance*
  - *Ancient Monuments and Scheduled Ancient Monuments*
  - *The Frontiers of the Roman Empire (Antonine Wall) World Heritage Site*
- Supplementary Planning Guidance produced by Historic Scotland will be adopted as statutory Supplementary Guidance alongside the Plan. This Guidance provides advice for developers, decision makers and the general public and will be a material consideration in the assessment and determination of planning applications affecting the Antonine Wall and its setting”*

Modify Policy CDP10 Meeting Housing Needs with the addition of the following text as a new final paragraph:

*“SG10: Meeting Housing Needs*

*SG10 supports the above policy by providing guidance on the locational and residential amenity implications of development proposals for residential and visitor accommodation. Accordingly, SG10 includes detailed advice and guidance on development of:*

- *short stay and tourist accommodation*
- *purpose-built student accommodation*
- *houses in multiple occupancy*
- *care in the community housing”*

Modify Policy CDP11 Sustainable Transport with the addition of the following text as a new final paragraph:

*“SG11: Sustainable Transport*

*SG11 supports the above policy by providing guidance on how development proposals will be expected to address the transport implications that they give rise to. Accordingly, SG11 includes detailed advice and guidance on:*

- *the provision and design of parking for vehicles, including the charging of electric vehicles, in new development*
- *the provision and design of parking for bicycles in new development*
- *car free housing*
- *public off-street parking in the City Centre*
- *outdoor access rights*
- *promoting active travel in new developments*
- *the safeguarding of existing transport routes and core paths*
- *development and design of new walking and cycling routes, including; network proposals emerging from the refresh of the Council’s Strategic Plan for Cycling; the aspirational cycle routes identified in this policy; and linkages to existing and proposed routes*
- *transport assessments and travel plans*
- *guiding developments to locations which are accessible by public transport and active travel*
- *former rail formations*
- *safeguarding land required for transport proposals identified in the CDP or through ongoing or proposed studies, and where justified by STAG appraisals, as necessary*

- *the Glasgow Airport Safeguarding Area*
- *the design of new residential areas, interpreting the guidance set out in Designing Streets for the Glasgow context”*

Modify Policy CDP12 Delivering Development with the following additional text to form a new final paragraph:

*“SG12: Delivering Development*

*SG 12 supports the above policy by providing guidance on the contributions that developers will be expected to make to ensure that the City’s infrastructure can accommodate new development. Accordingly, SG12 includes detailed advice and guidance on:*

- *the provision of open space of appropriate quality, quantity and accessibility in association with new development*
- *the requirements of development within the identified zone of the Clyde Fastlink proposal*
- *the surface water drainage and flood management requirements of development, either on site or in the form of strategic solutions identified by the MGSDP scheme”*

Modify the “Relevant Supplementary Guidance” box in each policy to reflect the updated suite of SG in Policy CDP3, CDP 4, CDP5, CDP6, CDP7, CDP8, CDP9, CDP10, CDP 11 and CDP12.



Issue 55	Policy and Proposals Map	
Development plan reference:	Policy and Proposals Map	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
The University of Glasgow (00474) Hillhead Community Council (00479) Lujo Properties Ltd (00564) Scottish Natural Heritage (00574) Clyde Gateway URC (00664)		
Provision of the development plan to which the issue relates:	The Policy and Proposals Map: <ul style="list-style-type: none"><li>• illustrates specific locations identified for policy protection</li><li>• shows proposals which are expected to happen during the lifetime of the Plan</li><li>• identifies sites of potential activity</li></ul> All of the above locations and sites are addressed in Policies CDP2 - CDP12	
Planning authority's summary of the representation(s):		
<u>Objecting</u>  00474/2/001 The University of Glasgow - The Plan (Policy and Proposals Map) should treat the "Masterplan Area" identified for the University of Glasgow Gilmorehill/Hillhead/Western Infirmary Campus area as a single area and not two masterplan areas as currently shown. This would recognise that the area in question is being treated as a single entity within the Campus Development Framework which has been prepared jointly by the University and the Council.  00564/2/001 Lujo Properties Ltd - The City Centre Principal Retail Area has changed over the last few years and the western end of Sauchiehall Street has become more of a focus for leisure and entertainment rather than retailing. The PRA boundary should be redrawn to include only the pedestrianised area of Sauchiehall Street and a more flexible policy should apply to the remaining part of Sauchiehall Street. Background Paper 4 seems to suggest this approach but is inconsistent with the Proposals Map.  00574/4/001 Scottish Natural Heritage - We recommend the Policy and Proposals Map is amended to show existing Local Nature Reserves as well as proposed New Local Nature Reserves and Proposed Extensions to Local Nature Reserves.  00479/27/004 Hillhead Community Council - Objects to the Policy and Proposals Map, Figure 15 and policies CDP6 and CDP7. These do not go far enough - further measures are needed to protect corridors and other wildlife reserves. There should be a restriction on development on the borders of wildlife reserves and corridors, whether brownfield sites or not. Of particular concern are: the size of development (quantity and height); demand for amenity space and recreation; proximity to reserves and wildlife corridors - noise disturbs wildlife and a barrier area should be considered.		

00664/6/002 Clyde Gateway URC - The South Dalmarnock Integrated Infrastructure Framework should be identified as a Masterplan area on the Policy and Proposals Map.

**Modifications sought by those submitting representations:**

00474/2/001 The University of Glasgow - The "Masterplan Area" identified for the University of Glasgow Gilmorehill/Hillhead/Western Infirmary Campus area should be identified as a single area and not divided into two masterplan areas as is currently shown on the Policy and Proposals Maps. In addition, the text "Masterplan Area", as shown in the Key of the Policy and Proposals Maps should be replaced with the text "Masterplan or Development Framework Area".

00564/2/001 Lujo Properties Ltd - The City Centre Principal Retail Area boundary should be redrawn to include only the pedestrianised area of Sauchiehall Street and a more flexible policy should apply to the remaining part of Sauchiehall Street.

00574/4/001 Scottish Natural Heritage - Amend Policy and Proposals Map to show existing Local Nature Reserves as well as proposed New Local Nature Reserves and Proposed Extensions to Local Nature Reserves.

00479/27/004 Hillhead Community Council - The Policy and Proposals Map should be revised to protect wildlife corridors and other wildlife reserves.

00664/6/002 Clyde Gateway URC - Amend the Policy and Proposals Map to show the South Dalmarnock Integrated Infrastructure Framework as a Masterplan area.

**Summary of responses (including reasons) by planning authority:**

Objecting

00474/2/001 The University of Glasgow - In view of the University's submission that the University of Glasgow Gilmorehill/Hillhead/Western Infirmary location should be considered as one area, the Council agrees that the Policy and Proposals Map could be amended.

In relation to the wording used in the key, the term "Masterplan Area" is generic, and is intended to cover a number of circumstances where development proposals for large areas will be brought forward in a co-ordinated approach. The Council is not inclined to accept this change.

The Reporter could, if so minded, amend the Policy and Proposals Map to show the University of Glasgow Gilmorehill/Hillhead/Western Infirmary campus area as a single Masterplan Area.

00564/2/001 Lujo Properties Ltd - The Council agrees that a more flexible approach is justified in the area of Sauchiehall Street to the West of the pedestrianised area which is designated in the Adopted City Plan as a Principal Retail Area and a Primary Retail Street. However it is considered that sufficient flexibility can be achieved by removing the Primary Retail Street designation from this part of the Street whilst retaining its status within the Principal Retail Area. Primary Retail Streets will be shown in Supplementary Guidance and it is the Council's intention to remove Primary Retail Street status from this part of Sauchiehall Street. However, Primary Retail Streets are not shown on the Policy

and Proposals Map and, since the Council does not consider that the area covered by the Principal Retail Area should change, it is recommended that no modifications are made on this matter.

However, it is considered that the term 'Principal Retail Area' does not reflect the full range of uses that exist in the City Centre. As such, changing the term 'Principal Retail Area' on the Policy and Proposals Map to 'Principal Retail and Commercial Area' would provide greater clarity.

The Reporter could, if so minded, amend the Policy and Proposals Map by deleting the term 'Principal Retail Area' and replacing it with 'Principal Retail and Commercial Area'.

00574/4/001 Scottish Natural Heritage, 00479/27/004 Hillhead Community Council - Policy CDP7 indicates that the Council will bring forward Supplementary Guidance to support this policy that will set out the detailed boundaries of designated landscape and nature conservation sites. The policy will protect the sites shown in the Supplementary Guidance. The policy indicates that proposals should not have an unacceptable effect, either directly, indirectly or cumulatively on these sites, and the Supplementary Guidance will provide further advice on how this will be done. This should ensure that development proposals in the areas immediately adjacent to the sites will not have an unacceptable impact on them. However, the Plan does not impose a restriction on development on the border of such sites as this would be contrary to Paragraph 196 of Scottish Planning Policy (CE2), which states that buffer zones should not be established around areas designated for their natural heritage importance.

The Policy and Proposals Map is intended to illustrate the plan's policies and proposals spatially and allow the specific location of proposals to be accurately identified. Existing designations are not proposals. Whilst they are the subject of policies, it is considered that it is not practical to show them on the Policy and Proposals Map because:

- some of the sites (including TPOS, LNRs, SSSIs, etc) are not designated through the development plan process and the Map could quickly become out of date; and
- there are a large number of such sites in Glasgow, sometimes overlapping – this would be difficult to illustrate clearly on a Policy and Proposals Map which also illustrates other policies and proposals.

No modifications recommended.

00664/6/002 Clyde Gateway URC – The Policy and Proposals Map identifies a number of areas for which masterplans are to be prepared and, for consistency, there would be merit in showing the South Dalmarnock Integrated Infrastructure Framework (OC60) in a similar way. It is also recognised in introducing a new masterplan to the Policy and Proposals Map, it would aid in the identification of masterplan locations to include a schedule of all masterplans, providing title and a summary of available status information as part of the City Development Plan document.

The Reporter could, if so minded, amend the Policy and Proposals Map to show the area of the South Dalmarnock Integrated Infrastructure Framework as a "Masterplan Area" under CDP2. As part of this alteration each of the Masterplans in the Policy and Proposals Map could be numbered and then appear a schedule detailing the masterplan name and status to be prepared by the Council.

**Reporter's conclusions:**University of Glasgow Gilmorehill/Hillhead/Western Infirmary

1. The representation sought to have the area covered by the Campus Development Framework which has been prepared jointly by the University and the council treated as a single masterplan in the Proposed Plan, on the Policy and Proposals Map. It is currently shown as two separate areas on the map. The representation also sought to have the text "Masterplan Area", as shown in the key of the Policy and Proposals Maps replaced with the text "Masterplan or Development Framework Area".
2. The council agrees with the requested modification in relation to the proposed single masterplan area but not to the proposed text change.
3. I find that as there is a framework in place which treats the area as a single entity, it would make sense to identify it as such on the Policy and Proposals Map. The Proposed Plan should be modified accordingly, to show the University of Glasgow Gilmorehill/Hillhead/Western Infirmary campus area as a single Masterplan Area.
4. In relation to the proposed text change, I find that the term 'masterplan' is wide enough to cover areas where there is a coordinated approach to development including frameworks, and to ensure that users of the Proposed Plan understand that the term could also include other initiatives. There is no modification to the Proposed Plan.

Primary Retail Street Designation

5. The representation sought to have the City Centre Principal Retail Area boundary amended to include the pedestrian part of Sauchiehall Street only, with the remainder of the street having a more flexible policy. It is claimed that the nature of this part of the street has changed, with a higher proportion of leisure and entertainment uses. The same point is considered within Issue 4 of the examination.
6. The council agrees that there is a difference in the two parts of the street, but suggests that Primary Retail Street status be removed from the area to the west of the pedestrianised part of Sauchiehall Street. The whole of the street would remain within the Principal Retail Area, and this change would be reflected in the proposed Supplementary Guidance (SG).
7. The council considers that the term 'Principal Retail Area' does not reflect the full range of uses that exist in the City Centre, and requests a change from the term 'Principal Retail Area' on the Policy and Proposals Map to 'Principal Retail and Commercial Area' to reflect the range of uses in these areas.
8. Having visited the area, I agree that the area west of the pedestrianised has a different proportion of uses, and is characterised more by leisure and entertainment uses. A designation to reflect that change would be appropriate. The council's suggestion of including that such an amendment in the proposed SG is acceptable, and would not give rise to a modification of the Proposed Plan.
9. The term 'Principal Retail and Commercial Area' is a more accurate description of the range of uses in the City Centre, and so I agree that the Policy and Proposals Map should be amended. (See Issue 57 for a linked modification)

Local Nature Reserves, Wildlife Reserves and Wildlife Corridors

10. Representations seek to have the boundaries of existing and proposed designated conservation sites illustrated on the Policy and Proposals Map. Buffer zones are also sought to restrict development on the edges of such areas. Similar comments are considered elsewhere in the examination report at Issue 14.

11. The Council considers that Policy CDP7 and the associated SG will provide policy protection for such area, and that illustrating each one of them on the Map would be difficult because of the number of them and the fact that some designations overlap with others. SPP is clear at paragraph 196 that buffer zones should not be established around areas designated for their natural heritage importance.

12. I have considered the content of the Map, and agree that illustrating all existing and proposed nature designations would make the Map difficult to read, as adding such designations could lead to overlapping and obscuring of other land designations. However, I do agree that the Proposed Plan should properly illustrate land designations and I note that paragraph 6 of Policy CDP7 sets out the intention to provide such a map illustrating nature, wildlife and landscape designations in the proposed SG. I recommend no modification to the Proposed Plan.

South Dalmarnock Integrated Infrastructure Framework

13. The representation sought to have the South Dalmarnock Integrated Infrastructure Framework area illustrated as a masterplan for consistency, as it is an area where an integrated approach to development is being pursued. A schedule of all masterplan areas in the Plan is also sought by the representation. The council agrees to both suggestions.

14. Having revised the South Dalmarnock Integrated Infrastructure Framework area, I agree that it should be identified as a masterplan, and that a schedule of masterplan areas would provide clarity for users of the Proposed Plan. The Policy and Proposals Map should be modified to reflect the inclusion of South Dalmarnock Integrated Infrastructure Framework as a masterplan area, and the Proposed Plan modified by the inclusion of an appendix containing a schedule of masterplan areas.

**Reporter's recommendations:**

Modify the Policy and Proposals map to show the University of Glasgow Gilmorehill/Hillhead/Western Infirmary campus area as a single Masterplan Area, reflecting the boundary of the Campus Development Framework.

Modify the Policy and Proposals Map and Key to remove the term "Principal Retail Area" and replace it with "Principal Retail and Commercial Area".

Modify the Policy and Proposals Map by including the South Dalmarnock Integrated Infrastructure Framework as a "masterplan" area.

Include a schedule of all masterplan areas as an appendix to the Proposed Plan.

Issue 56	Diagrams	
Development plan reference:	The Plan	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
Hillhead Community Council (00479)		
Provision of the development plan to which the issue relates:	The Plan contains a large number of diagrams. The purpose of these illustrations is to promote greater use of clear, straightforward graphics in the Plan and to make the document simpler to use.	
Planning authority's summary of the representation(s):		
<u>Scale of Diagrams</u>		
<u>Objecting</u>		
00479/3/001 - City Wide Map & Map 2: Concerns that maps provided as part of the Plan are too small in scale and do not provide sufficient clarity. This may impact boundaries and decision making going forward. Concerns that specialised equipment is required in order to view the mapped material appropriately.		
00479/10/003 - The maps and illustrations provided throughout the Plan are too small and do not provide sufficient clarity. Local boundaries and areas are difficult to identify and interpret and some illustrations seem arbitrary. This makes it difficult to comment on them.		
Modifications sought by those submitting representations:		
<u>Scale of Diagrams</u>		
00479/3/001 - The Maps provided as part of the Plan should be at a larger scale and provide more clarity.		
00479/10/003 - More detailed/better scaled maps for the City and for Hillhead which can be understood and challenged. These should show exactly where developments are proposed and should include a map of listed buildings.		
Summary of responses (including reasons) by planning authority:		
<u>Scale of Diagrams</u>		
<u>Objecting</u>		
00479/3/001, 00479/10/003 - The Scottish Government recognises the advantages of online Local Development Plans in providing an easy to use interactive mapping service. The Proposed Local Development Plan has been designed with web-use in mind.		

However, it is recognised that the clarity of the Policy and Proposals Map, which, amongst other things, shows where developments are proposed, can be improved. It is considered that a recent upgrade of the Council's IT systems will help provide for a better on-line experience and enhanced clarity regarding site boundaries.

Many of the figures in the body of the Plan are diagrammatic and only intended to provide an indication of the general intent of the policies. These will not be used as the basis for making decisions on development applications. Instead decisions will take into account detailed boundaries to be set out in Supplementary Guidance (e.g. natural environmental designations (including wildlife corridors), air quality management areas, etc.), or that can be found on-line elsewhere – e.g. listed buildings or, in the case of open space, the Council's Open Space Map. It is not considered practical to show these in the Plan itself as, in many instances, they are not designated through the development plan process (e.g. listed buildings, SSSIs, etc.) and a map showing them could quickly become out-of-date.

No modifications recommended.

#### **Reporter's conclusions:**

1. The representation seeks to have the maps which accompany the Proposed Plan at a larger scale, and to have the diagrams within the Plan itself made larger and clearer. Some of the illustrations are considered to be difficult to interpret, and this has made it difficult to comment effectively. Concern is also expressed that specialist equipment might be required to view maps properly.

2. The council has prepared the Proposed Plan with the aim of having it primarily as a web-based, on-line document. An upgrade to the council's IT system will provide a better experience for those online users.

3. I found that when the maps associated with the Proposed Plan are viewed online, the scale of the maps is appropriate as the zoom function can be used. Access to the Proposed Plan online is available in all libraries, and no specialist equipment is required. The printed versions are, I agree, at a small scale but are sufficiently accurate to allow any user to understand what is being proposed for which site. I find that if the scale were to be greater on the printed versions, the maps could become unwieldy in size and less usable. More maps would be required to cover the same Plan area, making the Proposed Plan less usable.

4. The figures and diagrams in the Proposed Plan are, I find, exactly that. They do not appear to be intended to provide an exact illustration of proposals, rather they serve to broadly illustrate the policy intent of that part of the Proposed Plan. Allocations and designated sites are identified, and I agree that Supplementary Guidance will provide exact boundaries as and when required.

5. There is no modification to the Plan.

#### **Reporter's recommendations:**

No modifications.

Issue 57	Background Papers	
Development plan reference:	Background Paper 13: Green Belt Review Background Paper 4: Network of Centres	Reporter: Sinéad Lynch
Body or person(s) submitting a representation raising the issue (including reference number):		
Retail Property Holdings (RPH) (00491) Lujo Properties Ltd (00564) Shawlands Retail Ltd (00568) Mansell Homes (00587) Pollokshields Community Council (00609) Gartloch Developments Ltd In Administration (00628)		
Provision of the development plan to which the issue relates:	The Background Papers contain all the evidence and supporting background information used in the production of the Plan.	
Planning authority's summary of the representation(s):		
<u>Greenbelt Review Background Paper</u>		
<u>Objecting</u>		
00587/2/001 Mansell Homes - Seeking a change to Background Paper 13: Green Belt Review, in relation zone 4.7 (page 23). The development of this site should be subject to the most up to date environmental information available - in particular, an up to date tree survey should determine the merits of both the Tree Preservation Order across the site and the Ancient woodland designation. The Proposed Plan should encourage up to date information to be used to assess any proposal on the site, rather than relying on outdated and potentially inaccurate information.		
00628/2/001 Gartloch Developments Ltd In Administration - The site at Gartloch Farm has planning permission (subject to a Section 75 Agreement) for 300 houses. Since planning permission was granted, the site owners have gone into administration but the site is still considered deliverable. The Green Belt Review Background Paper indicates that this site should be removed from the Green Belt but that, should the development not be implemented, then the site should revert to Green Belt pending masterplanning work to determine the detailed extent of, and appropriate boundaries for, any residential development. This caveat should be deleted and replaced with new wording.		
<u>Network of Centres Background Paper</u>		
<u>Objecting</u>		
00564/1/001 Lujo Properties Ltd - The City Centre Principal Retail Area has changed over the last few years and the western end of Sauchiehall Street has become more of a focus for leisure and entertainment rather than retailing. The PRA boundary should be redrawn to include only the pedestrianised area of Sauchiehall Street and a more flexible policy should apply to the remaining part of Sauchiehall Street. Background Paper 4 seems to		



suggest this approach but is inconsistent with the Proposals Map.

00568/2/001 Shawlands Retail Ltd - For a variety of reasons, premises in the Shawlands Arcade are not lettable to retailers at even an extremely low rent. The restrictive policy that 70%-80% of the centre will be retained in retail use is now clearly no longer realistic and a more flexible approach is required which allows for a greater presence of other town centre uses within the Arcade.

00609/5/001 Pollokshields Community Council - Wishes to highlight a potential conflict between the proposed Gordon Street Avenue on Page 41 of the recent Consultative Draft City Centre Transport Strategy 2014 and the draft City Development Plan Background Paper 4, which notes that Gordon Street will no longer be designated as a level 2 Primary Retail Street. At present the retail units on Gordon Street are fully let and Gordon Street, with its interesting shopfronts, scale, good architecture and details, is an exemplar of a vibrant walkable city centre street. Gordon Street already meets the criteria set out in draft policy Policy CDP 1 The Placemaking Principle. The PCC believe retail use in Gordon Street should be supported as part of the street's character.

#### Supporting

00491/6/002 Retail Property Holdings (RPH) - The Paper proposes to retain the 70% minimum threshold for retail use within Major Town Centres, but allowance is made for some flexibility should future analysis indicate that this is not realistic. The aim is to protect retail function while introducing diversity. This approach is supported.

#### **Modifications sought by those submitting representations:**

##### Greenbelt Review Background Paper

00587/2/001 Mansell Homes - Background Paper 13 (page 23) should be reworded to indicate that the development of zone 4.7 should be subject to the most up to date environmental information available.

00628/2/001 Gartloch Developments Ltd In Administration - The last two sentences of para S5.4 in the Green Belt Review Background Paper should be deleted and replaced with:

"Should the consented scheme not be implemented, allowance will be made for alternative masterplanning of the site to reflect revised planning policy or supplementary guidance. This will not alter the removal from the green belt."

##### Network of Centres Background Paper

00564/1/001 Lujo Properties Ltd - The City Centre Principal Retail Area boundary should be redrawn to include only the pedestrianised area of Sauchiehall Street and a more flexible policy should apply to the remaining part of Sauchiehall Street.

00568/2/001 Shawlands Retail Ltd - Background Paper 4 should be modified to remove or reduce the 70% minimum threshold for class 1 retail uses within Shawlands town centre.

00609/5/001 Pollokshields Community Council - Retain the status of Gordon Street as a Level 2 Primary Retail Street.

**Summary of responses (including reasons) by planning authority:**

Greenbelt Review Background Paper

Objecting

00587/2/001 Mansell Homes - Zone 4.7 is identified in Background Paper 13 - The Green Belt Review (OC46) as the site of the former Glasgow Zoo. As acknowledged by the objector, the Carmyle/Broomhouse/Baillieston Community Growth Area masterplan identified this site for release from the Green Belt, with residential development to be integrated with trees and woodland being retained (the Masterplan Technical Appendix (OC30) - section 3.10 sets out retention proposals). Paragraph S4.8 of Background Paper 13 (OC46) provides further detail. The site is identified as housing proposal (H088) on the Policy and Proposal Map.

This site was included in the Potential Additional Sites Consultation (OC64) in late 2012. In their consultation response (OC56), SNH stated that the site 'could accommodate only limited housing development, provided it was sufficiently well-designed within the existing woodland framework'. They also drew attention to the fact that part of the woodland is identified in the national Ancient Woodland Inventory in the highest-value category: Ancient of Semi-Natural Origin, and much is protected as an L-SINC. They concluded that development would need to retain and protect significant woodland elements as an internal green network (ideally through a plan for woodland enhancement and management).

Policy CDP7 indicates that new development should not have an unacceptable effect, either directly, cumulatively on trees, woodland or hedgerows of importance, with Figure 15 providing an indication of the current extent of TPOs, Ancient, Long-established and Semi-natural woodland and Sites of Importance for Nature Conservation, amongst other things. Detailed boundaries are to be set out in Supplementary Guidance that the Council will bring forward to support this policy. The policy further indicates that the SG will be updated, in due course, to reflect a proposed review of site boundaries and justifications. This could result in the amendment of site boundaries for the TPO and SINC, should more up-to-date survey information support such an approach. It should be noted that the boundaries of Ancient, long-established and semi-natural woodland are not established by the Council.

The idea that a development proposal should be informed by accurate, up-to-date information is one that is supported. However, it is considered that this is a matter that is best considered during discussions on the development proposal, though the development management process, and that there is no need to specifically address it in the Plan or Background Paper 13 (OC46).

No modifications recommended.

00628/2/001 Gartloch Developments Ltd In Administration - This site falls within the Easterhouse/Gartloch/Gartcosh Community Growth Area search area as identified in City Plan 2. Paragraph 3.31 of City Plan 2 (CE17) indicates that each of the CGAs will require to be the subject of a masterplanning exercise and that the masterplans will require to

consider, in more detail, the physical and environmental constraints affecting these areas. This would help inform the identification of appropriate development sites within these areas, including any necessary mitigation measures.

Paragraph S5.10 of the Green Belt Review (OC46) indicates that the Gartcosh/Gartloch Site Selection and Development Guidance Final Report (the “2010 Study” – site 2, page 45) (OC43) identified a site in this area as having the potential to accommodate development (shown as Zone 5.2 on Map 10 of the Green Belt Review). However, the 2010 Study also recognised that planning permission had been granted (subject to a planning agreement being entered into) for a residential development of 300 houses on the western part of Zone 4.2. As a result, it was not subject to further examination in the 2010 study in the same way as the other masterplan sites in this CGA area.

Development has not yet started on site and, as noted by the objectors, the owners have gone into administration. The Green Belt review (OC46) recommended release of the site from the Green Belt on the basis that planning permission had already been granted for development on the site, albeit subject to the signing of a planning agreement. The 2010 Study (OC43) has suggested that there was likely to be scope for development at this location, and that is not disputed. However a masterplanning approach, consistent with the approach taken in the other Study sites, may result in the identification of a development footprint different to that currently proposed for removal from the Green Belt. Such an approach is preferred, for consistency, and would provide for consideration against the most up-to-date national and local policy context. It may result in a different Green Belt boundary and, on this basis, it is considered that the last two sentences of Background Paper 13, paragraph S5.4 (OC46) should be retained.

No modifications recommended.

#### Network of Centres Background Paper

##### Objecting

00564/1/001 Lujo Properties Ltd - The Council agrees that a more flexible approach is justified in the area of Sauchiehall Street to the West of the pedestrianised area which is designated in the Adopted City Plan as a Principal Retail Area and a Primary Retail Street. However it is considered that sufficient flexibility can be achieved by removing the Primary Retail Street designation from this part of the Street whilst retaining its status within the Principal Retail Area. Primary Retail Streets will be shown in Supplementary Guidance and it is the Council's intention to remove Primary Retail Street status from this part of Sauchiehall Street. However, Primary Retail Streets are not shown on the Policy and Proposals Map and, since the Council does not consider that the area covered by the Principal Retail Area should change, it is recommended that no modifications are made on this matter.

However, it is considered that the term 'Principal Retail Area' does not reflect the full range of uses that exist in the City Centre. As such, changing the term 'Principal Retail Area' on the Policy and Proposals Map to 'Principal Retail and Commercial Area' would provide greater clarity.

The Reporter could, if so minded, amend the Policy and Proposals Map by deleting the term 'Principal Retail Area' and replacing it with 'Principal Retail and Commercial Area'.

00568/2/001 Shawlands Retail Ltd - The Plan itself does not specify a percentage threshold of retail uses. The Plan contains policies which operate at a strategic, City wide level, and in accordance with national policy, a lot of the detailed policy guidance that was incorporated within City Plan 2 will be incorporated within a suite of Supplementary Guidance that will accompany the Plan.

This new suite of Supplementary Guidance will be subject to public consultation and made available prior to Plan adoption.

No modifications recommended.

00609/5/001 Pollokshields Community Council - City Plan 2 designates Gordon Street as a Level 1 Primary Retail Street where 100% retail use is the requirement. In recent years, the street has become increasingly characterised by a mix of retail and non-retail uses and consequently it is considered appropriate to remove this status. However, Primary Retail Streets are not shown on the Policy and Proposals Map and the appropriate change will be made in the forthcoming Supplementary Guidance.

No modifications recommended.

### **Reporter's conclusions:**

#### Green Belt Review Background Paper

#### Zone 4.7 (site of former Glasgow Zoo)

1. The representation is seeking to have the area of Zone 4.7 specifically identified as requiring the most up to date environmental information available before development decisions are made. Presently, the site is identified for release from the green belt and identified as Housing Proposal H088 in the Plan, as part of a larger Community Growth Area.
2. During the potential additional sites consultation in 2012, Scottish Natural Heritage as a consultee concluded that development would need to retain and protect significant woodland elements as an internal green network (ideally through a plan for woodland enhancement and management). Part of the site is identified in the national ancient woodland inventory in the highest-value category: ancient woodland of semi-natural origin, and much is protected as a local site of importance for nature conservation (SINC).
3. The council intends to produce Supplementary Guidance (SG) which will set out the detailed boundaries of each designation, and considers that to address this specific site in advance of the latest information would be inappropriate for the Proposed Plan and should properly be discussed through the development management process.
4. I find that it would be beneficial to have a greater level of detail when major allocations are proposed in the Plan but are not accompanied by the detail that will determine capacity and site boundaries. However, the council is not obliged to produce SG in conjunction with the Proposed Plan, but can produce it afterwards if it is justified by the policy content of the Proposed Plan. In this instance, the proposed SG will not be available for public comment until after the Proposed Plan has been examined and adopted. I agree that without the detailed guidance on such sites as Zone 4.7, there is limited clarity at this point in time for both communities and developers. However, this is

not a matter that can be resolved through the Proposed Plan examination process, where I can only have regard to the material forming part of the Proposed Plan as submitted for examination. Any SG prepared to form part of the Proposed Plan at a later stage will follow the appropriate public consultation period, at which point submissions can be made. I do not consider it appropriate to modify the Proposed Plan as requested, as I find that the production of the appropriate SG should resolve the representations.

### Gartloch Farm

5. The representation is seeking to ensure that the site is removed from the green belt in the Proposed Plan, should development not proceed. The site currently has planning permission for residential development, and is within a Community Growth Area.

6. The council considers that this site was not evaluated in the same manner as the other masterplanned areas in the Greenbelt Review, as it already had planning permission for 300 homes. The Greenbelt Review concluded that there is scope for development in the area including the subject site, and that it should be released from the green belt. A masterplan may find a different green belt boundary appropriate in this area, and so the council wishes to retain the flexibility of the site reverting to green belt should development not proceed.

7. I note that the site has a valid planning consent for 300 homes, and that the council would have considered the impact on the green belt when determining the planning application. The Greenbelt Review considered that the site could be removed from the Green Belt and that development could be accommodated in this area. It is acknowledged that a masterplan has not been prepared for the site, but planning permission has been granted and I conclude that should imply a similar status.

8. The ownership, and financial position of any owner, is not material. The falling into administration of the owner does not imply that the site cannot be delivered; nor should it be construed to mean that the site is constrained. It does not change the fact that the site is considered suitable for development in the Proposed Plan.

9. Masterplanning for the Community Growth Area may or may not result in a different Green Belt Boundary in this location. I find that it is not appropriate to speculate on the possible outcomes of studies that have not yet been carried out, when the Greenbelt Review and development management decisions clearly indicate that it is appropriate to remove the site from the green belt.

10. However, this is not a matter that can be resolved through the Plan examination process, where I can only have regard to the material forming part of the Proposed Plan as submitted for examination. Any Background Papers that were prepared to inform the preparation of this Plan do not actually form part of the Proposed Plan, and so suggested modifications to them cannot be made. There is no modification to the Proposed Plan.

### Network of Centres Background Paper

#### Principal Retail Areas

11. The representation sought to have the City Centre Principal Retail Area boundary amended to include the pedestrian part of Sauchiehall Street only, with the remainder of the street having a more flexible policy applied to it in terms of the proportion of retail

floorspace. The same concern is raised under Issues 11 and 15, and so there is no need to repeat my conclusions here.

### Shawlands Arcade

12. The representation seeks to remove or reduce the 70% minimum threshold for class 1 retail uses within Shawlands town centre, as set out in the Background Paper, and to permit a greater percentage of other town centre uses.

13. The council says that although the Background Paper sets out percentage thresholds, the Proposed Plan does not. New SG will be prepared with details for the retail centres, and will be available for public consultation.

14. I find that it would be beneficial to have a greater level of detail when major allocations are proposed in the Proposed Plan but are not accompanied by the detail that will determine capacity and site boundaries. However, the Council is not obliged to produce SG in conjunction with the Proposed Plan, but can produce it afterwards if it is justified by the policy content of the Proposed Plan. The SG will offer an opportunity for consultation at which point submissions can be made. I do not consider it appropriate to modify the Proposed Plan as requested, as I find that the production of the appropriate SG should resolve the representations.

### Gordon Street

15. The representation seeks to ensure that Gordon Street continues to be retained as Level 1 Primary Retail Street, where 100% retail use is the policy requirement in City Plan 2. The street is considered to be vibrant, and retail units are fully let.

16. The council considers that the street has changed in recent years, and now reflects a mix of uses. It considers it appropriate to remove the Level 1 status, and intends to do that in the proposed SG.

17. Having visited the area, I find that the street is a busy and thriving urban street with appropriate retail uses. Not all units are in class 1 use, and there clearly have been a number of changes to units in terms of occupiers and types of uses such as cafes, etc. However, the decision whether or not to remove the Primary Retail Street designation will be taken in Supplementary Guidance, when there will be an opportunity to make comments. There is no modification to the Proposed Plan.

### **Reporter's recommendations:**

No modifications.