

Additional Potential Locations for Development Consultation Responses

No site - general comment

Sandra White MSP

206 /

804 No site - general comment

The proposed sites are around the city boundary, and as they do not directly affect my Kelvin constituency I wish to comment on a general basis rather than in response to the individual sites.

I would however like to state my concerns about the continuing erosion of Glasgow's greenbelt, while there is no shortage of brownfield spaces and gap sites within the city, which although more expensive to redevelop would be a more appropriate priority. Aside from the clear environmental benefits of protecting our city's greenbelt, there are social and economic benefits from appropriate development on the many vacant spaces within the city, including within my own constituency.

I strongly believe that the Local Development Plan should provide the basis for enhancing our existing communities, and that there must be a significant presumption against the creation of new communities on the fringes of the city.

Stuart McMillan

Renfrewshire Council HQ

305 /

787 No site - general comment

Renfrewshire Council welcome the opportunity to provide comments on the review of the Glasgow City green belt boundary along with the identification of potential locations where the green belt boundary could be amended. Having reviewed the potential locations for development we have no comments to offer.

Adele Gallagher

Scottish Water

523 /

861 No site - general comment

Thank you for giving Scottish Water the opportunity to review the above additional sites for your Local Development Plan. Please note that Scottish Water has no further comments to add at this time.

Although we are not local to the sites suggested, we wish to object to the requirement for Glasgow to find a "generous" supply of new development land in the Development Plan. We understand by this that the land so required should not have been previously developed.

It is obvious that the Scottish Government has no understanding of the position of Glasgow when it issued the dictat to local authorities. We would be very happy for the view of this Community Council to be made to the Scottish Government if you wish to do so..

Glasgow has very tight boundaries which do not allow expansion into the areas separating it from other authorities. It is most undesirable that there should be urban spread of this kind. It also goes against current town planning thinking and the need to conserve agricultural land, either existing or potential. Glasgow also needs to conserve all the areas of green and open space within the city boundaries, as lungs for the population, to improve health and to make the city function well as a place to live and work.. We certainly approve any extension of, or additions to, such spaces.

However, within Glasgow there are many brownfield sites which should take priority for development. Developers will always want new green sites as they are the easiest and least expensive to develop. Pressure from developers has clearly influenced the government, but it is our view that Glasgow should hold out against this short-sighted pressure.

We also wish to see more social housing in the mix of tenures: this is much less likely if the land available to developers is extended furth of the city boundaries or into green/open space. We consider that social housing is a priority given the current economic climate.

Any issues of contamination should clearly be dealt with. A government programme of assistance would help if developers are arguing that they cannot afford to do it. The scheme for improving spaces awaiting development has had a positive impact on changing perceptions of these spaces, but it alone is insufficient.

There are other issues: areas already settled as residential should have their interests taken into account too. Increasing pressure on some transport nodes is beginning to be unviable. Derelict industrial sites should be developed to take these considerations into account too.

I am totally opposed to any change in the current Green Belt. There are significant areas of 'Brownfield' within the city and its environs which would provide a much more suitable location for housebuilding - without damaging the Green Belt. I appreciate that developers prefer Greenfield sites which offer higher profit margins. But this consideration should not be allowed to outweigh the importance of preserving the green space at the borders of our city.

Once you have allowed Green Belt to disappear, it's gone for good.

I urge you not to amend the Local Development Plan in this irresponsible and short-sighted manner.

INVALID - WITH REGARD TO SITES NOT SUBJECT TO THIS CONSULTATION

Very much opposed to the release of green belt land to allow any housing developments around Carmunnock Conservation Village.

Carmunnock Community Council register a strong objection to the possibility of releasing Green Belt Land, PH1 and PH2, on Cathkin Road on the perimeter of the Village. The site is currently grassland and in use by a local farmer for his cattle. It is also on the edge of Coulter's Wood which is of increasing importance as a natural habitat for wild life. Introducing additional housing in that area would have a detrimental effect.

Cathkin Road is a narrow country road with several very sharp bends in the vicinity of the proposed sites and since this is the access road to Cathkin Braes it would undoubtedly have an effect on road safety. It is proposed to build 32 houses on 5 acres followed by the second phase on 25 acres. This could represent, probably, an additional 200 cars. Many of these cars would travel through Carmunnock Village, a Conservation Village which is designated a "Quiet" area by GCC. The increased traffic on narrow Village streets must constitute a safety hazard.

Two years ago GCC published City Plan 2 which stated, in relation to Cathkin Road PH1 & 2, "the Strategic Development Plan concludes that private housing supply across SDPO is more than sufficient to meet demand in the private sector up to 2025". In the same document the additional statement was made "release for housing on this prominent site is not justified due to environmental heritage and public transport considerations - to remain as DEV 12 Green Belt." We would urge GCC to be consistent and adhere to the above statements since there is no advantage in further reducing the Green Belt.

We have always accepted the policy of infilling spare sites in the Village but this proposal for PH1 & 2 is outside the recognised perimeters of the Village and would, in effect, create a mini village on Carmunnock's outskirts. It would, potentially, increase the number of houses by about 30% which would create a strain on local facilities. It is difficult to see any valid reason for this development and we would urge GCC to support their Policy on DEV 12 and reject this application.

All our native bats are European Protected Species. They are protected under the Conservation (Natural Habitat &c) regulations 1994 as amended and The Nature Conservation (Scotland) Act 2004. Bats and their roosts are protected under the Habitats Regulations. Roosts are protected even when bats are not seasonally present. In addition the Nature Conservation (Scotland) Act 2004 places a biodiversity duty on all public bodies to further the conservation of biodiversity and recognises all native bats as "species of principal importance for biodiversity conservation".

Government planning policy guidance throughout the UK requires local planning authorities to take account of the conservation of protected species when determining planning applications. The presence of a protected species is a material consideration when assessing a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. This requirement has important implications for bat surveys as it means that, where there is a reasonable likelihood of bats being present and being affected by the development surveys must be carried out before planning permission is considered. In Scotland National Planning policy Guidance (NPPG) 14 and Planning advice Note (PAN) 60PPS 2 are relevant.

Mark Harrison

The Coal Authority

567 /

828 No site - general comment

As you will be aware, coal resources are present within Glasgow, and the area has been subjected to coal mining which will have left a legacy. By way of illustration, within Glasgow there are approximately 930 recorded mine entries.

In terms of these potential site allocations, it would therefore be prudent to include a criterion which assesses the coal mining legacy GIS data that we provided to your Development Management team in October 2011 and recently reissued in June 2013. This would be a due diligence check to ensure that potential development sites do not contain any mine entries or other coal related hazards which would require remediation or stabilisation prior to development. Some of the additional potential locations for development are affected by coal mining legacy hazards.

However, I would emphasise that former mining activities and related hazards are certainly not a strict constraint on development; indeed it would be far preferable for appropriate development to take place in order to remove these public liabilities on the general tax payer. The Coal Authority would therefore not wish to suggest that any potential sites should be excluded from allocation through the LDP on the grounds of former mining legacy issues.

In addition, an assessment should be made of the likely impact of the additional potential locations for development on mineral resources, including coal. GIS data illustrating the spatial extent of surface coal resources in Glasgow was initially provided to your authority in January 2010 and recently reissued in June 2013. This will help to ensure that any potential sterilisation effects (along with whether prior extraction of the resource would be appropriate) are properly considered in line with the guidance in SPP, paragraph 241.

Katharine Rist

The Woodland Trust

568 /

829 No site - general comment

We would encourage that the review of Green Belt boundaries be undertaken with the benefits of ancient woodland retention, woodland access and woodland enhancement in mind. We note the following points of policy as relevant:

- The Glasgow and Clyde Valley Forest and woodland strategy which identifies an increase in woodland cover within urban areas and a very significant increase around the urban fringe as a priority.
- The Scottish Government's control of woodland removal policy which includes a presumption in favour of protecting woodland resources.
- Scottish Planning policy encouraging the linking of open spaces to habitat networks prevention of further fragmentation or isolation of habitats and identify opportunities to restore links which have been broken.
- The Scottish forestry Strategy commitment to expanding and improving the quality of woodlands around settlements.

We hope that a review of the Green Belt sufficiently addresses the requirement that previously developed land be used in preference to greenfield sites. Glasgow has a greater potential for development on previously used sites than other areas and it would be unfortunate for these areas to not be used in favour of areas that affect that viability of ancient woodland.

Green belt designation should provide clarity and certainty on where development will and will not take place. For this and the reasons above we request that any changes to the green belt be carried out cautiously and within the context of wider habitat networks.

Glasgow Natural History Society

571 /

849 **No site - general comment**

We have a more general concern that the ever-increasing number of housing developments, which the City Council say are 'required', inevitably eat into greenspace / greenbelt; and this seems to be happening rather gradually, but progressively, so greenspace looks increasingly constricted - particularly the spaces of high biodiversity, which do tend to be around the edges of the City. At the same time smaller areas of greenspace within the main conurbation are also subject to development pressure, though many of them are oases of biodiversity, and form part of the Green Network through the city, as well as providing some relief from brick and stone for the general public in those areas.

The comments in the previous paragraph may not be pertinent to this particular consultation, but we very much hope they will be used to inform the new City Plan in general.

Glasgow Natural History Society

571 /

850 **No site - general comment**

We are also generally concerned about the development pressure around the Dams to Darnley Country Park. This pressure is coming both from Glasgow and East Renfrewshire Councils - in the context of this consultation, the assessment of the area at Corselet Road, Darnley is of concern.

Margaret J Toppin

Carmunnock Preservation Society

575 /

865 **No site - general comment**

INVALID - WITH REGARD TO SITES NOT PART OF THIS CONSULTATION

I write on behalf of Carmunnock Preservation Society Committee regarding the potential location for development of land from the Green Belt, specifically Cathkin Road PH1 & 2, for residential housing.

We wish to register our strong objection to this proposed development.

City Plan 2 (2011) makes a strongly worded reference as follows, "the Strategic Development Plan concludes that private housing supply across SDP is more than sufficient to meet demand in the private sector up to 2025" (see - LDP for Glasgow MIR, item 2.9, p12). Why change this view within 2 years? Specific reference is made, in City Plan 2, to Cathkin Road PH1 & 2, "release for housing on this prominent site not justified due to environmental heritage and public transport considerations - to remain as DEV 12; Green Belt". What has changed? We fully support the above view.

Environmental issues. The location is grass farmland close to housing and close to the designated Cathkin Braes Country Park which is used by large numbers of walkers, cyclists on the mountain bike trail and horse riders. It is also an area of natural beauty supporting diverse forms of wildlife and fauna and adjacent to Coulter's Wood which is a natural wildlife habitat. The City's avowed position to protect habitats and provide for movement of species would be seriously eroded by featuring this location as a potential for development.

The suggested number of houses is very high and would impact on transport. Cathkin Road is a narrow country road with sharp right hand bends close to the site and increased traffic would have a detrimental effect on road safety on Cathkin Braes and in the Village of Carmunnock. Carmunnock is a conservation village with a number of 17th and 18th century cottages close to the main route through the village. The fragile, shallow, foundations of these houses would be severely at risk if traffic is increased.

Carmunnock is unique as the last village within the City of Glasgow and thus part of the historic environment and character of the City. Carmunnock Preservation Society would be deeply concerned if this release of DEV 12 Green Belt land goes ahead and expect Glasgow City Council to uphold their stated objection and confirm their policy of DEV 12.

Prop0078 North West of Kerfield Lane, Drumchapel

Carol A. Gilbert**Strathclyde Partnership for Transport****529 /****862****Prop0078 North West of Kerfield Lane, Drumchapel**

Taking accessibility by public transport as the only criteria, site proposal 78 has a basic level of public transport accessibility by bus only.

Lynne Anderson**Scottish Environment Protection Agency****534 /****855****Prop0078 North West of Kerfield Lane, Drumchapel**

We have no objection to the allocation of this site on flood risk grounds.

Judy Wilkinson/Elizabeth Stewart**Scottish Allotments and Gardens Society/Glasgow Allotments Forum****535 /****841****Prop0078 North West of Kerfield Lane, Drumchapel**

The loss of further green belt in Drumchapel causes us concern. We are not sure of the quality of the land but if any is uncontaminated it should not be developed. The agenda and over-arching proposals for food security, sustainable communities especially in terms of health and well being together with climate change concerns should all be taken into consideration. Brownfield sites should be developed before Greenbelt is lost. There is a need for more growing and allotment spaces and no potential growing land should be lost.

Martin O'Hare**West of Scotland Archaeology Service****556 /****792****Prop0078 North West of Kerfield Lane, Drumchapel**

This plot is located immediately adjacent to the buffer area defined in relation to the Antonine Wall, which is a World Heritage Site and is also legally-protected as a scheduled monument. Although the boundaries of the proposed greenfield release do not extend into the buffer itself, its proximity to this internationally-important monument would mean that consideration would need to be given to the effect of any development on the setting of the wall, and on that of the scheduled Roman fortlet in the area to the west of Cleddans Farm. Although modern buildings are already present on the higher ground to the south of the potential area of greenfield release, the land slopes downwards between Kerfield Lane and Lillyburn Place, suggesting that any new housing on this section of the plot would be prominently visible from the World Heritage Site. I am aware that the ground to the north and east of the plot was formerly occupied by buildings fronting onto both Lillyburn Place and Achamore Road, and it is likely that the construction and subsequent demolition of these structures will have had a detrimental impact on the potential for buried archaeological deposits to survive below ground level in these areas. The plot itself does not appear to have been substantially disturbed by development during the modern period, meaning that it may retain the potential to produce buried deposits associated with earlier phases of occupation, though this potential may be limited to some extent by the sloping nature of the ground. Combined with the relatively small scale of the plot, this could suggest that the potential for the development of this site to have a direct impact on buried archaeological material is likely to be reasonably limited, though its proximity to the Antonine Wall means that it should not be discounted. In addition, the importance of the Antonine Wall as both a scheduled monument and a World Heritage Site means that the indirect effect on the setting of this feature should be a consideration in any impact assessment process.

Virginia Sharp**Historic Scotland****560 /****802****Prop0078 North West of Kerfield Lane, Drumchapel**

This potential site is adjacent to the Antonine Wall World Heritage Site buffer zone. We are content with the principle of housing development in this location as we consider that robust application of national and appropriate local policies should be able to mitigate any potential adverse impacts.

Derek Manson

Scottish Natural Heritage

562 /

810 Prop0078 North West of Kerfield Lane, Drumchapel

This site does not appear to have capacity for housing development because of the range of benefits it provides to local people and to people moving to new settlements in the vicinity. We suggest this is designated as Greenspace and the Green Belt edge is re-located to the woodland blocks just west of the site.

We understand from Alan Duff that the cleared Lilyburn Place / Fasque Place site is unlikely to be redeveloped for housing during the lifetime of the LDP. The metal fence around that site provides a poor Green Belt boundary and the area would greatly benefit from a more robust edge. The existing Green Belt has a strong agricultural character. It provides important glimpses of the Kilpatrick Braes through the Cleddans Burn valley, including in views from within the potential Green Belt release site.

The potential release site provides a green wedge which appears well used for informal recreation. It provides access to Green Belt areas beyond, including the Cleddans Burn path routes managed by Forestry Commission Scotland. These are important Green Network functions, which benefit existing residents and would benefit the Lilyburn Place / Fasque Place site if redeveloped. Given the small size of the site and its steep topography we suggest the best option may be to designate the site as Greenspace and, through on-going management by Forestry Commission Scotland, re-locate the Green Belt edge to the woodland blocks west of the site.

Anne Youngman

Bat Conservation Trust

564 /

820 Prop0078 North West of Kerfield Lane, Drumchapel

Electricity sub-station has potential to be a bat roost; these buildings are often very warm and if suitable gaps are present may be used as maternity roosts. (Note a bat can squeeze through a gap 1cm x 2cm). If there is a substation and if it is to be demolished a bat survey should be carried out first. There are likely to be bats in neighbouring houses. Bats will feed over the scrubby vegetation in this area.

Katharine Rist

The Woodland Trust

568 /

830 Prop0078 North West of Kerfield Lane, Drumchapel

Exclusion of this small site is stated to help provide a stronger green belt boundary. The site is in close proximity to a number of patches of woodland comprising Drumchapel Woodlands adjacent to the West and slightly further away in the East. The site itself does not contain woodland but does have the potential for an increase in woodland on the site.

The loss of potential for this site could be mitigated by the addition to the Green Belt of land on the North side of Lilyburn Place which could provide greater opportunity for connectivity between the two parts of the existing woodland.

Glasgow Natural History Society

571 /

847 Prop0078 North West of Kerfield Lane, Drumchapel

We have strong concerns about the potential developments NW of Kerfield Lane on account of the impact directly or indirectly on the designated areas included or close by. In addition a development near Kerfield Lane would further interrupt the Green Network extending from Bearsden through Garscadden Wood (and its eastward extension) and through to Cleddans Burn and the associated SINCs, which are important for water-voles, amphibians and invertebrates.

Clare Darlston

Scottish Wildlife Trust

576 /

869 Prop0078 North West of Kerfield Lane, Drumchapel

No comment on this proposal.

Richard Todd**East Dunbartonshire Council****10 /****856 Prop0079 Summerston**

In our previous submission relating to the original site boundary it was stated that there would be no obvious visual impact on existing residential areas within East Dunbartonshire. However, as the revised boundary of this proposed development site now adjoins the local authority boundary at the south west part of Bishopbriggs, there is potential for coalescence with the Milton area in Glasgow City Council. It is the view of East Dunbartonshire Council that this part of the greenbelt should be strongly protected to maintain a clear separation between the northern edge of Glasgow City and the boundary with East Dunbartonshire.

There are also a number of environmental constraints associated with the revised boundary. In particular a Local Nature Conservation Site (LNCS) is designated in the area south and west of Bishopbriggs Golf Course, which is also part of a designated 'Historic Garden and Designed Landscape' associated with Kenmure House. It is clear that the environmental quality of this LNCS extends to the area within Glasgow City, and as such, East Dunbartonshire Council is strongly of the view that development in this area would be inappropriate.

It is considered that the expanded development sites would have a significant impact on the viability of the Glasgow North Community Growth Area at Robroyston, as identified in the Strategic Development Plan. As stated in our previous consultation response, delivery within this CGA would be compromised should additional land in the north of Glasgow be released from the greenbelt. The expanded areas subject to this consultation would significantly increase the likelihood of this outcome.

East Dunbartonshire Council is therefore strongly opposed to the potential release of additional greenbelt land at either location as this would conflict with the Strategic Development Plan's vision of "maintaining a sustainable compact city-region" aimed at minimising the carbon and development footprint. Instead, East Dunbartonshire Council would continue to support the prioritisation of brownfield development across the city region. These are more sustainable in the long-term than small scale Greenfield release sites. Greenfield release should only be considered after brownfield opportunities have been exhausted and currently identified Community Growth Areas have been built out.

Sandra White MSP**206 /****805 Prop0079 Summerston**

To single out one proposal, I would be disappointed if any significant new development areas were approved under the huge swathe of land being considered under Prop0079.

NOTE: COMMENTS MAINLY IN SUPPORT OF THEIR PREVIOUS PROPOSAL 52 AT SUMMERSTON.

Following the publication of the Potential Locations for Development document, further work has been undertaken in respect of a Revised Landscape and Visual Appraisal Report and Engineering Appraisal Addendum. This further work has demonstrated that the housing site is deliverable, effective and could be brought forward within the short-medium term.

There are a number of potential benefits as identified by the masterplan to the local community and Glasgow North by the allocation of land in the Proposed Plan for further development at Summerston. These include the following:

- the provision of additional owner occupation housing and attracting new families to the area, as well as providing greater choice and opportunity for existing residents
- additional investment in the local community by providing new family homes
- the provision of local community facilities
- the potential to improve the local infrastructure and accessibility
- the provision of a potential bus route through the site
- the potential to facilitate the improvement of the Balmore Road/Blackhill Road junction from a Phase 1 development
- the potential to provide pedestrian links connecting to the Kelvin Walkway, a green corridor to create amenity walkways and enhance biodiversity and public access into the Greenbelt
- land for potential cemetery extension
- given the extent of our client's land ownership interests, additional land could also be reserved for additional community and social infrastructure and
- assuming development, there is the prospect of a new Milton Relief Road/Northern Distributor Road with associated benefits

It is considered that many of the aspirations of the greenbelt can still be met in developing this site, indeed its accessibility could be enhanced and greater management secured by development. There is a substantial depth of greenbelt at Summerston.

We are of the opinion that the Council should identify further land from the green belt to ensure an effective land supply. There is a reliance by the Council on the Community Growth Areas and their deliverability in questionable.

The development of this site offers an excellent opportunity to regenerate Summerston and Glasgow North. This would also help to support the need and proven demand for new housing within Summerston and Glasgow North.

It is considered that the site should be included as a housing site within the Proposed Plan together with the Milton Relief Road/Northern Distributor Road as and when the Proposed Plan is published later this year.

Further submissions accompany.

Lorraine Jones

Sport Scotland

478 /

817 Prop0079 Summerston

In commenting on this site our focus is on the environmental objective, as identified in the consultation, of the protection of green space and access. This accords with the purpose of Green Belt as outlined in the SPP of providing for access and outdoor recreation.

We support the findings of the Interim EIA which recognises the need to protect core paths that cross the site. We note and support your position to provide a 50m buffer zone for core paths. Paragraph 150 of the SPP is clear that core paths and other important routes should be protected and it is important that all important access routes, in addition to core paths, are protected and incorporated into any future development. We note that both the River Kelvin and the Forth and Clyde Canal run through or adjacent to the site. It is important that the access and recreational value of these assets is fully understood. As well as providing resources for walking and cycling they also provide opportunities for water recreation. The extent of such use should be fully assessed and retained as part of any development of the site. Opportunities to consider developer contributions to put towards the upgrade of paths or the provision of access points to the water should be considered. It should be noted that Scottish Natural Heritage have identified the River Kelvin walkway as a potential access spur into Glasgow from the John Muir Way. It will be useful to consult with SNH on their aspirations for this route. In addition it will be important to speak to Scottish Canals and their aspirations for sport and recreation on the canal and as it passes through the site.

An assessment of horse riding in the area should also be carried out.

Improved access to and around Possil Loch should be considered, especially that which helps take visitor pressure away from the most sensitive parts of the loch.

The area to the East of Balmore Road is less agricultural in nature and has a number of paths that criss cross the site. This suggests that the land is a well used local green resource. In developing this part of the green belt it will be important to retain some areas (in addition to paths) as distinct areas of open and greenspace, to compensate for their wider loss.

Toby Wilson

RSPB

488 /

797 Prop0079 Summerston

We are concerned that the development of this site could lead to impacts on Possil Marsh SSSI, which is designated for its mesotrophic lochs features. The site is also a Scottish Wildlife Trust nature reserve. Development of the area close to the SSSI could potentially cause hydrological changes and lead to pollutants running into the site, which may have adverse impacts on it. Furthermore, the loss of adjacent habitat as a result of the development could constrict the movements of species that use the SSSI and adversely affect the wildlife interests through isolating populations. Finally, we believe the rough grasslands to the north and south of Blackhill Road are of local value and so the loss of them would be regrettable.

Further surveys and assessment work would be required as part of any application, however, for the reasons given above, we believe this is not an appropriate site for a development of this scale and as such should not be included within the Glasgow Local Development Plan.

I write to note my concerns about this proposal to release further greenbelt land for residential development. I recognise the obligations placed on the Council by the Scottish Government in identifying land for housing development. However, I have a number of concerns about Prop0079. This area of Greenbelt land has already seen release of Greenbelt land in recent years, and also the proposal, Prop0052 (to which I have previously lodged my concerns).

This proposal is beyond the previous site of release of Greenbelt land in this area. At the time of that release, it was made clear that that was to be the maximum release in this area of the city. I see no reason to deviate from that position at this time.

The proposed site's proximity to Possil Marsh SSSI and the Antonine Wall site make it in my view unsuitable for residential development.

Further development in this area could place further demand and stress on local services.

I also have concerns about the suitability of the area for residential development because of the potential problems with drainage and risk of flooding. I am aware of flooding already experienced in Blackhill Gardens at a time of heavy rainfall.

There are other areas of non-Greenbelt land in the North of the city that could be suitable for development without releasing this Greenbelt land for development beyond the area previously agreed to be the most suitable boundary for development in this area of the city.

I wish to object in the strongest possible terms to the proposal to release additional greenbelt areas within my constituency for development.

It is my belief that the proposals outlined in the development plan for the areas adjacent to Summerston and Milton contradict the stated environmental objectives of the development plan.

As you will be aware, a number of areas of greenbelt land in the north of my constituency in the vicinity of Summerston have been released in recent years. I had understood at that time that no further land in the area would be considered for development. I would suggest that there are a number of reasons why such a release would be unwise:

The main access road to these areas is Balmore Road. This road was not designed for the volume of traffic which now uses it to access the city centre. The new developments along the Blackhill Road together with a number of developments in East Dunbartonshire have made this an extremely busy road particularly at peak times. There are no traffic lights or other traffic management aids along its length until the junction with Skirsa St, meaning that commuters from Blackhill Road have to emerge onto a busy road with a 40 miles per hour speed limit to access Balmore Road. In addition Balmore Road itself is regularly flooded (about which I will say more later) and impassable several times a year as drainage runs off the cemetery and on to Balmore Road. Traffic through Lambhill and into Possil is already heavy at peak times as commuters make their way from Balmore Road into the City Centre and the roads in these locations are not suitable for additional traffic.

The area being proposed for release is adjoined by the Antoine Wall on one edge, the site of the former landfill tip on another and the Possil Marsh SSI and the Forth & Clyde Canal on a third. All of these important markers surely suggest that more building in these areas is not sensible and in the case of the Antonine Wall and Possil Marsh could be detrimental to these important landmarks. I have always understood that the site of the former tip could not and would not be built upon and I would seriously question how close to it one would wish to build.

As already mentioned Balmore Road floods regularly, to the point of being impassable, when there is heavy rain. I am also aware of flooding in the Blackhill Gardens (newbuild) area and in Scaraway Street in Milton. The latter has been identified by Scottish Water as being caused by insufficient drainage capacity. It is my belief that additional building in this area would have the potential to exacerbate the existing problems or possibly to create new ones.

I would also be concerned that the greenbelt buffer between the Glasgow City Council area and that of East Dunbartonshire were further reduced as it would erode the unique identities of these two areas. In addition the existence of greenbelt land provides some vital accessible space for local residents. Given the low ranking which both Possil and Milton enjoy on the SIMD scale it seems to me to be important that there is green space in the area.

For many years I have urged the City Council and the various agencies with an interest to develop the many brown field sites which exist in Milton. There are large tracts of land in Milton and in Possilpark and further south in Hamiltonhill where large scale demolition of housing in the past thirty years has left vast areas of waste land which could more easily be developed and where development would aid the regeneration of these areas. Given that Milton, Possilpark and Hamiltonhill are all closer to the City Centre the travel distance for new residents would be reduced and would development there would assist the City to reduce its emissions levels.

It seems to be therefore, that the existing proposals should be recast to make the best possible use of the existing brownfield land rather than to remove some of the last remaining green belt land on the northern edge of the City boundary.

Carol A. Gilbert

Strathclyde Partnership for Transport

529 /

863 Prop0079 Summerston

Taking accessibility by public transport as the only criteria, the part of site 79 that is being considered in this consultation for the first time is currently not accessible by public transport. SPT would not support the development of site 79 as it does not have access to a basic public transport accessibility service. This development site is likely to require a private car to access and as such we would suggest that it is not considered for development as it is likely that development of the site would result in unsustainable travel behaviour.

Lynne Anderson

Scottish Environment Protection Agency

534 /

854 Prop0079 Summerston

Part of the allocation potentially at medium to high risk of flooding (fluvial) (Within or adjacent to indicative 1 in 200 flood outline) or at flood risk from another source. Potential development of allocation could increase the probability of flooding elsewhere. Forth & Clyde Canal within allocation and could represent a residual flood risk in the event of infrastructure overtopping or failure. The allocation of this site would result in an increased level of residual risk. We will require a FRA / other relevant additional information to be submitted at the planning application stage so that the risk posed by minor watercourse that passes through the site can be fully assessed. Areas near the watercourse may not be available for development.

Judy Wilkinson/Elizabeth Stewart

Scottish Allotments and Gardens Society/Glasgow Allotments Forum

535 /

840 Prop0079 Summerston

The loss of further green belt in Summerston causes us concern. We are not sure of the quality of the land but if any is uncontaminated it should not be developed. The agenda and over-arching proposals for food security, sustainable communities especially in terms of health and well being together with climate change concerns should all be taken into consideration. Brownfield sites should be developed before Greenbelt is lost.

We provided comments in May of this year in relation to the proposed development of the western section of this plot. In our response to this, it was noted that this large LDP polygon was located immediately to the south of the buffer area defined in relation to the Antonine Wall, which is both a scheduled monument and an element of the 'Frontiers of the Roman Empire' World Heritage Site. As a World Heritage Site, its outstanding universal value, authenticity and integrity must be protected, and as such, there is a presumption against development which would have an adverse impact on the Antonine Wall and its setting. The buffer was defined to protect the important landscape setting of the Wall. The buffer zone does not act as an absolute barrier to development, but defines a zone where added protection to the immediate setting of the World Heritage Site is given. Development proposals within the buffer zone should given careful consideration to determine whether it is likely to significantly detract from the Outstanding Universal Value, authenticity or integrity of the Antonine Wall.

While the polygon defined on the map that accompanied your letter does not impinge into the buffer area surrounding the wall, it is apparent that the development of this plot would still have the potential to change the setting of the monument. There is an interrupted ridge of higher ground that runs roughly east-west across the centre of the plot (Blackhill Farm is located on this feature), and it is likely that housing to the south of this ridge would have a limited effect on the setting of the wall, as the new buildings would be screened by the higher ground. Development on the northern slopes would be more difficult, as it is likely that housing in this area would be more prominently visible from the monument. This would potentially result in a fairly substantial alteration to the setting of the wall, changing a predominantly rural view into a more suburban one, and it is likely that considerable care would be needed in designing the scale and layout of any new housing in this area in an attempt to minimise this. It is obviously the case that housing is already present to the south of the plot, as well as to both the east and west, but it would be better to try to avoid any development that would further compromise the setting of the monument. I would therefore suggest that should this plot be taken forward, the developer should be asked to submit visualisations from various points on the wall-line demonstrating the extent to which development would affect the setting of the monument. This should be submitted as part of an environmental statement in support of the application, in order that the Council has the opportunity to assess whether the effect of the proposal on the setting of the monument is acceptable or not.

In terms of other issues associated with this plot, I would note that the line of the Forth and Clyde Canal passes through the section on the eastern side of Balmore Road. The canal is also legally-protected as a scheduled monument, and it would be a criminal offence to undertake any work within the boundaries of the monument without obtaining a grant of scheduled monument consent (SMC) in advance from Historic Scotland. In addition, as with the Antonine Wall, consideration would need to be given to the effect of any development on the setting of the canal.

Various farms are present within the area of potential greenfield release. Blackhill, Lochfauld, Kenmuir and Cawder Cuilt farms were depicted on Roy's Military Survey of Scotland (as Blackhill, Lochfaulds, Laigh Kenmuir and Calder Cule respectively), indicating that their foundations pre-date the period of widespread agricultural improvement in the later 18th and 19th centuries. It is possible that material related to earlier phases of occupation may survive below ground level in the surrounding landscape.

In addition, while the monuments relating to the Roman occupation represent the best-known elements of the historic environment in this area, features associated with other periods of activity are also present. A cropmark of an enclosure was identified on aerial photographs in the area to the east of the Summerston landfill facility. This was subject to evaluation trenching in 1997, which confirmed the presence of a feature defined by a V-shaped ditch and a number of features identified as prehistoric. A second linear crop mark has also been recorded from the area to the north of Lochfauld Farm, in the section of the plot that lies to the eastern side of Balmore Road. More modern features are represented by a WWII heavy anti-aircraft battery, located on the south side of Balmore Road immediately adjacent to the north-western corner of the block. Although of relatively recent date, this battery would also need to be taken into consideration in any assessment.

The most obvious issue associated with this plot relates to its proximity to the Antonine Wall and its associated buffer area, and I would reiterate my advice that any potential developer should provide illustrative material to demonstrate the extent of the impact of the proposal on the setting of the monument. If this is provided, and should the Council and Historic Scotland consider that the effect is within tolerable margins, there is also likely to be a need for evaluation trenching to assess the potential for the development to disturb or remove buried archaeological material. While there is an obvious potential for material associated with the Roman occupation to be present in the area behind the wall, it is apparent that

there is a strong likelihood that deposits relating to other periods, from prehistory onwards, may also survive.

Cllr Chris Kelly

559 /

801 Prop0079 Summerston

I am writing in response to the consultation on the 'Additional Potential Locations for Development' as part of the Local Development Plan for Glasgow and, in particular, to comment on the proposed feasibility study of the development potential of the green belt in Summerston, within which boundary includes an area to the north of Milton within the Canal ward.

As it is only the area between Castlebay/Scaraway Streets and the Forth & Clyde Canal that lies within my ward my comments will focus primarily on that section of Green Belt.

I would strongly oppose the development of housing upon that area of land for a number of reasons.

I note the environmental objectives referred to in relation to the Strategic Development Plan for Glasgow and the Clyde Valley and believe that development on the area of land referred to above would run contrary to these.

I do not believe that the development of this land would meet the objectives of directing planned growth to the most appropriate locations or supporting regeneration, as it would see a new community developed on the edge of existing established communities within which there currently exists a substantial amount vacant and derelict land (brownfield – mostly former housing sites). I believe the focus for planned growth and regeneration should therefore be within the existing communities, such as Milton and Possilpark, within which there is capacity for development. To identify for development a substantial area of Green Belt which lies just beyond these communities is likely to be detrimental to their regeneration potential.

Similarly, the development of this area of Green Belt would fail to meet the objective of safeguarding identity and protecting separation between communities. Indeed, the development of this Green Belt land would result in the further coalescence of boundaries with the neighbouring East Dunbartonshire authority at both the eastern and western edges of the identified site. This would serve to erode the identity of the community of Milton, where a new community to the north of Milton would merge towards the existing community of Summerston.

The existence of this Green Belt land to the north of Milton provides valuable accessible open space for the existing communities of Milton and Possilpark. These are communities which rank poorly on the SIMD, indeed Possilpark has the poorest ranking datazone in Glasgow and the second poorest in Scotland. To have open countryside on the doorstep of these communities is a valuable asset which should be further utilised to encourage outdoor activity rather than developed for housing when the existing adjacent communities are blighted by substantial areas of brownfield land as referred to above.

Furthermore, I believe that the development of this Green Belt land would run contrary to the objective of protecting the natural roles of the environment. Sitting adjacent to this land is Possil Marsh nature reserve, at the centre of which is Possil Loch, the Forth & Clyde Canal, a Scheduled Monument, runs through the Green Belt land at either side of which lie sines providing important environmental resources. There is a history of flooding on Scaraway Street and the lack of drainage capacity has been identified by Scottish Water as the cause of this. Similarly, there are substantial ongoing flooding issues on Balmore Road which runs through the identified site. Taking account of all of these factors I believe it would be both unreasonable and irresponsible to develop this land for housing as to do so would have a serious damaging effect on the natural environmental resources and, subsequently, a detrimental effect on the environment of adjacent existing communities.

It is for these reasons that I would reiterate my opposition to the development of housing upon the area of land referred to above. I believe that rather than considering the release of this Green Belt land for development the City Council should concentrate on securing development on the existing substantial areas of brownfield land within the Canal ward, facilitating measures to ensure that those areas of land currently considered as 'non effective' become 'effective' for housing development.

Development on this site has the potential to affect two heritage assets within our remit; the Antonine Wall World Heritage Site and the scheduled Forth and Clyde Canal. We are content with the principle of development in this location, as we consider that robust application of national and appropriate local policies should be able to mitigate any potential adverse impacts. However, we consider that early engagement with Historic Scotland on proposals for the site will be key to avoiding adverse impacts and optimising positive outcomes for the historic environment.

We support the proposed feasibility study of the development potential of the Green Belt in this very extensive site. In the Annex we advise on issues we believe the study should address. To assist you, we have mapped significant areas which we consider least suited to development. This is because they currently provide a range of natural heritage benefits including protecting wetland habitats, high quality landscape setting to existing settlements and significant opportunities for outdoor access. We also provide our initial assessment of two areas which we think provide the best opportunities for creating new successful communities, through maximising the existing natural heritage assets and providing new Green Belt edge.

This very large site, extending from below Bearsden to the fringes of Bishopbriggs, is relatively complex in terms of its topography, land cover, and natural heritage assets. We support the proposed feasibility study of its development potential and highlight the following considerations to be addressed. (Some of the elements involved feature on the enclosed map.)

- a. Protection needs to be afforded not only to the protected wetlands in the area, but also to their catchments:
 - protection of the nationally important freshwater habitat within Possil Marsh SSSI is an important consideration for areas which may drain to the SSSI, i.e. the field slopes southwest of Lochfauld Farm and land just north of Lambhill Cemetery. However, this need not on its own preclude built development here. Instead it might necessitate highly specified SUDS, which might in turn affect the potential built footprint. Any implications of contaminated land or mine workings etc would need assessed, leading to a detailed strategy to avoid pollution to the SSSI.
 - virtually all parts of the site east of the Canal drain into Kenmure Marsh C-SINC, and much of the site north of the Canal drains into Lochfauld Marsh C-SINC. Any development in these areas would need to incorporate SUDS replicating the quantity and quality of pre-development runoff, to avoid adverse impacts on the CSINC habitats. In addition, built development right up to the SINC boundaries could have adverse effects, whether by changing surface-water input to a small number of point sources, and/or by altering groundwater hydrology (especially if upfilling was involved). We expect the Council's Conservation staff could offer lead advice on these wetlands
- b. It is important to assess the ways in which the existing Green Belt provides the adjoining communities with a distinctive landscape setting, especially as experienced in certain key views. The study should consider how this Green Belt function would be affected by potential development at different scales and locations, including at the current urban fringe.
- c. The various parts of the Green Belt also contribute together to the Rolling Farmland landscape character (ref: Glasgow and Clyde Valley Landscape Character Assessment). Potential effects on this should be assessed in the context of the Site of Special Landscape Importance (SSLI) designation:
 - any housing land allocations should reflect the landscape character in terms of location, scale, form and intervisibility;
 - the extent to which new housing development fits the local landscape, taking account of landform, land cover and the patterns of existing settlement, should be maximised;
 - the role and value of views 'inwards' from sensitive visual receptors (see enclosed map) towards the existing city edge should be analysed and potential effects on them considered;
 - the study should also assess potential effects on how the site's field boundaries contribute to landscape character and connectivity for wildlife.
- d. Potential provision of robust new Green Belt edge should be considered in combination with any opportunities to create a sustainable settlement layout, and to contribute to the wider Green Network by enhancing existing recreational routes and creating new access links to the wider countryside.
- e. Potential net effects on recreational use should be considered, as this is a key Green Belt function. Both formal and informal routes, and the numbers of people involved, should be considered, with particular attention to use of the Canal corridor as a strategic asset in the Central Scotland Green Network.
- f. Any sites considered for release from Green Belt must be able to deliver development which is sustainable in the broadest sense, in line with the criteria in Diagram 4 of the Approved Glasgow & Clyde Valley Strategic Development Plan.

Considering the above matters, and following a site visit, we offer the following comments, which should be read in conjunction with the enclosed map.

Currently, the Green Belt is generally robust. The landscape is characterised by an undulating landform with small farms with associated woodlands, hedgerows and shelterbelts. These attributes soften the urban edge, limiting views across the city from key visual receptors such as the Balmore Road (A879), Forth and Clyde Canal and Kelvin Walkway. The landscape setting provided to the existing city-edge communities is generally high in quality. Views in which the rural Green Belt provides a foreground to the hills beyond are particularly influential.

Across most of the site, the undulating topography physically and visually contains the edge of the city, providing a robust Green Belt function. New housing development on this rolling farmland would be contrary to the existing pattern of settlement, especially since the required no-build areas on/around the protected wetlands would isolate any new housing to their north. It would also likely require modification of the topography, resulting in broken ridgelines and the loss of the character and integrity of the greenbelt.

The ability of most of this site to deliver development which is well-connected and sustainable is questionable, particularly given its relative isolation and physical detachment from existing facilities and services. The following two areas we believe do have potential to deliver new successful communities.

Site A – Milton - situated within the Rolling Farmland Landscape Character Type (LCT) 1. The key characteristics of this LCT are its distinctive undulating landform, dominance of pastoral farming, and importance of woodland in structuring the landscape and providing shelter. The planning guidelines within Glasgow and Clyde Valley Landscape Character Assessment for this LCT 1 include:

- to preserve the rural character of the area, developments should be of a small scale, well sited to maximise the natural screening provided by topography and woodland variety;
- the imposition of developments which require medium to large scale modifications to the undulating topography should be resisted; developments and their external areas should be tailored to 'fit' the landscape, or sites selected which permit their integration.

We note that the rising topography and woodlands north of site A would provide natural screening and retain the rolling farmland landscape character, supporting a new robust Green Belt edge. Any new housing development would 'fit' reasonably into the landscape without requiring significant modification to the topography. Site A does appear to be valued for informal recreational use. Any development would need to offset loss of this, particularly by providing good recreational connectivity from existing communities to the Green Belt through the new development. Together with Kenmure Marsh C-SINC, the drain/swale by Castlebay Drive and the mature hedgerow running east to Kenmure Riding School are key existing landscape features. They should be retained for their contribution to a robust landscape framework.

Site B – Summerston - situated within the Broad Valley Lowland LCT1. The planning guidelines for this LCT within Glasgow and Clyde Valley Landscape Character Assessment highlight that development should be topographically contained and visually integrated within the landscape framework, avoiding the flat valley floor. Site B sits on gently sloping land between the River Kelvin flood plain and the steeper valley slopes to the east. This topography, together with the riparian woodland along the Kelvin, would provide natural containment and screening for any new housing development. The existing field boundary hedgerows and the dismantled railway and would provide mature and logical boundaries around most of the site, forming the basis for a robust new Green Belt edge.

Brian Grogans

Glasgow Life

563 /

815 Prop0079 Summerston

Given the geographic extent of the proposed development zone spanning from Summerston in the west to Milton in the east, Glasgow Life welcomes the City Council's proposal to undertake a feasibility study into the development potential of this area whilst taking into account hydrological, landscape, access, nature conservation and other considerations.

The proposed expansion of the built form will firstly add a significant number of new residents in the north of the city, which in turn will generate additional demand for community, sports and cultural services. The proposed housing growth will also offer the potential for greater connectivity with and between the existing communities of Summerston, Cadder and Milton.

Consequently Glasgow Life will wish to make future representation on the suitability of existing provision being able to meet the needs of an expanding population, either as part of the proposed feasibility study or any future master-planning exercise. Once there is clarity as to the scope and timeframe of the initial proposed feasibility study, Glasgow Life will initiate an audit of existing service provision and user groups to help inform assessments of future facility and/or service requirements.

Anne Youngman

Bat Conservation Trust

564 /

821 Prop0079 Summerston

River Kelvin, riparian woodland, Forth and Clyde canal – all valuable as commuting routes and as feeding areas. Mixed woodland /shelter belt in west of site – may contain bat roosts also provides sheltered areas for feeding and wildlife corridor linking housing at Blackhill gardens to riparian woodland.

Good area for bats. Safeguard bat interest by: Retaining trees (especially mature trees); Avoid light pollution along canal: Retain connections (wildlife corridors) linking river Kelvin, canal and Possil park.

The Council has requested submissions on its approach to its removal of this area from the Green Belt following previous consultation on a smaller area (Prop 0052) in 2012. The size of this proposed removal from the Green Belt raises serious concerns about the application of the policies as described above in particular:

- Access to Woodland and green space by residents
- Connectivity between woodlands and habitats
- Presumption of non-development of woodland and Green Belt.
- Provision of buffers between ancient woodland and potential development.
- A presumption of alternatives to green field sites.

In particular:

- The Woodland Trust would strongly oppose any removal from the Green Belt of areas adjacent to the ancient woodland identified along the River Kelvin without a significant buffer zone. Native woodland is also present along the Forth and Clyde Canal which runs through the considered area. The effect on fauna and flora dispersal along this route should be considered.
- The potential boundary of the exclusion of Green Belt runs directly adjacent to existing woodlands including Balmully Wood, the Ancient Woodland of Low Moss Plantation and other areas of Ancient Woodland in the East of the proposed area. The effects of any proposed development on the areas must be considered including the effect on their connectivity with other areas of woodland and trees. Any withdrawal from the Green Belt should include the provision of a substantial buffer.
- Possil Loch a Site of Special Scientific Interest, contains woodland and is an "important staging post during the spring and autumn migration for warblers and wildfowl". This would be isolated from the above areas by potential development in the reviewed proposal. The benefits of connection between habitats for wildlife and people should be considered.
- The proposal offers a significant decrease of green area for access by the residents of Glasgow who ought to be able to rely on the certainty of a Green Belt designation.

This area contains a significant contribution to the woodland network and great potential for expanding woodland in pursuance of regional and national goals. Expansion of urban development into this area should be weighed carefully against the benefits of housing on rehabilitated sites.

Maryhill & Summerston Community Council would like to make a representation regarding the above potential development site.

During the consultation for the previous development of housing on Balmore Road, Summerston, the local community was informed that no further development would or could take place due to the remaining area being a flood plain. The Community Council would like to know what has changed in the last 5 - 10 years that would make this no longer the case.

In addition, the council feels that other brownfield sites within Maryhill itself would be a better location for any housing development, one possible site being the area around Kilmun Street where housing was demolished. Maryhill is a socially deprived area which would benefit hugely from the development of both private and social housing sitting alongside one another. With this deprivation in mind, the people of the area benefit from the open space around them, many of them would find it difficult if not impossible to access it if it was not on their doorstep.

As a city with many run down spaces, empty buildings and vacant brownfield sites, why is it necessary to build on open countryside which is important for wildlife aswell as people.

The Community Council would very much appreciate continued communication from the council before a final decision is taken.

Cllr Helen Stephen

570 /

843 Prop0079 Summerston

I write to raise raise my objection to the proposed development potential of the green belt in Summerston, within which boundary includes an area to the north of Milton within the Canal ward (16).

As it is only the area between Castlebay/Scaraway Streets and the Forth & Clyde Canal that lies within my ward, my comments shall reflect this.

I would strongly oppose the development of housing upon that area of land for a number of reasons.

I note the environmental objectives referred to in relation to the Strategic Development Plan for Glasgow and the Clyde Valley and believe that development on the area of land referred to above would run contrary to these.

I do not believe that the development of this land would meet the objectives of directing planned growth to the most appropriate locations or supporting regeneration, as it would see a new community developed on the edge of existing established communities within which there currently exists a substantial amount vacant and derelict land (brownfield – mostly former housing sites). I strongly believe the focus for planned growth and regeneration should therefore be within the existing communities, such as Milton and Possilpark, within which there is capacity for development. To identify for development a substantial area of Green Belt which lies just beyond these communities is likely to be detrimental to their regeneration potential.

The existence of this Green Belt land to the north of Milton provides valuable accessible open space for the existing communities of Milton and Possilpark. These are communities which rank poorly on the SIMD, indeed Possilpark has the poorest ranking datazone in Glasgow and the second poorest in Scotland. To have open countryside on the doorstep of these communities is a valuable asset which should be further utilised to encourage outdoor activity rather than developed for housing when the existing adjacent communities are blighted by substantial areas of brownfield land.

Furthermore, I believe that the development of this Green Belt land would run contrary to the objective of protecting the natural roles of the environment. Sitting adjacent to this land is Possil Marsh nature reserve, at the centre of which is Possil Loch, the Forth & Clyde Canal, a Scheduled Monument, runs through the Green Belt land at either side of which lie sinks providing important environmental resources. There is a history of flooding on Scaraway Street and the lack of drainage capacity has been identified by Scottish Water as the cause of this. Similarly, there are substantial ongoing flooding issues on Balmore Road which runs through the identified site. Taking account of all of these factors I believe it would be both unreasonable and irresponsible to develop this land for housing as to do so would have a serious damaging effect on the natural environmental resources and, subsequently, a detrimental effect on the environment of adjacent existing communities.

It is for these reasons that I would reiterate my opposition to the development of housing upon the area of land referred to above. I believe that rather than considering the release of this Green Belt land for development the City Council should concentrate on securing development on the existing substantial areas of brownfield land within the Canal ward, facilitating measures to ensure that those areas of land currently considered as 'non effective' become 'effective' for housing development.

Glasgow Natural History Society

571 /

848 Prop0079 Summerston

We have strong concerns about the potential development at Summerston on account of the impact directly or indirectly on the designated areas included or close by.

We note that the description attached to the plan of this site is highly confusing. What is in fact required? The consultation purports to be a consultation regarding "additional potential locations for development land". SO where does the requirement for a comment on the proposals to undertake a feasibility study fit into a consultation process regarding land designation? Or is a comment required on the release of a parcel of land for housing? There is reference to proposal 0052 (which should not be commented on), but there are two sites on the map - one is 0051 and the other is 0079 - there is no 0052.

We have to suggest that both sites shown on the map constitute an intrusion into greenbelt, agricultural land, sites of ecological importance and the rural environment. Both sites - particularly if put together, disrupt green corridors and the flow of biodiversity into and out of green spaces to the south. Both sites, if developed, constitute an unacceptable extension of the built environment into the greenbelt around Glasgow's built environment. Site 0079 locks Possil Marshes into a wasteland of housing which will inevitably disrupt wildlife, water quality, biodiversity and its sense of place.

Not only is this proposal unacceptable as a site for housing, but the weight of any argument about necessity is removed by the existence of sites to the south which would be more suitable for development and less damaging to the environmental considerations required and less in conflict with City Plan policies.

Should the Council undertake a feasibility study on the greenbelt in this area, we trust that SWT will be on the list of consultees.

The adopted East Dunbartonshire Local Plan 2 allocates land for housing and mixed uses to the north west of the proposed site (HMU 1 (14)). The principle of development at this location was confirmed through the Glasgow and Clyde Valley Joint Structure Plan, and was allocated largely on the basis of its contribution to the funding of the Bishopbriggs Relief Road and to help support the viability of a future rail halt at Westerhill.

However, the intention was that the Bishopbriggs Relief Road would act as a 'defensible' long-term greenbelt boundary, which is one reason why land to the east of the BRR was not allocated for development. The proposed development area within the Glasgow City boundary, which is located to the east of the BRR, would significantly undermine this strategy and would lead to a disjointed pattern of development in this part of the city region. This would also mean that the area of land north of the Auchinairn Road at Wester Lumloch within East Dunbartonshire would be bordered by residential developments to the west and south and potentially increase the risk of speculative development approaches in this part of greenbelt.

In this respect East Dunbartonshire Council consider that significant weighting should be given to the findings of an independent green belt study commissioned as part of our own Main Issues Report work. Our study concluded that the land south of Auchinairn Road is highly sensitive in terms of visual prominence and the setting of the built up area. The area has been assessed as having a low landscape capacity for development (see appendix 1 for further details).

It is considered that the expanded development sites would have a significant impact on the viability of the Glasgow North Community Growth Area at Robroyston, as identified in the Strategic Development Plan. As stated in our previous consultation response, delivery within this CGA would be compromised should additional land in the north of Glasgow be released from the greenbelt. The expanded areas subject to this consultation would significantly increase the likelihood of this outcome.

East Dunbartonshire Council is therefore strongly opposed to the potential release of additional greenbelt land at either location as this would conflict with the Strategic Development Plan's vision of "maintaining a sustainable compact city-region" aimed at minimising the carbon and development footprint. Instead, East Dunbartonshire Council would continue to support the prioritisation of brownfield development across the city region. These are more sustainable in the long-term than small scale Greenfield release sites. Greenfield release should only be considered after brownfield opportunities have been exhausted and currently identified Community Growth Areas have been built out.

Caledonian Properties Ltd

446 /

844 Prop0080 Auchinairn Road, Robroyston

The completion of a masterplan and engineering appraisal has demonstrated that development is readily deliverable on this site. Essentially, the site is effective and could be brought forward within the short-medium term.

Levels for the site have been maintained and landscape setting has been considered by GD Lodge and Brindley Associates in the preparation of the masterplan. The SSLI local designation is considered to be largely redundant in this instance due to the extent of development currently consented within it. The potential effects upon the remaining SSLI component are not therefore considered to be significant in this context.

The landscape proposals are based entirely upon this landscape appraisal and will provide an appropriate landscape setting for new residential development which will also result in habitat creation, local biodiversity gains and allow removal of part of the site from the greenbelt without materially affecting the role of the greenbelt in terms of maintaining settlement separation.

Furthermore, it is considered that many of the aspirations of the greenbelt can still be met in developing this site. Indeed accessibility could be enhanced and greater management secured by development.

We are of the opinion that the Council should identify further land from the green belt to ensure an effective land supply. It is considered that the site should be included as a housing site within the Proposed Plan.

Further submissions accompany.

Carol A. Gilbert

Strathclyde Partnership for Transport

529 /

864 Prop0080 Auchinairn Road, Robroyston

Taking accessibility by public transport as the only criteria, site 80 is currently not accessible by public transport. SPT would not support the development of site 80 as it does not have access to a basic public transport accessibility service. This development site is likely to require a private car to access and as such we would suggest that it is not considered for development as it is likely that development of the site would result in unsustainable travel behaviour.

Lynne Anderson

Scottish Environment Protection Agency

534 /

853 Prop0080 Auchinairn Road, Robroyston

Potential development of allocation could increase the probability of flooding elsewhere. We will require a FRA / other relevant additional information to be submitted at the planning application stage so that the risk from the minor watercourse that runs on the boundary of the site can be fully assessed. Areas near the watercourse may not be available for development. The existing culverted section will also have to be assessed in terms of its potential impact.

Judy Wilkinson/Elizabeth Stewart

Scottish Allotments and Gardens Society/Glasgow Allotments Forum

535 /

839 Prop0080 Auchinairn Road, Robroyston

We support that the designation of green belt should be continued, but that the greenbelt following the proposal 0047 should also be retained. City Plan 2 stated that they 'would work with landowners and developers to prepare a masterplan for the Robroyston/Millerston Community Growth Area; and work closely with the GHA and Registered Social Landlords to ensure a strategic approach to housing renewal, particularly in the preparation of a masterplan for Red Road/Barmulloch. And that 'The City Council will, through the masterplan for the Community Growth Area:ensure that environmentally important areas are protected; and revise and consolidate the green belt edge, identify new leisure and recreational opportunities and define contributions required for the establishment of the green network'

We have not seen the master plan but suggest that this area of green belt retained and that more allotments and growing spaces integrated in all the plans for the area. There is a dearth of spaces where local people can grow their own food and participate in the health and well being aspects of community growing. We trust that allotments and growing spaces have been incorporated into the master plan.

Taylor Wimpey (Auchinairn Road)

554 /

790 Prop0080 Auchinairn Road, Robroyston

We agree with the Council's proposal to consider land at Auchinairn Road for release as described in the above document. This area adjoins the Taylor Wimpey owned site at Auchinairn Road, Prop 047, which has been fully investigated and evidence already produced to prove the site's suitability and effectiveness for development as a housing site. Prop 080 further adjoins the Robroyston Community Growth Area, currently being developed by Stewart Milne, as shown in your compelling diagram, which illustrates the potential and proposed new residential zones in this area.

In the opinion of Taylor Wimpey, the release of Prop 047 is a logical extension to the urban area of Glasgow, and it would be consistent if the Council also release the proposed area Prop 080 in a similar way. In noting the comments made by East Dunbartonshire Council relating to the Bishopbriggs by-pass, this has no relevance to land within the Glasgow City boundary as development is completed on both sides of the link road within Glasgow. In addition, the Community Growth Area and the need for effective new sites combine to make these prospective release sites 47 and 80 a sustainable and suitable planning response to meeting housing needs as promoted by the Council in achieving a generous land supply.

Martin O'Hare

West of Scotland Archaeology Service

556 /

794 Prop0080 Auchinairn Road, Robroyston

No sites have been recorded from within the boundaries of this plot, located to the south of Auchinairn Road. It is located immediately south of Wester Lumloch Farm, which was depicted on Roy's Military Survey of Scotland, indicating that a settlement was already in place by the mid 18th century. At its eastern end, the plot also surrounds the former site of Easter Lumloch. This farm was also shown by Roy, and appeared on the 1st, 2nd and 3rd edition Ordnance Survey maps, but is not depicted on modern versions, on which its former site is shown as being occupied by a small block of woodland. Its former position is still indicated by a bend in Lumloch Road, which defines the western and northern boundaries of the former farm yard. Patterns of settlement and landholding in pre-improvement Scotland could be fairly stable and long-lived, and the appearance of both Wester and Easter Lumloch on a map of the mid 18th century suggests that the original foundation of these farms could be considerably earlier. While the majority of the current farm buildings of Wester Lumloch lie to the north of Auchinairn Road, and the mapped extent of Easter Lumloch as shown on early OS editions does not impinge into the area of potential greenfield release, it is possible that evidence for earlier elements of the settlement may be present below ground level.

Around 250m to the south-west of the LDP plot is Wallace's Monument, erected in 1900 to mark the reputed site of the house in which William Wallace was betrayed in 1305. It is situated close to Robroyston Mains farm, which was also shown on the Roy Map of the mid 18th century, and there is also a feature known as Wallace's Well nearby. This feature is named on modern OS maps, and is shown immediately to the south of the plot, though it is located on the opposite side of Langmuirhead Road. However, although it appears on current OS maps as Wallace's Well, it was shown as Auchinleck Well on the 1st edition, suggesting that the association with Wallace may date only from the latter half of the 19th century. While none of these features are likely to be directly affected by the development of the area of potential greenfield release, their presence serves to indicate a potential for material associated with earlier phases of activity to survive, as they would suggest occupation in the vicinity during the medieval period. The ground within the plot does not appear to have been substantially affected by development during the modern period, and as a result, it is likely that we would look for evaluation trenching to assess whether significant archaeological material survives.

Derek Manson

Scottish Natural Heritage

562 /

809 Prop0080 Auchinairn Road, Robroyston

We consider this site does not have capacity for housing development because of adverse effects on landscape character and visual amenity.

We previously highlighted at Additional Sites stage that the elevated ridgeline within this site provides a distinct landscape setting both to the existing communities and those proposed within the Robroyston Community Growth Area (CGA). Development here would detract from this Green Belt function. Also, the site's topography partly contains the city edge in views / approaches from the Rolling Farmlands Landscape Character Type in adjoining parts of North Lanarkshire (ref: Glasgow and Clyde Valley Landscape Character Assessment, Land Use Consultants 1999). We consider that development on the northern and eastern parts of this site would adversely affect landscape character and detract from visual amenity in these areas.

We understand from Alan Duff (GCC planning officer) that the permission granted for the CGA may have included limited development (community facility or restaurant) on the slope foot north of the Stand Burn. However, we consider that greenfield release for housing on the lower slopes of this site would be inappropriate. This is because the resulting new Green Belt edge would lack justification and be hard to defend. In contrast, the current Green Belt edge along the B765 and the Stand Burn / Wester Lumloch L-SINC is relatively strong.

Based on the above points, we consider the site does not have capacity for built development and it should remain as Green Belt.

Brian Grogans

Glasgow Life

563 /

816 Prop0080 Auchinairn Road, Robroyston

Glasgow Life notes the proposed extension of the green belt on the northern edge of Robroyston, effectively increasing the scope of the proposed Robroyston Community Growth Area. Whilst it is not yet clear what potential impact this further land allocation for housing growth may have in terms of additional demand for cultural services, it is noted that the overall master-plan for this Community Growth Area includes land allocation and financial provision for the establishment of a new community indoor/outdoor sports hub to be located at the "high amenity" site immediately to the south of the M80 junction. As such it is not expected that the scale of proposed housing expansion will generate sufficient demand as to significantly alter the scale of new cultural provision already envisaged.

Anne Youngman

Bat Conservation Trust

564 /

822 Prop0080 Auchinairn Road, Robroyston

Mixed deciduous woodland to east. This may contain bat roosts.

Christine Morrison

566 /

827 Prop0080 Auchinairn Road, Robroyston

I wish to object to the proposal to include the above site in Glasgow City Council's emerging Local Development Plan.

This site is visually very sensitive. At present it is farmland growing various crops from year to year and it creates a very attractive approach to Glasgow. Any development on the site would compromise this. It would be highly visible from Lenzie to the north east, along Crosshill Road and Robroyston Road and as the site lies on a hill, no amount of landscape mitigation would be successful in reducing the adverse landscape and visual impact resulting from development. This is such an important issue if we wish to prevent urban sprawl and coalescence between settlements. Development of this site would irrevocably threaten the site's spatial functionality.

Having looked at the map on your website I am utterly amazed to see that you have also considered developing adjacent land between Auchinairn Road and Lumloch Road. The land is such a natural buffer between the Wallacewell development and the surrounding open countryside. In addition, the steepness of the topography is such that it's difficult to see it as a suitable site for development. My concern is that housing on this site along the brow of the hill opposite Wester Lumloch Farm on Auchinairn Rd. will also be highly visible from the countryside to the north east.

I am sure you are aware that East Dunbartonshire Council is also at the MIR stage of its emerging Local Development Plan, and they have turned down an application to include the adjacent land on the north side of Auchinairn Road (LDP5) for development. It seems somewhat contrary that the very reasons EDC sees fit to protect that land are at odds with your own. In their Landscape Capacity Assessment of Pre-MIR Sites they state – "In views from the east the site is important in screening the town (the Auchinairn development) and in providing a pleasant, soft gateway into East Dunbartonshire.....". How can such divergence of views exist between Local authorities in respect of adjacent pieces of land?

It would seem a natural and defensible fit for the green belt boundary to pass wholly along the Bishopbriggs relief road i.e from the roundabout at Lumloch Road./Robroyston Road, north to the roundabout at Auchinairn Road/Robroyston Road, and thereafter north to Westerhill Farm along the road presently under construction. On the south side Lumloch Road creates another natural boundary. So why seek to change it?

Katharine Rist

The Woodland Trust

568 /

832 Prop0080 Auchinairn Road, Robroyston

For the reasons given above any addition to the Green Belt is welcomed. The site for consultation currently is agricultural but is edged by young woodland to the South and East. Even if not a site for woodland itself this can provide a buffer for the current existing woodland.

Clare Darlaston

Scottish Wildlife Trust

576 /

870 Prop0080 Auchinairn Road, Robroyston

No impact assessment check list was provided for this site. However, the release of this parcel of land would constitute an encroachment of the greenbelt boundary, into productive arable land.

The inclusion of this site presumes that the site to the south (which is shown as being subject to previous consultation) is approved for housing. The definition of this site as suitable for housing development would extend the built-up area further north into the countryside, leaving assorted and disconnected undeveloped areas to the south, and a totally irrational greenbelt boundary.

Your consultation suggests that "there is an area of green belt to the north of Auchinairn Road where the greenbelt status requires consideration in the context of the surrounding proposals". As no information is provided on the surrounding proposals, this is an impossible requirement. There is no apparent reason why greenbelt status should be removed from this site, and there are ample development opportunities without pushing the built up area north. We are opposed to the opening up of this area for housing.

Prop0081 South of Arden Craig Road

Comstock (Carmunnock Road)**336 /****788 Prop0081 South of Arden Craig Road**

We agree with the Council's proposal to potentially add the two sites at Castlemilk, the area to the south of Arden Craig Road and Lainshaw Drive into the greenbelt. We consider that these sites would not be effective housing sites and that our site at Mid-Netherton be the preferred release location in the Castlemilk area.

Lorraine Jones**Sport Scotland****478 /****818 Prop0081 South of Arden Craig Road**

We support proposals for green belt inclusion at Cathkin Braes. These will enhance the recreation provision that has recently been developed at Cathkin Braes for mountain biking as part of the Commonwealth Games.

Lynne Anderson**Scottish Environment Protection Agency****534 /****851 Prop0081 South of Arden Craig Road**

We have no objection to the allocation of this site on flood risk grounds.

Judy Wilkinson/Elizabeth Stewart**Scottish Allotments and Gardens Society/Glasgow Allotments Forum****535 /****837 Prop0081 South of Arden Craig Road**

We noted in our response to the MIR that about approximately 214ha of green belt and about 37 ha of greenspace would be lost through these proposals and there were only requests for 2.2 ha of redefinition to greenspace. We are therefore pleased at the suggestion of an increase in green belt through 0081 Cathkin Braes and 0082 Lainshaw Drive, Castlemilk.

Judy Wilkinson/Elizabeth Stewart**Scottish Allotments and Gardens Society/Glasgow Allotments Forum****535 /****838 Prop0081 South of Arden Craig Road**

We noted in our response to the MIR that about approximately 214ha of green belt and about 37 ha of greenspace would be lost through these proposals and there were only requests for 2.2 ha of redefinition to greenspace. We are therefore pleased at the suggestion of an increase in green belt through 0081 Cathkin Braes and 0082 Lainshaw Drive, Castlemilk.

Martin O'Hare**West of Scotland Archaeology Service****556 /****795 Prop0081 South of Arden Craig Road**

This proposal relates to the addition of an area to the greenbelt, rather than its potential development. The plot is located immediately to the east of the former site of St Martin's Primary School. The section immediately adjacent to the former school does not appear to have been affected by development during the modern period, having been depicted as open ground on various Ordnance Survey maps from the 1st edition onwards. The eastern end of the plot, however, does show evidence for previous use. A single roofed building was shown within this section of the plot on the 1st edition. This was associated with a number of enclosures, while a well was also depicted to the south-west. By the time of the 2nd edition map of the 1890s, this settlement had been expanded, and a number of additional buildings had been erected, including a sheepfold at the north-western corner of the plot. Many of these buildings appear to have been removed by the time of the 3rd edition, on which the main building was annotated as a kennels, connected by a track running southwards from Castlemilk House, and this was also the case on the 4th edition. Current OS maps indicate that many of the buildings of the former settlement-group continue to survive on the site, albeit in an unroofed form, though aerial photographs indicate that these are under tree cover. A number of other features have also been recorded from the wider landscape surrounding the plot. However, the fact that this plot is proposed for inclusion in the greenbelt rather than as a prospective development site suggests that these structures (and any related sub-surface deposits that may be present) are unlikely to be affected by the change in designation.

East Renfrewshire Council

558 /

799 Prop0081 South of Arden Craig Road

This site is identified for inclusion within the greenbelt and is described as making a positive contribution to ensure the strength and quality of the greenbelt. The Council welcomes this additional designation to the greenbelt. The Council further notes that the respective existing designation under City Plan 2 is 'Residential and Supporting Uses' under Policy DEV2.

Derek Manson

Scottish Natural Heritage

562 /

812 Prop0081 South of Arden Craig Road

These two sites provide Green Belt functions such as providing a landscape setting to the existing communities and providing recreation opportunities. These would be lost if they were developed. We therefore support the proposal to include them into the Green Belt.

Anne Youngman

Bat Conservation Trust

564 /

823 Prop0081 South of Arden Craig Road

Mature trees (if still present on site) may contain bat roosts. Woodland / scrub will provide feeding areas for bats.

Google earth shows trees but the site plan suggests buildings are now on the site.

Katharine Rist

The Woodland Trust

568 /

833 Prop0081 South of Arden Craig Road

This site has been identified for potential inclusion into the Green Belt. The Woodland Trust strongly supports the inclusion of this small site into the Green Belt to provide increased area of woodland and buffering. The site adjoins the Cathkin Braes Country Park, is partially wooded and merges with the Ancient Woodland of Big Wood to the South.

Glasgow Natural History Society

571 /

845 Prop0081 South of Arden Craig Road

We support the addition to the Greenbelt of the areas to the S of Arden Craig Road, and adjacent to Lainshaw Drive, as these are useful extensions of existing designated areas and / or associated green network.

I am writing on behalf of the Mitchellhill Community Group (MCG) in respect of the proposed revision of the Local Development Plan for Glasgow (2014), specifically the redesignation of the site south of Ardencraig Road, Cathkin Braes LNR.

The MCG is a community based initiative, working in partnership with a variety of stakeholders, including the Cathkin Braes Legacy Group (chaired by Cllr Cunning and attended by Lord Provost Docherty and officials from Land & Environmental Services), to develop a City Legacy from the commonwealth Games mountain bike track located in Cathkin Braes. Our aim is to upgrade and turn the category B listed former St Martin's Church on Ardencraig Road into the "Cathkin Braes Mountain Bike and Activity Centre". In the first instance, our proposals necessarily include works to the site of the former Mitchellhill high rise flats to form access and parking for the Visitor's Centre. However, outline proposals for other services, associated with the sustainability of the Visitor's Centre, are also being investigated, including possible camping facilities and an extension of the bike track post Games to enhance the "visitor Experience".

Our opening Business Plan for the Centre assumes the creation of 17.9 direct and 21 indirect FTE jobs, thereby providing a very strong economic as well as health and tourism rationale for the development of the Centre. The Centre has also been devised as a base for enhancing and developing new activities within the Country Park, thereby becoming a "Gateway" to the Park itself.

We have grave reservations about redesignating the immediately adjacent site bound in red as Greenspace until the proposals for the Cathkin Braes Mountain Bike and Activity Centre have been worked through and the required land package established and assembled. Our advice, derived from the findings of a Feasibility Study undertaken by Ardenglen Housing Association, is that access to said site from Ardencraig Road can only be achieved via the Mitchellhill site and as such we believe both to be inextricably linked. For this reason, we would object to its redesignation at this particular point in time.

I am writing on behalf of Ardenglen Housing Association in respect of the proposed revision to the Local Development Plan for Glasgow (2014), specifically the redesignation of the site south of Ardencraig Road, Cathkin Braes LNR.

Ardenglen writes in a double capacity, both as a potential developer of the site and through our work supporting the Mitchellhill Community Group to realise its proposals for the "Cathkin Braes Mountain Bike and Activity Centre".

In the first instance, Ardenglen was given permission to undertake a feasibility study of the site bound in red a number of years ago. This was carried out with a view to the requirements of the Strategic Housing Investment Plan and is currently in the process of being updated in the light of the impact of Welfare Reform (the demand for smaller sized housing units) and the recent Scottish Government's updating of the social housing subsidy. Prior to any redesignation of the site as Greenspace, we would therefore welcome the opportunity to present our findings, specifically in relation to how possible redevelopment for social housing would support a number of other strategic Council targets.

Turning to the matter of the proposed Cathkin Braes Mountain Bike and Activity Centre, our study has informed the work of the Mitchellhill Community Group as it shows that access to the site bound in red is only possible via the Mitchellhill site itself. For this reason, we would caution against redesignation of the site until the proposals for this exciting and unique Community Enterprise have been fully tested.

For its part, the Association believes the potential for the City (and its citizens) of the Activity Centre is so great that any redevelopment proposals that we may have for the area are also secondary to the finalisation of its current redevelopment process.

Prop0082 Lainshaw Drive, Castlemilk

Comstock (Carmunnock Road)**336 /****789 Prop0082 Lainshaw Drive, Castlemilk**

We agree with the Council's proposal to potentially add the two sites at Castlemilk, the area to the south of Arden Craig Road and Lainshaw Drive into the greenbelt. We consider that these sites would not be effective housing sites and that our site at Mid-Netherton be the preferred release location in the Castlemilk area.

Lynne Anderson**Scottish Environment Protection Agency****534 /****852 Prop0082 Lainshaw Drive, Castlemilk**

We have no objection to the allocation of this site on flood risk grounds.

Martin O'Hare**West of Scotland Archaeology Service****556 /****796 Prop0082 Lainshaw Drive, Castlemilk**

As with the plot to the south of Arden Craig Road, this proposal relates to the addition of an area to the greenbelt, rather than its potential development. This plot comprises a roughly triangular area to the south of Lainshaw Drive. A track has been identified in the Historic Environment Record database running through this area, though the age and significance of this feature is not recorded. The plot itself was shown as largely undeveloped ground on the 1st, 2nd, 3rd and 4th edition Ordnance Survey maps, with the exception of a block of woodland at its south-western end. Modern OS maps indicate that it is almost entirely occupied by trees, and it is likely that their roots will have resulted in a degree of disruption to any buried deposits relating to earlier phases of occupation that may have been present. However, the potential for buried material to have existed is enhanced by the results of an archaeological evaluation undertaken in 2009 in advance of the formation of an extension to Linn Cemetery, a process that identified over 80 potential features within a relatively restricted area. This would suggest that there is a reasonable potential for similar buried material to be present, though as this proposal is for the addition of this area to the greenbelt, it is unlikely that its redesignation would result in any ground disturbance, meaning the potential for any deposits that may be present to be affected will be limited.

East Renfrewshire Council**558 /****800 Prop0082 Lainshaw Drive, Castlemilk**

This site is identified for inclusion within the greenbelt and is described as making a positive contribution to ensure the strength and quality of the greenbelt. The Council welcomes this additional designation to the greenbelt. The Council further notes that the respective existing designation under City Plan 2 is 'Greenspace' under Policy Dev11.

Derek Manson**Scottish Natural Heritage****562 /****813 Prop0082 Lainshaw Drive, Castlemilk**

These two sites provide Green Belt functions such as providing a landscape setting to the existing communities and providing recreation opportunities. These would be lost if they were developed. We therefore support the proposal to include them into the Green Belt.

Anne Youngman**Bat Conservation Trust****564 /****824 Prop0082 Lainshaw Drive, Castlemilk**

Mature trees may contain bat roosts. Woodland / scrub will provide feeding areas for bats. Retaining this area as greenbelt is to be welcomed. For residents of Lindale Oval and Holmbryde road this brings nature "onto the doorstep".

Katharine Rist

The Woodland Trust

568 /

834 Prop0082 Lainshaw Drive, Castlemilk

This site has been identified for potential inclusion into the Green Belt. This site is wooded and adjoins woodland to the South (Cart and Kitch Valley Woods) and is adjacent to ancient woodland in Linn Park. There is also a small area of ancient woodland North of the site across Lainshaw Drive. For these reasons The Woodland Trust supports the inclusion of this site into the Green Belt.

Glasgow Natural History Society

571 /

846 Prop0082 Lainshaw Drive, Castlemilk

We support the addition to the Greenbelt of the areas to the S of Arden Craig Road, and adjacent to Lainshaw Drive, as these are useful extensions of existing designated areas and / or associated green network.

Clare Darlaston

Scottish Wildlife Trust

576 /

867 Prop0082 Lainshaw Drive, Castlemilk

We would oppose the inclusion of this area for development on the grounds that it appears to be an area of woodland and thus its inclusion is contrary to several policies in the city plan. There is no clear reason why you have chosen to include this site: and none is given.

SEA Comments

Nick Everett

Scottish Natural Heritage (as Consultation Authority)

561 /

806 SEA Comments

The following comments express our concern that this element of SEA has missed the opportunity to genuinely inform preparation of your LDP. Our comments are in the context of our previous consultation responses on the SEA scoping, the assessment methodology, and the Interim Environmental Report of the Main Issues Report (MIR IER) - dated 27 July 2010, 7 February 2011, and 9 December 2011 respectively.

Nick Everett

Scottish Natural Heritage (as Consultation Authority)

561 /

807 SEA Comments

Assessment method

The traffic-light assessment system had some advantages at MIR stage, in the 'sieving' of a larger number of proposed sites. However, we consider that it does not produce an effective SEA in this case. As it is simply a check-list of overlapping geographic datasets, we have not checked the assessments in detail. The pre-determined maximum levels of environmental impact, set out in Table 1 of the MIR IER, mean this method masks the complexity of potential impacts. Also it cannot pick out positive effects from among the impacts. This in turn appears to discourage robust identification of mitigation (discussed under Mitigation below).

We raised the above points in our response to the MIR IER. However the current consultation further highlights these shortcomings. The principal example is the way the assessment deals with the Green Belt designation. For all three sites it merely assigns 'red lights' under Green Belt, and calls for "further investigation, ...assessment and potential mitigation". Instead, the AER should have been able to partly quantify the extent of the adverse impacts, and to propose how the loss of Green Belt to housing might be offset by positive measures, principally the provision of new high-quality Green Belt edge. In this way the SEA would have been helping the Green Belt Review to minimise a net loss of Green Belt functions and ideally to enhance them.

We therefore recommend that the traffic-light system should be revised for the Environmental Report of the Proposed Plan. We suggest the more common '+ / -' system could be used instead, as we recommended in our response of February 2011.

Nick Everett

Scottish Natural Heritage (as Consultation Authority)

561 /

808 SEA Comments

Mitigation

We consider that simply stipulating adherence to development plan policies is not mitigation in SEA terms. Instead, the SEA would add more value to the process if specific mitigation was identified, as we argued in our response regarding the MIR IER. In particular, this was the ideal opportunity to explore whether leaving parts of the sites undeveloped (notably Summerston-Lambhill-Milton) might avoid or acceptably reduce impacts on natural heritage interests. Should the proposed mitigation appear not achievable for any site, then the SEA would have flagged up residual environmental impacts.

In addition it seems inappropriate to rely on policies from the outgoing City Plan 2, unless a commitment has been made to retain them unaltered.

Lorna Maclean

SEPA (as Consultation Authority)

565 /

826 **SEA Comments**

It is noted that the assessment methodology is the same as that used for the MIR Interim Environmental Report; it would have been useful to have included a key to the traffic lights system so that reference to the previous assessment wasn't necessary.

In our response to the actual plan we have requested that an FRA or other relevant information be submitted at the planning application stage for the Robroyston site (0080). This is so that the risk from the minor watercourse that runs on the boundary of the site can be assessed. The additional ER assessment does not highlight any risk of flooding as the Robroyston site is not within a 1 in 200 flood outline. The assessment should identify potential risk of flooding to sites which are both within and outwith the 1 in 200 flood outline.

Clare Darlaston

Scottish Wildlife Trust

576 /

866 **SEA Comments**

The red/amber/green notation on the impact check list is not defined, therefore it is not clear what the different colours indicate, clearly not that red is most serious and green least, as proposal 0079 indicates that being within the buffer zone of a SSSI is less of a constraint than being close to a high tension electricity safety zone.

