



The Scottish Parliament
Pàrlamaid na h-Alba

Development and Regeneration Services
Glasgow City Council
231 George Street
Glasgow
G1 1RX

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My ref: BD18069/JA



City Development Plan 2 ‘Call for Sites’

I understand that Glasgow City Council (GCC) are currently undertaking a ‘Call for Sites’ and ‘Call for Ideas’ in relation to the City Development Plan 2 (CDP2), which gives stakeholders the opportunity to put forward ideas for sites that they think should be included in the CDP2 for development.

I note that there is no option in this exercise to highlight sites that should **not** be considered for development, which I appreciate is not deliberate and part of the process. That said, I wish to make representations with regards to the site bounded by the River Kelvin, Blackhill Road and Balmore Road in Ward 16 in the north of Glasgow.

As you will be aware, I have made a number of objections in the past in relation to proposed developments on this site. The basis for these objections includes the risk of increased traffic to the area, the effect development would have on the local environment, the impact on local services and infrastructure, and the risk green belt development poses to the regeneration of vacant sites awaiting developer interest.

These objections remain relevant, and it is clear from National Planning Framework 4 (NPF4) and the evidence report for the City Planning Development Plan 2 (CDP2) that development on this part of Glasgow’s green belt would be at odds with the Scottish Government and Glasgow City Council’s visions both for environmental conservation, tackling the climate emergency and directing development into the right places.

Green Belt Review

I have previously outlined my opposition to this green belt area being released for development. Glasgow City Council’s comprehensive Green Belt Review 2024 concludes that areas that make up the site contribute to the NPF4 green belt outcomes, which is in line with the recommendations of the Summerston Wider Area feasibility report. While this is encouraging, I remain concerned about the risk that repurposing this land for development would pose to not only the environment, but also the social and economic wellbeing of the area.

Bob Doris MSP

e-mail: bob.doris.msp@parliament.scot

Constituency Office, Maryhill Burgh Halls, 10-24 Gairbraid Avenue, Glasgow G20 8YE

Phone: 0141 946 7700

A salient point is that north Glasgow already has sufficient non-green belt land for appropriate mixed-tenure housing development - the City Development Plan 2 (CDP2) evidence report states that 99% of residents in Ward 16 reside in close proximity (500m) of derelict or vacant land. The presence of these individual sites in a neighbourhood can have an enormous impact on safety, health, and residents' sense of pride in their community, however are broadly unpopular to develop due to the expense of remediating the land. Pursuing development on the green belt rather than focussing on regeneration of existing areas risks further leaving these areas behind and contradicts the Scottish Government's NPF4, which places a strong emphasis on rebalancing development through compact urban growth to create sustainable and liveable places.

The guidance for the 'Call for Sites' suggests supporting existing masterplans aiming to regenerate vacant land at Hamiltonhill and Cowlairs, which would be a more sustainable option than encroaching into north Glasgow's green belt. Cowlairs has historically struggled with a lack of interest from private developers, and this would only be exacerbated by the development of suburban land on the boundary of the ward. It is therefore essential that brownfield and greyfield sites are prioritised when considering development in the north of Glasgow.

Environment and access to green space

Alongside the need to direct development appropriately, the environmental impact any development on this land would cause cannot be overstated. The Blackhill site is adjacent to a number of important ecological sites, including Possil Marsh Nature Reserve, a Site of Special Scientific Interest. This is an invaluable natural environment which provides a habitat for locally rare fauna and flowers, as well as migrating birds and waterfowl. The surrounding green land and the marsh's freshwater loch supports this environment and its composition of marsh, swamp and fen make it especially vulnerable to the effects of large-scale residential development, which has already eliminated similar habitats across much of lowland West Central Scotland.

Possil Marsh is only one part of the wider natural environment surrounding the site at Blackhill. The River Kelvin runs to the north of the area and acts as an important green/blue corridor which sustains bio-diversity right into the urban heart of the west of the city. Development in the area bounding the river runs the risk of jeopardising this essential natural link, and furthermore increase pressure on drainage which would have wide-reaching effects further downstream. I have previously advocated for a proper Flood Risk Assessment to be commissioned before any development is considered for this area.

Access to green space is a key priority in the Scottish Government's National Planning Framework, and it is essential for people's physical and mental wellbeing. It is therefore crucial that any consideration to development must come after a thorough assessment and upgrading process to existing path networks, which are currently unsuitable and fragmented, to ensure that access to green space is not only maintained but enhanced. Previous applications for development have failed to present a joined-up approach to this issue, which must be addressed if we are to respond to the infrastructural needs of the community.

Transport and Increased Traffic

Based on previous applications, it can be expected that any proposed development on this site would be compromised of owner-occupier multi-car households, which combined with the lack of public transport and safe active transport alternatives will inevitably increase the level of traffic on the narrow Blackhill Road.

In any case, any potential development or change of use would have to be preceded by improvements to local road infrastructure, but it is essential that this is not done in isolation. Any upgrading of the currently unsuitable Blackhill Road to serve a new local development would likely be ineffective unless congestion is alleviated at pinch-points such as Saracen cross, and the routes extending through to Maryhill Road, which see consistent heavy traffic at peak times.

This could be supported by improvements to active travel infrastructure, which could provide safer routes for by way of segregated cycle lanes to allow access to amenities and green space, the importance of which I've highlighted above. Improvements to roads would also support the reliability of public transport and could even make the implementation of new links a viable option, helping in turn to improve connectivity across the wider Summerston area.

Allowing development before these enhancements to connectivity are made would risk further isolating a community that currently relies heavily on personal vehicles to access amenities, public services and opportunities.

Conclusion

I am conscious that without considered intervention, this part of Summerston and any future development in the area will be deprived of the opportunity to become more sustainable, liveable and productive in line with the principles of the National Planning Framework 4.

Please accept this submission as my sustained **objection** to the green belt site bounded by the River Kelvin, Blackhill Road and Balmore Road being released for development as part of the City Development Plan 2.

Yours sincerely,

A handwritten signature in black ink that reads "Bob Doris". The signature is written in a cursive, slightly slanted style.

Bob Doris MSP

Member of the Scottish Parliament for Glasgow Maryhill and Springburn constituency (SNP)