



The Scottish Parliament
Pàrlamaid na h-Alba

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

Ref: GB/BD5912

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**Erection of residential development, access and associated works | Site Bounded By River
Kelvin/Blackhill Road/ Balmore Road Glasgow
Ref: 19/03776/PPP**

I wish to make representations with regards to the above consultation. My response should be considered as an objection to the development.

Transport and Increased Traffic

I am concerned about the increase in traffic and its negative impact. I note the developer's plans. These include a set of traffic lights and a roundabout. This will not solve the issues the development will create. Blackhill Road is a narrow road which will struggle to accommodate additional traffic. A bus service on this road would be unlikely to be suitable given the road itself as well as unlikely to be commercially viable. There are also concerns currently regarding the junction at Balmore Road which are likely to only be exacerbated.

The other access route to Blackhill Road is through Summerston at Invershiel Road. There is a pattern to traffic flow each day. Traffic flows mainly through Summerston onto Maryhill Road in the mornings from both the longstanding homes within the area, the modern developments in recent years at Blackhill Road (which are owner occupier houses with multiple car ownership), from East Dunbartonshire and from other parts of north Glasgow. Maryhill Road is already overly congested. The flow of traffic is reversed in the evenings.

One key reason for much of this traffic flow are motorists seeking to avoid major congestion issues at Saracen. This puts significant burdens through Summerston and exits onto Maryhill Road at Shiskine Drive and Caldercuilt Road onto Maryhill Road. Blackhill Road needs upgraded to sustain traffic and any potential future bus service. However this may only make traffic flow through Summerston and onto Maryhill Road worse as more drivers switch from the congested Saracen junction. The poor quality of Blackhill Road is one of the few deterrents for motorists to avoid the area and persevere with the congested Saracen Cross. I would therefore caution against any road upgrades / widening as it may serve to increase its use as a "short-cut" for people in Milngavie/ Bishopbriggs and the north to get to areas in the west of Glasgow and city centre. Any upgrading of the road should be carried out in conjunction with also tackling congestion at Saracen.

Pressing on with a new development at Blackhill Road will also put additional pressure on Summerston and the below-standard road and lead to increased traffic during the construction phase. I believe the development will increase car usage. The developer's proposal to "Influence Travel Behaviour" does not go anywhere near far enough. The proposals to build a small number of car share spaces (2 in the first units 300 developed), and to produce an online travel pack, will do little if anything to influence behaviour. I do note the plans for a shuttle bus to the station, which is a small but welcome move, but one I fear would disappear in the medium to long term. It is not possible to secure such commitments in the long term, for the next 10 years for instance.

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I am concerned that residents will not have easy access to public amenities, transport or safe active travel links. I would need significant reassurances that access to and capacity within local school provision will be suitably managed; as well as ensuring travel options to secondary schools, shopping centres, sports centres and hospitals and so on are fully developed. It is desirable to 'knit in' any new development to such local services as opposed to a default where residents go to Milngavie and Bishopbriggs by car. Indeed on that point there may be an increasing need to provide new public transport links from Summerston to East Dunbartonshire. They simply do not exist.

I would also ask that if this development is to go ahead, as a minimum, the development should provide electric car charging points as standard, given the almost certain high car ownership.

Paths Network

I note the developer's intention to include new walkways in the plan which will connect to existing paths. This may aid cycle use in the development and onwards to Balmore Road to the east. I would raise concerns on the developer's reliance on the existing path network, and in particular to the West of Scotland Science Park. This could be an important cycle route, however the existing path is sub-standard and often suffers from boggy underfoot conditions. If planning permission is given, the developer should be asked to upgrade these paths. Furthermore any paths or cycle network should tie in more widely to Summerston and East Dunbartonshire. For instance segregated cycle tracks on both Blackhill Road and Balmore Road; and clear cycle route in Summerton and Acre.

Feasibility Study

I had previously raised my concerns about the release of the greenbelt back in 2015. At that time the release of land, traffic and infrastructure, flooding, drainage and other such matters were to be considered by a feasibility study. It is disappointing that five years later this has still not happened and the developer has decided to apply for planning permission, partially to accelerate this process.

I feel it makes it very difficult to give a full comment on the proposal without the feasibility study being completed. As such, I would ask that the planning proposal is rejected given the feasibility study is not finalised. If the feasibility study does suggest the land could be used for this type of development, the planning application should then be re-submitted and allow the community to make an informed opinion on the application.

Furthermore, as the study is not yet complete, GCC and other agencies may not be able to fully plan resources. Local schools are already running close to capacity and consideration needs to be given to developing additional capacity as required.

Housing Needs

The City Development Plan states aims for Housing Land Requirements. I understand this development in Summerston would be classified as potential additional Private Sector Land supply.

Summerston is an area with high social housing tenure. I welcome the addition of increased owner occupier homes in recent years but believe that it is important to secure a housing mix. To solely develop 500 owner occupiers' houses on this site will not support a mixed tenure approach within Summerston as a whole. It ignores (and could compromise) mixed tenure opportunities at Barrasdale, Lyndale and Shiskine.

Indeed the scale of the development which is zoned as "Private Sector" may potentially lead to private sector developments not being developed in other gap or brown field sites where there is a lack of this housing tenure mix. Allowing the private sector to cherry pick the 'best' sites will mean less private investment elsewhere. This application is therefore likely to see less private housing investment in social housing areas where we want to see a better tenure mix

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

Greenbelt and Environment

I had previously, in 2015, submitted my objection this area being released from Green Belt for development. The continuing erosion of Glasgow's greenbelt was of major concern in 2015, but as we have now declared a Climate Emergency, this is even more critical. Aside from the clear environmental benefits of protecting our city's green belt, there are social and economic benefits from appropriate development on the many vacant spaces within the city. There is no shortage of brownfield spaces and gap sites within the city, which although potentially more expensive to redevelop, would be a more appropriate priority. Development on brownfield and greyfield sites must be prioritised. They are either better integrated (or have a greater opportunity to be integrated) into the city's transport network than this green belt release.

The Summerston site is by far the largest site recommended for green belt release, and any proposal of that scale deserves a rethink given the City's commendable commitment to tackling the climate emergency. GCC itself did not deem the land as needed for housing supply within the initial draft city plan but reversed this initial position following objections from the land owners. I accept this is a valid part of the city plan development process but would use this to illustrate that the decision to consider the release of the land for development must have been borderline. It is now reasonable to review this once more.

I agree with the comments made by Scottish Natural Heritage in response to the Proposed Additional Sites Consultation in 2012, namely that allocation of the site for development would not be acceptable due to adverse impacts on landscape, character and visual amenity within a Site of Special Landscape Importance. While SNH agreed to the principle of a feasibility study into the potential for development in the wider greenbelt area, this is not an endorsement that development should take place.

It is also questionable that any changes to the land use designation should be made to this land in advance of the outcomes of the feasibility study being available. Indeed it is deeply disappointing the application has been received ahead of the outcome of a feasibility study.

I also understand there is a risk of flooding if this site is developed, particularly related to the River Kelvin and other minor watercourse running through the site. The Scottish Environment Protection Agency indicated that a Flood Risk Assessment is required to determine how much of the site is developable. Again, it would seem premature to re-designate this area as residential and then have to rely on further assessments to determine which parts of the site might be appropriate for development. This cannot make for a coherent and well thought out masterplan for meeting future housing demand.

To the east of the proposed greenbelt release, Possil Marsh is an important nature reserve and Site of Special Scientific Interest, of both flora and fauna. The reserve was once part of an extensive system of lochs and marshes which extended throughout much of lowland West Central Scotland. However, centuries of drainage and reclamation have resulted in the elimination of much of this system. Due to its geographic position, the marsh is particularly vulnerable from industrial and residential development. The City Development Plan is of key importance in ensuring that new development sites do not further impact on Possil Marsh. It is difficult to see how the approval of large scale development site immediately adjacent to the nature reserve can in any way be compatible with the conservation of the wildlife who live on the reserve and surrounding fields.

Summary

In conclusion, my concerns about this development concern the increase in traffic for Summerston/ Maryhill Road, the impact to the local environment, the additional strain on resources and the detriment to delivering a housing tenure mix across parts of north Glasgow.

Consequently please accept this as my objection.

Yours sincerely,



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