CfS250037

P471

Q10

Friends of Linn Park ask for the following item to be **removed** from CDP2 in its entirety. We ask the area to be re-designated, or to remain designated as Green Belt.

Site Ref: CfS250037

Simshill Road/ Linnview Avenue Site Ref: CfS250037	Brownfield Development Opportunity Area (ha): 0.38	**Natural Environment:** 1. If loss of trees is justified, compensatory planting will be required, preferably onsite. 2. Nature Network Regional Core Area. Protect, manage and augment Nature Networks. **Open Space:** 3. If residential proposed, contribution towards the maintenance of Linn Park. 4. If residential proposed, contribution required towards outdoor sports provision. 5. If residential proposed, contribution required towards allotments/growing space.

Q11

Site Ref: CfS250037

This site is currently designated Green Belt. Friends of Linn Park ask this designation remains. In the current City Development Plan there is the following;

“The City’s Green Belt has contracted significantly in recent years, particularly following the release of land for development in City Plans 1 and 2. The Green Belt review concluded there is little scope for any further contraction of Glasgow’s Green Belt if it is to continue to meet environmental objectives.”

In Supporting Guidance 6 – Green Belt & Green Network for CDP2 (approved in 2024) there is the following;

“3.1 The Glasgow Green Belt is a key strategic policy tool that, in recent decades, has helped direct most new investment to brownfield sites within the urban area. The area of Green Belt within the City has always been relatively limited in extent and its area has shrunk further in recent years with the strategic release of Green Belt land to meet housing demand.

3.2 As such, it is important that the Council continues to exercise a strong presumption against development that would adversely affect the function or integrity of the remaining Green Belt.”

National Planning Framework 4 states;

Compact Urban Growth. We will limit urban expansion so we can optimise the use of land to provide services and resources, including carbon storage, flood risk management, blue and green infrastructure and biodiversity.

The proposal that site ref CfS250037 is to be removed from green belt and proposed for housing is against the previous development plan, against the supporting evidence for this plan and in direct contradiction with National Planning Framework 4.

National Planning Framework 4; Policy 8 states;

“Green belts should be identified or reviewed as part of the preparation of LDPs. Boundary changes may be made to accommodate planned growth, or to extend, or alter the area covered as green belt. Detailed green belt boundaries should be based on evidence and should be clearly identified in plans.”

CDP2 makes no reference to removing green belt in Linn Ward area in its spatial strategy 3.

3. Green Belt – Protect and enhance the function and integrity of the Green Belt.	The Green Belt is designated to manage development pressure around the City's edges, to help direct development to the most sustainable locations and promote the regeneration of the urban area. Boundary changes have been made to exclude housing sites from the green belt to deliver on the long-committed Community Growth Areas at Robroyston, Easterhouse and Carmyle as well as land at Milton to complete planned regeneration of the wider neighbourhood.	Figure 10 NPF4 Policy 8 CDP2 Place Policies 4, 5, 6 CDP2 Topic Policy 7

The Green Belt review for CDP2 declares Area 3A to contribute to the National Planning Framework 4 outcomes. (Green Belt Review 2024, CD020, paragraph 4.34) There is no suggestion in the review that any part of it is less useful than another. There is no suggestion in the review that the total area is excessive.

Friends of Linn Park recognise there is a housing need in Glasgow. We understand that CDP2 must identify sites to meet that need.

12. Housing – Allocate land to support the delivery of new energy efficient homes to meet residents' housing needs (including affordable and other specialist types of housing).	The Local Housing Land Requirement (LHLR) for CDP2 is 22,569. The spatial strategy identifies land that will deliver over 31,000 homes to provide a Deliverable Housing Land Pipeline. This pipeline therefore provides flexibility in delivering the LHLR and housing that will be delivered in the short, medium and long term. Capacities, phasing and levels of housing growth are highlighted in the key diagram. The Place Policy spatial strategies provide further information about distribution of sites across the city. The Place Policies include all the housing sites, and the Delivery Programme sets out a detailed Deliverable Housing Land Pipeline. The sites meet a range of housing needs, some of which will be delivered through existing partnerships and regeneration initiatives. Sites have been assessed to ensure they are in locations that can create quality places for people to live, and which are consistent with the principles of local living and an infrastructure first approach.	Figure 8 and 12 NPF4 Policy 16 CDP2 Place Policies 2, 3, 4, 5, 6 CDP2 Topic Policy 12, 13, 14

The LHLR is stated as 22,569. This already includes a 25% delivery flexibility. The intention of CDP2 to deliver over 31,000 homes is in excess of the need and in excess of delivery flexibility also by some way.

There is no housing need identified specifically within Linn Ward.

Friends of Linn Park do not recognise any housing need identified by the supporting guidance which justifies the removal of green belt designation in this area or forming a

housing site on open space. If this proposal were to come forward under the current City Development Plan it would not fulfil the required specifications required for Green Belt development under the National Planning Framework 4; Policy 8.

We consider it important to note the area to the east of this site is also Green Belt, and that forms a Green Wedge together with this proposed site. Some of this area formed part of the former Simshill School site and was required to remain in suitable uses when the planning application was determined (application 15/01606/DC). The area was kept free from development and is used for SUDS and amenity purposes compatible with continuing to provide Green Belt objectives. To now describe it only as 'open space' fails to recognise this stipulation – and if this development site is formed in this CDP2 then this area will also be isolated from Green Belt and will not be providing so useful a task in terms of green wedge or in connecting nature networks.

Friends of Linn Park do not recognise that any evidence has been presented to demonstrate why the existing Green Belt designation is being removed, or that any justification has been provided for the proposed change in designation.

The site proposed is formed on land currently used by Linn Park Golf Course. The golf course including the car park and pavilion building were found to be community assets in scope for the 'People make Glasgow Communities' programme and that this community interest has been ignored when bringing forward CDP2. Ignoring community interest is contrary to Community Wealth Building under policy 25 of the National Planning Framework 4.

GCC Open Space Strategy states;

"5.23 At present Glasgow has six public golf courses (three 18-hole and three 9-hole) operated by Glasgow Life. Low usage figures and a substantial annual deficit incurred in running the courses led to the Council consulting on the future of these courses in summer 2019. The outputs from the consultation will require to be taken into account in the OSS Delivery Plan process. In the meantime, the golf courses continue to be protected as open space."

Friends of Linn Park are not aware of the delivery plan being published or any consultation regarding the future of Linn Park Golf Course taking place. A 'redundancy assessment' under the Council's Open Space Strategy has not been completed for Linn Park Golf Course. Consultation on, or assessment of, the future of Linn Park Golf Course is required before proposing any alternative land use including housing, food growing, tree planting and cemetery expansion.

This site also carries a 'Site of Special Landscape Importance'. The reference seems to have changed to be referred to as ‘Local Landscape Area’ in the new CDP2 and creating a housing site in this area would significantly alter the landscape appearance and surely would go against any special importance recorded.

Other proposals within the CDP2 are in direct contradiction with the effect a housing site would have in this area. For example;

5.31 Development proposals that directly or indirectly affect a Local Landscape Area (LLA), as shown on the Proposals Map, will only be supported where the proposed development would have a positive impact on the character or qualities of the site.

A housing site on this ‘Local Landscape Area is contrary to policy 4 of National Planning Framework 4 which states “LDPs will identify and protect locally, regionally, nationally and internationally important natural assets, on land and along coasts. The spatial strategy should safeguard them and take into account the objectives and level of their protected status in allocating land for development.”

National Planning Framework 4 promotes the principle of ‘local living’. “Quality homes will be better served by local facilities and services by applying the principles of local living to development proposals. The concept of 20 minute neighbourhoods will help to support this, particularly in more urban areas”

The inclusion of proposed site CfS250037 seems to be contrary to this principle as it scores RED in categories such as Community Facilities, Health, Public Transport and Active Travel.

This site CfS250037 scores 2 double negatives at ER Stage One Development Proposals Assessment, 6 negatives, and 8 neutral scores out of a possible 23 categories. It scores positive in only 7 of these categories. Friends of Linn Park are concerned that with a site scoring so many negative aspects it can be considered to be taken forward for development.

National Planning Framework 4; Policy 3 states

“LDPs should protect, conserve, restore and enhance biodiversity in line with the mitigation hierarchy. They should also promote nature recovery and nature restoration across the development plan area, including by: facilitating the creation of nature networks and strengthening connections between them to support improved ecological

connectivity; restoring degraded habitats or creating new habitats; and incorporating measures to increase biodiversity, including populations of priority species"

It seems contrary to this policy to remove Green Belt without real justification to form housing site CfS250037. There is no recognition of this policy within the proposal in CDP2.

National Planning Framework 4; Policy 3 states

"Development proposals will contribute to the enhancement of biodiversity, including where relevant, restoring degraded habitats and building and strengthening nature networks and the connections between them. Proposals should also integrate nature-based solutions, where possible."

and

"Proposals for local development will include appropriate measures to conserve, restore and enhance biodiversity, in accordance with national and local guidance. Measures should be proportionate to the nature and scale of the development"

It seems contrary to this policy that the requirement to conserve, restore and enhance biodiversity is not included in the description of this site. With no reference to the neighbouring Local Nature Reserve, and by its creation cutting off a further area of Green Belt the creation of this housing site would be detrimental to biodiversity and nature networks.

This Green Belt site currently provides a hard standing parking area which is used to enable access to Linn Park including the golf course and other amenities of the park. Friends of Linn Park consider removal of this provision would make the park less accessible and create issues for surrounding streets.

Other sites considered under CDP2 include the following stipulation;

> "2. Assessment of impact of removal of car parking required before development can be considered."

Friends of Linn Park question why this has not been included or considered for site CfS250037.

National Planning Framework 4 includes the following;

"Policy 13 is also clear that the views of disabled people must be sought when seeking to reduce reliance on the car including by managing car parking provision."

Friends of Linn Park are not aware of any views being sought of disabled people when seeking to remove this parking area, and we also draw your attention again to the RED

scores for public transport received in the site assessment. Friends of Linn Park have undertaken a survey of use at the car park which is attached to this response.

Friends of Linn Park have prepared a document which demonstrates public interest in this matter which is attached to our consultation response. We have also undertaken a car park survey which is attached.

Friends of Linn Park have prepared a document describing the landscape, nature and other benefits of this Green Belt land to be considered.

Friends of Linn Park have received letters from Buglife, RSPB, Planning Democracy and other members of the public which we have included in a document which is attached.

Friends of Linn Park will only regard the representation as resolved if the change is made in full, and wishes to be heard at examination.