



|                      |
|----------------------|
| Comm No:             |
| Rep No:              |
| For Council Use Only |

## PROPOSED LOCAL DEVELOPMENT PLAN FOR GLASGOW (THE CITY DEVELOPMENT PLAN)(CDP)

### REPRESENTATION FORM

The Proposed CDP is now available for representations to be made. We would like your views on any of the issues, policies or development proposals set out in the CDP or in the supporting documents, including the Strategic Environmental Assessment Revised Interim Environmental Report. This form should be used for all representations – the Council will only accept representations made using this form.

Completed forms must be received by **4pm on Friday 27 June 2014** using one of the following methods:  
(Forms received after this date will not be accepted)

Post: Development Plan Team  
Development and Regeneration Services  
Glasgow City Council  
231 George Street  
Glasgow, G1 1RX

On-line: electronic forms can be completed and automatically submitted at: [www.glasgow.gov.uk/developmentplan](http://www.glasgow.gov.uk/developmentplan)

Email: forms can be downloaded, completed and sent to [developmentplan@glasgow.gov.uk](mailto:developmentplan@glasgow.gov.uk)

If you are unsure of how to complete this form, further advice can be found on our website ([www.glasgow.gov.uk/developmentplan](http://www.glasgow.gov.uk/developmentplan)) or can be obtained by emailing [developmentplan@glasgow.gov.uk](mailto:developmentplan@glasgow.gov.uk) or by phoning 0141 287 8608.

PLEASE USE A SEPARATE FORM FOR EACH INDIVIDUAL REPRESENTATION – i.e. each aspect of the Proposed CDP or supporting document you wish to comment on.

#### 1. Please provide us with your contact details.

Please provide names and contact details for yourself, the company, group, individual or organisation that you represent. Please note that representations cannot be treated confidentially and will be scanned and made available for public inspection, including online, except any information which would be subject to the Data Protection Act 1998. They may also be passed to the Scottish Government's Directorate for Planning and Environmental Appeals in order that they can involve you in any Examination of the Plan.

Only representations that include a name and a method of contact (by email or post) will be validated.

Name:

Organisation Name:   
(if applicable)

Address:

Telephone:

Email:

Please check box if you do not wish to be contacted by email:

(contacting you by email helps us reduce costs and improve efficiency - we will contact you by email unless specifically asked not to)

Agent's Name:

(If you provide an Agent's name the Council will direct all subsequent correspondence to your Agent)

Agent's  
Address:

Telephone:

Email:

**2. Please indicate which document you are making a representation/comment on.**

Proposed City Development Plan

Habitats Regulations Appraisal

SEA Revised Interim Environmental Report

Other (please specify)

Please note that only representations on the Proposed City Development Plan will be considered at the LDP Examination. Comments on other documents will be considered by the Council and, where relevant to the consideration of unresolved representations on the Proposed CDP, may also be taken into account by the Reporter at the CDP Examination. See Guidance Note for further information.

**3. Please tell us which part of the above document you are making a representation on.**

Fill in all that apply:

Page Number

27 - 28

Proposal Number

Policy Number

Other

**4. Please tell us if your representation is in support of the document or whether you would wish to see it changed (i.e. your representation is an objection).**

Support

Please complete sections 6 below

Seek a change (objection)

Please complete section 5 and 6 below

**5. Please indicate what changes you would like made to the Proposed Plan.**

Publication of all the relevant Supplementary Guidance before the Plan is submitted to Ministers for Examination, to allow stakeholders to understand if the Plan policies are sufficiently comprehensive and to be satisfied that no policy requirements are being introduced through Supplementary Guidance.

## 6. Representation.

Your representation should be no more than 2000 words. You should explain clearly and concisely your reasons for seeking a change to, or supporting, this aspect of the Proposed CDP/Supporting Document. There will be no automatic opportunity to expand on your representation later in the process. Limited supporting documents will be accepted but, if you are attaching additional documents as part of Representations which simply state "see attached" or similar will not be accepted and will be returned.

Page 28 sets out a schedule of proposed Supplementary Guidance along with an indication of when each might be published – after Plan publication; by the point of Plan adoption; or post-adoption. Supplementary Guidance (SG) now forms part of the Development Plan once it has undergone consultation and approval. Circular 6/2013 summarises the provisions of the Act and Regulations in respect of Supplementary Guidance (paragraphs 135 – 145). Paragraph 139 sets out in a table what should be included in the development plan, and what can be left to SG. The test is whether the Plan contains sufficient detail in its policies to allow applicants to understand what is being asked of them, with SG restricted to the detail of how the policies will work.

Reporters will not examine the detail of SG but will, in response to representations, consider whether the Plan policies contain sufficient justification and detail on how they are intended to work, or whether some of these matters have been included in the SG, and it may make changes to the Plan to ensure that the policy framework is clear and robust.

In respect of policies which have financial implications, in terms of developers being expected to fund infrastructure and amenities in whole or in part, then it is an established principle that developers are entitled to expect as much clarity as possible about likely costs to them.

If the SG is not available for comment alongside the Plan, then it is not possible for objectors to see if that balance between policy and further explanatory detail is correct. Nor is it possible to be sure what the cost implications of policies might be. Homes for Scotland therefore reserves the right to add to any of its representations if the published Guidance raises issues around the balance between Plan and SG content.



|                      |
|----------------------|
| Comm No:             |
| Rep No:              |
| For Council Use Only |

## PROPOSED LOCAL DEVELOPMENT PLAN FOR GLASGOW (THE CITY DEVELOPMENT PLAN)(CDP)

### REPRESENTATION FORM

The Proposed CDP is now available for representations to be made. We would like your views on any of the issues, policies or development proposals set out in the CDP or in the supporting documents, including the Strategic Environmental Assessment Revised Interim Environmental Report. This form should be used for all representations – the Council will only accept representations made using this form.

Completed forms must be received by **4pm on Friday 27 June 2014** using one of the following methods:  
(Forms received after this date will not be accepted)

Post: Development Plan Team  
Development and Regeneration Services  
Glasgow City Council  
231 George Street  
Glasgow, G1 1RX

On-line: electronic forms can be completed and automatically submitted at: [www.glasgow.gov.uk/developmentplan](http://www.glasgow.gov.uk/developmentplan)

Email: forms can be downloaded, completed and sent to [developmentplan@glasgow.gov.uk](mailto:developmentplan@glasgow.gov.uk)

If you are unsure of how to complete this form, further advice can be found on our website ([www.glasgow.gov.uk/developmentplan](http://www.glasgow.gov.uk/developmentplan)) or can be obtained by emailing [developmentplan@glasgow.gov.uk](mailto:developmentplan@glasgow.gov.uk) or by phoning 0141 287 8608.

PLEASE USE A SEPARATE FORM FOR EACH INDIVIDUAL REPRESENTATION – i.e. each aspect of the Proposed CDP or supporting document you wish to comment on.

#### 1. Please provide us with your contact details.

Please provide names and contact details for yourself, the company, group, individual or organisation that you represent. Please note that representations cannot be treated confidentially and will be scanned and made available for public inspection, including online, except any information which would be subject to the Data Protection Act 1998. They may also be passed to the Scottish Government's Directorate for Planning and Environmental Appeals in order that they can involve you in any Examination of the Plan.

Only representations that include a name and a method of contact (by email or post) will be validated.

Name:

Organisation Name:   
(if applicable)

Address:

Telephone:

Email:

Please check box if you do not wish to be contacted by email:

{contacting you by email helps us reduce costs and improve efficiency - we will contact you by email unless specifically asked not to}

Agent's Name:

(If you provide an Agent's name the Council will direct all subsequent correspondence to your Agent)

Agent's Address:

Telephone:

Email:

**2. Please indicate which document you are making a representation/comment on.**

- |                                          |                                  |                                |                       |
|------------------------------------------|----------------------------------|--------------------------------|-----------------------|
| Proposed City Development Plan           | <input checked="" type="radio"/> | Habitats Regulations Appraisal | <input type="radio"/> |
| SEA Revised Interim Environmental Report | <input type="radio"/>            | Other (please specify)         | <input type="radio"/> |
|                                          |                                  | <input type="text"/>           |                       |

Please note that only representations on the Proposed City Development Plan will be considered at the LDP Examination. Comments on other documents will be considered by the Council and, where relevant to the consideration of unresolved representations on the Proposed CDP, may also be taken into account by the Reporter at the CDP Examination. See Guidance Note for further information.

**3. Please tell us which part of the above document you are making a representation on.  
Fill in all that apply:**

|               |                                    |                 |                      |
|---------------|------------------------------------|-----------------|----------------------|
| Page Number   | <input type="text" value="41"/>    | Proposal Number | <input type="text"/> |
| Policy Number | <input type="text" value="CDP 5"/> | Other           | <input type="text"/> |

**4. Please tell us if your representation is in support of the document or whether you would wish to see it changed (i.e. your representation is an objection).**

- |                           |                                  |                                       |
|---------------------------|----------------------------------|---------------------------------------|
| Support                   | <input type="radio"/>            | Please complete sections 6 below      |
| Seek a change (objection) | <input checked="" type="radio"/> | Please complete section 5 and 6 below |

**5. Please indicate what changes you would like made to the Proposed Plan.**

Everything from paragraph 5 "New building should..." should be deleted and replaced with:  
"Developers should also consider whether the use of low and zero-carbon technologies can contribute to more energy-efficient houses in a cost-effective way."

## 6. Representation.

Your representation should be no more than 2000 words. You should explain clearly and concisely your reasons for seeking a change to, or supporting, this aspect of the Proposed CDP/Supporting Document. There will be no automatic opportunity to expand on your representation later in the process. Limited supporting documents will be accepted but, if you are attaching additional documents as part of Representations which simply state "see attached" or similar will not be accepted and will be returned.

This Policy touches on low and zero carbon issues. Table 3 is entirely inappropriate. It reflects Section 7 of the Technical Handbook, which sets out aspirational standards not yet formally required by the Building Standards. Future revisions of the Building Standards are still under review and subject to final decisions on the recommendations of the Sullivan Panel. However, Scottish Government has already made commitments to delay or slow down introduction of future increases in standards. For instance the national target of a 60% reduction in carbon emissions has already been reduced in practice to 42.8%, which affects the Gold Standard. There is no indication yet of a final date for achieving Gold Standard. The Silver Standard is now to be aligned with the proposed target improvement of the 2015 Energy standards.

It is not the place of development plans to anticipate or exceed the national Building Standards. All that does is introduce confusion and uncertainty for developers working in different plan areas. More fundamentally, each of these aspirational standards has significant implications for design, materials and construction and consequent cost implications for the finished product. It is entirely impractical for developers to design and build to different local standards, especially in a context where Modern Methods of Construction and cost-efficient production of housing rely on factory production of components, standard components, manufacture to high tolerances and so on. The timings in Table 3 no longer conform to the Government's timetable for introducing successive versions of the Building Regulations.

Development Plans should not duplicate technical matters regulated by other means such as the Building Standards. Everything from paragraph 5 "New building should..." should be deleted and replaced with "Developers should also consider whether the use of low and zero-carbon technologies can contribute to more energy-efficient houses in a cost-effective way."



|                      |
|----------------------|
| Comm No:             |
| Rep No:              |
| For Council Use Only |

## PROPOSED LOCAL DEVELOPMENT PLAN FOR GLASGOW (THE CITY DEVELOPMENT PLAN)(CDP)

### REPRESENTATION FORM

The Proposed CDP is now available for representations to be made. We would like your views on any of the issues, policies or development proposals set out in the CDP or in the supporting documents, including the Strategic Environmental Assessment Revised Interim Environmental Report. This form should be used for all representations – the Council will only accept representations made using this form.

Completed forms must be received by **4pm on Friday 27 June 2014** using one of the following methods:  
(Forms received after this date will not be accepted)

Post: Development Plan Team  
Development and Regeneration Services  
Glasgow City Council  
231 George Street  
Glasgow, G1 1RX

On-line: electronic forms can be completed and automatically submitted at: [www.glasgow.gov.uk/developmentplan](http://www.glasgow.gov.uk/developmentplan)

Email: forms can be downloaded, completed and sent to [developmentplan@glasgow.gov.uk](mailto:developmentplan@glasgow.gov.uk)

If you are unsure of how to complete this form, further advice can be found on our website ([www.glasgow.gov.uk/developmentplan](http://www.glasgow.gov.uk/developmentplan)) or can be obtained by emailing [developmentplan@glasgow.gov.uk](mailto:developmentplan@glasgow.gov.uk) or by phoning 0141 287 8608.

PLEASE USE A SEPARATE FORM FOR EACH INDIVIDUAL REPRESENTATION – i.e. each aspect of the Proposed CDP or supporting document you wish to comment on.

#### 1. Please provide us with your contact details.

Please provide names and contact details for yourself, the company, group, individual or organisation that you represent. Please note that representations cannot be treated confidentially and will be scanned and made available for public inspection, including online, except any information which would be subject to the Data Protection Act 1998. They may also be passed to the Scottish Government's Directorate for Planning and Environmental Appeals in order that they can involve you in any Examination of the Plan.

Only representations that include a name and a method of contact (by email or post) will be validated.

Name:

Organisation Name:   
(if applicable)

Address:

Telephone:

Email:

Please check box if you do not wish to be contacted by email:

(contacting you by email helps us reduce costs and improve efficiency - we will contact you by email unless specifically asked not to)



Agent's Name:

(If you provide an Agent's name the Council will direct all subsequent correspondence to your Agent)

Agent's Address:

Telephone:

Email:

**2. Please indicate which document you are making a representation/comment on.**

Proposed City Development Plan

Habitats Regulations Appraisal

SEA Revised Interim Environmental Report

Other (please specify)

Please note that only representations on the Proposed City Development Plan will be considered at the LDP Examination. Comments on other documents will be considered by the Council and, where relevant to the consideration of unresolved representations on the Proposed CDP, may also be taken into account by the Reporter at the CDP Examination. See Guidance Note for further information.

**3. Please tell us which part of the above document you are making a representation on.**

Fill in all that apply:

Page Number

44

Proposal Number

Policy Number

CDP 6

Other

**4. Please tell us if your representation is in support of the document or whether you would wish to see it changed (i.e. your representation is an objection).**

Support

Please complete sections 6 below

Seek a change (objection)

Please complete section 5 and 6 below

**5. Please indicate what changes you would like made to the Proposed Plan.**

The Policy should either state that open space contributions/provision will be required on the basis of deficiencies in provision arising as a consequence of new development, or that space standards derived from the Open Space Strategy will apply.



## 6. Representation.

Your representation should be no more than 2000 words. You should explain clearly and concisely your reasons for seeking a change to, or supporting, this aspect of the Proposed CDP/Supporting Document. There will be no automatic opportunity to expand on your representation later in the process. Limited supporting documents will be accepted but, if you are attaching additional documents as part of Representations which simply state "see attached" or similar will not be accepted and will be returned.

It is clear from the Plan that the Council has yet to complete an Open Space Strategy to guide requirements for open space provision. SPP and PAN65 expect that a development plan will be informed by an OSS. While the Council has produced mapping of open spaces to be protected in the plan, it then states that these will change over time. Of greater concern, it again states that the detail of what will be required of developers in terms of provision of, or contributions to, open space will be set out in Supplementary Guidance.

This is unacceptable. It should be clear, as a minimum, that the policy requirement in relation to open space will either be a contribution assessed on local deficiencies in access to suitable open spaces, or a contribution based on defined standards of provision. That is the critical policy requirement which must be clear in the Plan. As set out in Circular 6/2013, the precise methods of calculating the contribution can then be set out in Supplementary Guidance.



|                      |
|----------------------|
| Comm No:             |
| Rep No:              |
| For Council Use Only |

## PROPOSED LOCAL DEVELOPMENT PLAN FOR GLASGOW (THE CITY DEVELOPMENT PLAN)(CDP)

### REPRESENTATION FORM

The Proposed CDP is now available for representations to be made. We would like your views on any of the issues, policies or development proposals set out in the CDP or in the supporting documents, including the Strategic Environmental Assessment Revised Interim Environmental Report. This form should be used for all representations – the Council will only accept representations made using this form.

Completed forms must be received by **4pm on Friday 27 June 2014** using one of the following methods:  
(Forms received after this date will not be accepted)

Post: Development Plan Team  
Development and Regeneration Services  
Glasgow City Council  
231 George Street  
Glasgow, G1 1RX

On-line: electronic forms can be completed and automatically submitted at: [www.glasgow.gov.uk/developmentplan](http://www.glasgow.gov.uk/developmentplan)

Email: forms can be downloaded, completed and sent to [developmentplan@glasgow.gov.uk](mailto:developmentplan@glasgow.gov.uk)

If you are unsure of how to complete this form, further advice can be found on our website ([www.glasgow.gov.uk/developmentplan](http://www.glasgow.gov.uk/developmentplan)) or can be obtained by emailing [developmentplan@glasgow.gov.uk](mailto:developmentplan@glasgow.gov.uk) or by phoning 0141 287 8608.

PLEASE USE A SEPARATE FORM FOR EACH INDIVIDUAL REPRESENTATION – i.e. each aspect of the Proposed CDP or supporting document you wish to comment on.

#### 1. Please provide us with your contact details.

Please provide names and contact details for yourself, the company, group, individual or organisation that you represent. Please note that representations cannot be treated confidentially and will be scanned and made available for public inspection, including online, except any information which would be subject to the Data Protection Act 1998. They may also be passed to the Scottish Government's Directorate for Planning and Environmental Appeals in order that they can involve you in any Examination of the Plan.

Only representations that include a name and a method of contact (by email or post) will be validated.

Name:

Organisation Name:   
(if applicable)

Address:

Telephone:

Email:

Please check box if you do not wish to be contacted by email:

(contacting you by email helps us reduce costs and improve efficiency - we will contact you by email unless specifically asked not to)

Agent's Name:

(If you provide an Agent's name the Council will direct all subsequent correspondence to your Agent)

Agent's Address:

Telephone:

Email:

**2. Please indicate which document you are making a representation/comment on.**

- |                                          |                                  |                                |                       |
|------------------------------------------|----------------------------------|--------------------------------|-----------------------|
| Proposed City Development Plan           | <input checked="" type="radio"/> | Habitats Regulations Appraisal | <input type="radio"/> |
| SEA Revised Interim Environmental Report | <input type="radio"/>            | Other (please specify)         | <input type="radio"/> |
|                                          |                                  | <input type="text"/>           |                       |

Please note that only representations on the Proposed City Development Plan will be considered at the LDP Examination. Comments on other documents will be considered by the Council and, where relevant to the consideration of unresolved representations on the Proposed CDP, may also be taken into account by the Reporter at the CDP Examination. See Guidance Note for further information.

**3. Please tell us which part of the above document you are making a representation on.**

Fill in all that apply:

|               |                                     |                 |                      |
|---------------|-------------------------------------|-----------------|----------------------|
| Page Number   | <input type="text" value="55"/>     | Proposal Number | <input type="text"/> |
| Policy Number | <input type="text" value="CDP 10"/> | Other           | <input type="text"/> |

**4. Please tell us if your representation is in support of the document or whether you would wish to see it changed (i.e. your representation is an objection).**

- |                           |                                  |                                       |
|---------------------------|----------------------------------|---------------------------------------|
| Support                   | <input type="radio"/>            | Please complete sections 6 below      |
| Seek a change (objection) | <input checked="" type="radio"/> | Please complete section 5 and 6 below |

**5. Please indicate what changes you would like made to the Proposed Plan.**

- Plan for the full SDP requirement plus generosity
- Release sites from the Green belt which are not subject to national designations. Sites with local designations should be reassessed against all the aims and objectives of the Plan, not just environmental ones
- Amend the proposed condition requiring a site start on Green Belt release sites within one year of consent to two years

## 6. Representation.

Your representation should be no more than 2000 words. You should explain clearly and concisely your reasons for seeking a change to, or supporting, this aspect of the Proposed CDP/Supporting Document. There will be no automatic opportunity to expand on your representation later in the process. Limited supporting documents will be accepted but, if you are attaching additional documents as part of Representations which simply state "see attached" or similar will not be accepted and will be returned.

The Plan starts by setting out a positive series of contextual information, challenges and aims, including planning for population and household growth, but then proceeds to identify a number of reasons for not meeting the requirements set out in the GCV Strategic Development Plan.

Page 5 states that "the Plan is consistent with the strategy of the approved Glasgow and Clyde Valley Strategic Development Plan...". However, it is clear that it does not conform to that Plan, particularly in respect of the housing requirements set out in the SDP.

Page 6 notes that The Main Issues Report identified a number of major issues including housing land supply.

Page 9 identifies two of the Strategic Outcomes of the Plan as "a vibrant place with a growing economy" and "a thriving and sustainable place to live and work".

Page 11 recognises that change in Glasgow to date has involved "an economic revival through regeneration, restructuring and reinvention of some of its communities." However, it is also recognised elsewhere that that process has been hampered by the recession, with some areas of major change either dormant or substantially slowed-down.

Page 12 notes the projected 28% rise in households in the next 25 years, driven by, amongst other things, more single-person households and longer life expectancy. A key issue is therefore identified as "accommodating the rising population and number of households".

Page 15 identifies key City Challenges, including growing population and economic growth.

Page 17 identifies the 2 Key Aims and the resultant four Strategic Outcomes for the Plan. Key words emerging from these include "vibrant", "growing", "thriving", "sustainable". Interestingly, under "vibrant" there is no mention of housing at all. Under "sustainable", there is mention of affordable housing, but also the need for a variety of types and tenures of housing, to promote choice and residential quality.

The discussion of Policy CDP3 on page 36 of the Plan explicitly links economic development with "an improved supply of good quality and sustainable housing for the City".

Policy CDP10 Meeting Housing Needs is the key housing policy, supported by the analysis in Background Paper 10 Meeting Housing Needs. The policy states that it will "aim to deliver the land supply identified in Table 4 and listed in the Policy Background Paper, in order to address housing needs in Glasgow". These are the SDP requirements. Paragraph 4.10 of the Background paper states that, "for the purposes of this paper, the targets set out in the SDP are used". However, no mention is made of the Scottish Planning Policy requirement for a "generous" land supply i.e. adding an additional flexibility to the land allocations.

The Background Paper and Plan both then set out in some detail arguments for not meeting the SDP private housing requirement. The arguments are similar to those used by a number of other Councils seeking to reduce housing land allocations below the levels suggested by approved Housing Need and Demand Assessments and/or Strategic Development Plans. Homes for Scotland has resisted all such attempts, pointing out that Scottish Planning Policy requires LDPs to conform to SDPs, and that housing requirements are derived from a HNDA and, where it exists, an SDP. They are not derived from housing completion rates or any other short-term indicator. The Reporters for SESPlan made a point of stating that development plans should not be influenced by short-term economic fluctuations when planning for the longer-term. That should apply equally to Scotland's largest city-region.

Background Paper Table 4 uses recent completions and the 2012 Audit (the last agreed Audit at the point of Plan preparation) to identify a shortfall of 6761 sites up to 2020. The assumed urban capacity potential 2020 – 2025 is almost in balance with requirement, though clearly that offers no generosity or flexibility. The paper then identifies a number of arguments as to why this shortfall need not be met, including:

- Completions have fallen well below the averages needed to meet this level of output and are unlikely to recover to pre-recession levels by 2020
- Decline in a key part of the market – flatted development
- Suppressed consumer demand
- Over-optimistic population and household projections used in the last HNDA
- Emerging trends in population and household growth which are lower
- Scope for land currently constrained or unviable to become effective again as the market improves
- Likely acceleration of progress on the three Community Growth Areas identified in City Plan 2
- Green Belt Review conclusions that little land can be released from the Green Belt without environmental damage
- Previous Green Belt releases not yet developed

On page 53 of the Plan, the Council argues that its response is "considered reasonable in the current market circumstances...". Homes for Scotland disagrees that this Plan represents a reasonable response to housing need and demand.

The Plan fails to take account of:

The Plan fails to take account of:

- The vision and aims of the Plan to stimulate growth
- The acknowledged need for range, choice and variety of housing sites
- The over-reliance on brownfield land
- The market reasons for failure or delay in regeneration areas and CGA's

Paragraph 4.35 perpetuates a false argument used by many Councils, that if land previously allocated for development is constrained and unable to come forward quickly, then allocating new sites would also fail as they could not come forward quickly either – failing entirely to recognise that new sites would be subject to Missives and terms reflecting current values and market potential.

The arguments propounded suggest that the Council does not fully understand the housing market in Glasgow, in particular it does not understand that in order to increase rates of housebuilding it would have to release marketable land in the right locations where people want to live, especially those who might be attracted to the city to boost economic activity and growth. Relying on the existing established supply to become effective again is not based on any clear analysis of why that might happen. By contrast, the Council itself acknowledges that, for instance, two of its regeneration areas are inactive, and progress on others has slowed dramatically, and of the three Community Growth Areas one is acknowledged in 4.18 to require a *“further feasibility study to establish the extent of the development opportunity within this part of the city”*.

Analysis of the land supply in the agreed 2012 Housing Audit reveals the extent of the weakness of Glasgow's housing land supply, and points to the need for something different to stimulate housing growth (An annex paper is attached). Of the effective supply 2012 – 2019, 42% is in the category “Residential Potential” i.e. sites with no consents and hence no certainty that they will actually come forward. Experience across Scotland shows that there will undoubtedly be a “failure rate” amongst these sites. In the later years of the effective period, the reliance on this category of sites rises to 50%.

Of the effective supply to 2019, 38% has no known builder or developer, whether private sector or Housing Association/other public sector. That proportion rises to nearer 60% for the established supply beyond 2019. That represents a very substantial uncertainty about the potential for these sites to progress where there is no obvious development interest in them.

Inevitably in a large city, there will be a large element of flatted development in the land supply. The proportion of sites which are intended for flats is 49% of the effective supply, and 61% of the constrained supply. The downturn in completions of flatted development has been very marked in Glasgow, and the prospects for that part of the market to recover are uncertain. The flatted land supply is also heavily-

concentrated in 4 or 5 community areas. That is another aspect of land supply which suggests the need for alternative approaches to increasing housebuilding.

If flatted developments are widely constrained, and if many of them have no obvious developer interest behind them then it follows that, to make these sites viable and marketable may need a reconsideration of the type of development on them. In practice, that would mean re-mixing house types, densities and so on with a significant impact on capacities and output. That would of course increase the shortfall in land supply against requirement.

Homes for Scotland does not agree with the statement in Background Paper 10 paragraph 4.16 that the *“recovery is also likely to be largely dependent on renewed activity in the flatted market.”* While Help to Buy and other initiatives have helped first-time buyers to re-enter the market, the bulk of developers’ sales are coming from detached, semi-detached and terraced houses. It is those types of housing that are needed to increase the diversity, range and choice of housing in Glasgow and to attract a wider range of people back to the city.

Releasing more land suitable for non-flatted development is therefore an obvious approach. However, the Background Paper paragraph 4.35 dismisses this option:

*“Identification of a private sector land supply sufficient to meet the SDP requirements would necessitate significant development in the Green Belt, and would have unacceptable environmental consequences for the City. It was also considered that there is insufficient demand in the short term for this level of house building, and that the land would not have come forward within the SDP timescale.”*

It is clear in the Green Belt Review (Background Papers 6 and 13) that the review was not carried out to inform a balanced decision-making process evaluating the pros and cons of Green belt release. On page 43 the Plan states that there is *“little scope for any further contraction of Glasgow’s Green Belt if it is to continue to meet environmental objectives”*. That may be so, but economic and social objectives have not been weighed against the environmental ones, resulting in a failure to deliver on the wider aims and outcomes of the Plan relating to housing growth. While there are parts of the Green Belt subject to important national and local designations which probably should not be released, equally there are many areas not subject to such designations where a balanced assessment of conflicting objectives and outcomes has not been presented.

It is simply untrue to state that there is a lack of demand for the housing of the types which could be built on this land. Such housing is being delayed in CGAs and masterplan areas by the Council’s laborious and onerous planning processes, not by a lack of demand.

This partial approach results in a proposal to release 3 small sites from the Green Belt, with a combined capacity of less than 130 houses. This is clearly a wholly-

inadequate response to the shortfall, to providing greater range and choice, to meeting a range of housing needs and to achieving the broader vision and aims of the Plan.

A footnote to the table in the Policy setting out these sites contains the suggestion that planning permission on these sites will include a condition requiring development to commence within one year of grant of consent. Can Glasgow Council ensure that all other consent processes can be completed within a year of approval? Even once all consents are in place, a builder would need a certain mobilisation period before starting on site. One year is entirely unrealistic. The proposal to remove the site after 5 years of inactivity following adoption of the Plan may have more merit.



HOMES FOR SCOTLAND GLASGOW LDP REPRESENTATION - SUPPORTING DOCUMENT 1

BACKGROUND LAND ANALYSIS

Private Effective Supply Components

|                | 2012/13 | 13/14 | 14/15 | 15/16 | 16/17 | 17/18 | 18/19 | Effective |
|----------------|---------|-------|-------|-------|-------|-------|-------|-----------|
| U Construction | 880     | 750   | 667   | 501   | 470   | 401   | 205   | 3874      |
| Consents       | 52      | 481   | 626   | 814   | 817   | 742   | 558   | 4090      |
| Res Potential  | 3       | 0     | 925   | 1136  | 1345  | 1102  | 845   | 5925      |
| Greenfield     | 0       | 0     | 15    | 2     | 70    | 70    | 70    | 335       |
|                | 935     | 1815  | 2268  | 2511  | 2702  | 2315  | 1678  | 14224     |

Builder/developer

|                    | Effective | Post 19 |
|--------------------|-----------|---------|
| U Construction     | 3874      | 182     |
| Consents           | 4090      | 9088    |
| Known housebuilder | 1516      | 1944    |
| Other developer    | 406       | 1218    |
| HA/GCC/Co-op etc   | 603       | 978     |
| Unknown            | 1555      | 4948    |
| Res Potential      | 5925      | 13109   |
| Known housebuilder | 2563      | 2768    |
| Other developer    | 267       | 1623    |
| HA/GCC/Co-op etc   | 595       | 545     |
| Unknown            | 2500      | 8173    |
| Greenfield         | 335       | 291     |

Historic Mainstream Flatted Completions (excludes Shared Equity)

|                      | 2002/03 | 2003/04 | 2004/05 | 2005/06 | 2006/07 | 2007/08 | 2008/09 | 2009/10 | 2010/11 | 2011/12 |
|----------------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|---------|
| Flatted (number)     | 1433    | 2006    | 1666    | 2087    | 2207    | 2180    | 1293    | 1003    | 733     | 556     |
| % of all completions | 61%     | 79%     | 80%     | 75%     | 70%     | 67%     | 74%     | 73%     | 68%     | 58%     |

2012 Effective Private Mainstream Supply by House Type

|                      | Flats | Houses | Total | % Flats |
|----------------------|-------|--------|-------|---------|
| Established Supply   | 20064 | 15597  | 35661 | 56%     |
| Effective Supply     | 6484  | 6854   | 13338 | 48%     |
| Non-effective supply | 13580 | 8743   | 22323 | 61%     |

Around 90% of the flatted supply is concentrated in 5 of the City's Community Planning Partnership areas:

- Central and West
- East Centre and Caltoun
- Govan and Craighton
- Pollockshields/Southside Central
- Maryhill/Kelvin and Canal



|                      |
|----------------------|
| Comm No:             |
| Rep No:              |
| For Council Use Only |

## PROPOSED LOCAL DEVELOPMENT PLAN FOR GLASGOW (THE CITY DEVELOPMENT PLAN)(CDP)

### REPRESENTATION FORM

The Proposed CDP is now available for representations to be made. We would like your views on any of the issues, policies or development proposals set out in the CDP or in the supporting documents, including the Strategic Environmental Assessment Revised Interim Environmental Report. This form should be used for all representations – the Council will only accept representations made using this form.

Completed forms must be received by **4pm on Friday 27 June 2014** using one of the following methods:  
(Forms recieved after this date will not be accepted)

Post: Development Plan Team  
Development and Regeneration Services  
Glasgow City Council  
231 George Street  
Glasgow, G1 1RX

On-line: electronic forms can be completed and automatically submitted at: [www.glasgow.gov.uk/developmentplan](http://www.glasgow.gov.uk/developmentplan)

Email: forms can be downloaded, completed and sent to [developmentplan@glasgow.gov.uk](mailto:developmentplan@glasgow.gov.uk)

If you are unsure of how to complete this form, further advice can be found on our website ([www.glasgow.gov.uk/developmentplan](http://www.glasgow.gov.uk/developmentplan)) or can be obtained by emailing [developmentplan@glasgow.gov.uk](mailto:developmentplan@glasgow.gov.uk) or by phoning 0141 287 8608.

PLEASE USE A SEPARATE FORM FOR EACH INDIVIDUAL REPRESENTATION – i.e. each aspect of the Proposed CDP or supporting document you wish to comment on.

#### 1. Please provide us with your contact details.

Please provide names and contact details for yourself, the company, group, individual or organisation that you represent. Please note that representations cannot be treated confidentially and will be scanned and made available for public inspection, including online, except any information which would be subject to the Data Protection Act 1998. They may also be passed to the Scottish Government's Directorate for Planning and Environmental Appeals in order that they can involve you in any Examination of the Plan.

Only representations that include a name and a method of contact (by email or post) will be validated.

Name:

Organisation Name:   
(if applicable)

Address:

Telephone:

Email:

Please check box if you do not wish to be contacted by email:

[contacting you by email helps us reduce costs and improve efficiency - we will contact you by email unless specifically asked not to]

Agent's Name:

(If you provide an Agent's name the Council will direct all subsequent correspondence to your Agent)

Agent's Address:

Telephone:

Email:

**2. Please indicate which document you are making a representation/comment on.**

Proposed City Development Plan  Habitats Regulations Appraisal

SEA Revised Interim Environmental Report  Other (please specify)

Please note that only representations on the Proposed City Development Plan will be considered at the LDP Examination. Comments on other documents will be considered by the Council and, where relevant to the consideration of unresolved representations on the Proposed CDP, may also be taken into account by the Reporter at the CDP Examination. See Guidance Note for further information.

**3. Please tell us which part of the above document you are making a representation on.**  
**Fill in all that apply:**

Page Number

Proposal Number

Policy Number

Other

**4. Please tell us if your representation is in support of the document or whether you would wish to see it changed (i.e. your representation is an objection).**

Support

Please complete sections 6 below

Seek a change (objection)

Please complete section 5 and 6 below

**5. Please indicate what changes you would like made to the Proposed Plan.**

The policy should include a statement along the lines of:  
"Developer contributions, where required, will be sought through planning conditions or, where this is not feasible, planning or other legal agreements, when the tests of Circular 3/2012 are met. Contributions may be reduced or waived where a developer can demonstrate that there are abnormal development costs or overall viability issues which render the contribution impractical."  
The policy should state that assessments of infrastructure/facilities deficiencies will be carried out either by the developer or jointly with the Council and/or other agencies.  
There should be a reference in the Policy to further detail on facilities and infrastructure being available in the Action Plan.

## 6. Representation.

Your representation should be no more than 2000 words. You should explain clearly and concisely your reasons for seeking a change to, or supporting, this aspect of the Proposed CDP/Supporting Document. There will be no automatic opportunity to expand on your representation later in the process. Limited supporting documents will be accepted but, if you are attaching additional documents as part of Representations which simply state "see attached" or similar will not be accepted and will be returned.

This policy is inadequate in terms of giving developers clarity as to what may be expected of them. In terms of policy and procedure, the policy should be clear about the need for any contributions to meet the five tests of Circular 3/2012. It should be clear about the mechanisms for securing contributions – preferably planning conditions in line with the Circular. It should also set out any circumstances where contributions may be waived or reduced – for instance, project viability or abnormal development costs.

Policy CDP6 is deficient in that it does not set out the basis on which open space provision is to be assessed. It is also unreasonable that the Plan gives no detail as to what type(s) of community facilities might be needed. The Council is surely in the best place to know about education provision issues, public facilities such as sports, community centres, libraries and so on. Development Plans should contain an Action Plan which should set out what is required to deliver the Plan. That Action Plan should identify facilities to be provided and the providers/funders. To leave all of that detail to developers is inappropriate.