

Patrick Kelly
Head of Planning and Development
Dalziel Building
7 Scott Street
Motherwell
ML1 1SX



26 November 2009

Dear Mr Kelly,

Re: NORTH LANARKSHIRE COMMUNITY GROWTH AREAS – CONCEPT STATEMENT CONSULTATION

Scottish Wildlife Trust (SWT)¹ welcomes the opportunity to comment on North Lanarkshire (NL) Community Growth Areas (CGAs).

SWT believe that inappropriately located and badly designed developments can have significant, detrimental impacts on Scotland's biodiversity and on people's quality of life too. Conversely, SWT appreciates the need for North Lanarkshire Council to provide new housing and infrastructure and is supportive of new development where this is delivered in line with sustainable development principles and practice, and where it does not adversely impact on important habitats and species. We believe that the planning and design of new places could and should in the future *enhance* biodiversity, particularly if new developments are designed to improve habitat connectivity and avoid the destruction of valuable biodiversity hotspots (e.g. Local Nature Conservation Sites). To achieve this SWT recommends the application of an ecosystem-based approach² to at least the natural heritage aspects of the planning system.

After reading the CGA concept statements, SWT are broadly supportive of NL council's vision, guiding principles and specific requirements for each CGA (*but please see our specific comments below*). **We believe effective delivery of the vision can only be achieved through high quality Masterplanning.** As such, the Masterplanning process must adhere to the principles of Planning Advice Note 83 and engage, **from the outset**, with all relevant stakeholders, including the local community and SWT.

SOUTH CUMBERNAULD COMMUNITY GROWTH AREA

Key Message

Because SWT own wildlife reserves adjacent to the proposed South Cumbernauld CGA and, as we are developing a Cumbernauld Living Landscape Programme, SWT would like to engage with NLC from the outset. We believe synergies exist in what we want to achieve for both wildlife and people and NL Council's aspiration for the South Cumbernauld CGA.

SWT believe the opportunity exists to work together with NLC to deliver a sustainable, high quality community growth area that benefits the people of Cumbernauld and its wildlife. This coordinated effort will also add value to our own neighbouring wildlife reserves.

¹ The Scottish Wildlife Trust's central aim is to advance the conservation of Scotland's biodiversity for the benefit of present and future generations. With over 35,000 members, several hundred of whom are actively involved in conservation activities locally, we are proud to say we are now the largest voluntary body working for all the wildlife of Scotland. The Trust owns or manages 123 wildlife reserves and campaigns at local and national levels to ensure wildlife is protected and enhanced for future generations to enjoy.

² See Hughes J., Brooks S. (2009) Living Landscapes: towards ecosystems-based conservation in Scotland. Scottish Wildlife Trust, Edinburgh

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Specific points

Page 1

1 PURPOSE OF THE CONCEPT STATEMENT

First paragraph - As we believe a high quality Masterplan will be essential for the successful delivery of NL Council's *vision*, we welcome the *requirement* of the production of a Masterplan. As such, we urge NL Council to adhere to the principles of Masterplanning as stated in Planning Advice Note 83 and we would encourage NL Council to ensure there is engagement with stakeholders from the **outset** of the Masterplanning process.

Because SWT own wildlife reserves adjacent to the proposed CGA and, as we are developing a Living Landscape project in Cumbernauld, we see synergies between what we want to achieve and NL Council's *vision* for the CGA which states, *inter alia*, that the CGA should: *Be designed and built to a high quality, and integrate well with the existing communities and the local environment.*

SWT believe the opportunity exists to work together with NLC to deliver a sustainable high quality community growth area that benefits the people of Cumbernauld, its wildlife and adds value to our own wildlife reserves.

Before the Masterplan is approved by NL Council, we recommend that it is reviewed through the Design Review Process provided by Architecture and Design Scotland³

We also encourage NL Council to explore the possibility of working with the Prince's Foundation for the Built Environment. The Projects and Practice Department⁴ is the consultancy arm of The Foundation, which operates as a social enterprise by engaging in fee earning urban design and master planning projects. The Foundation has recently produced a Masterplan for South Ayrshire Council re: the creation of a new neighbourhood in Cumnock, called Knockroon⁵.

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3 SOUTH CUMBERNAULD GROWTH AREA

First paragraph - NLC should recognise SWT wildlife reserves: Forest Wood and Luggiebank Wood.

The last sentence should state: The area is separated from the existing urban area by a local distributor road, Forest Road-Lenziemill Road, and by the Glasgow-Falkirk railway line and by SWT Cumbernauld Glen Wildlife Reserve. It should also state that: The site is also bordered to the east and west by Forest Wood and Luggiebank SWT wildlife reserves respectively.

Second paragraph - to insert: The areas are physically separated by a wooded valley, part of which is a SWT wildlife reserve, and a distance of about 700 m.

Fourth paragraph - suggested word change: Mid Forest is situated on a north facing slope to the south of Forest Road. At Mid Forest, topography ranges from gently sloping land near the existing woodland, around the edge of Cumbernauld, to fairly level ground in higher parts of the area.

Fifth paragraph - to insert: the proposed 2000 dwellings and associated amenities.

Sixth paragraph – a comment on the map: The boundary of the proposed CGA requires more detailed clarification.

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4 THE VISION

³ See: <http://www.ads.org.uk/about>

⁴ See: <http://www.princes-foundation.org/index.php?id=13>

⁵ See: <http://www.princes-foundation.org/index.php?id=300>

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Third bullet point – suggested word change: Be sustainable, both environmentally and socially, in terms of *protecting, enhancing and expanding* environmental assets....

5 THE GUIDING PRICIPLES

First bullet point – Creation of a 'distinct identity and sense of place' - opportunity here to refer to Scottish Government's National Outcomes 10: *We live in well-designed, sustainable places where we are able to access the amenities and services we need.*

Second bullet point - suggested word change: The design strategy will take reference from successful *national and international sustainable urban communities*. For example see:

Poundbury, England⁶

Craigmillar Park, Scotland⁷

Vauban, Germany⁸

Hammarby, Sweden⁹

Last sentence in bullet point two states that: *Masterplans will be the subject of further consultation with the local communities before they are submitted to the planning authority.*

We would suggest that the local community must not be presented with a fait accompli - but should be involved from the outset of the masterplanning process.

Pan 83 states: *When creating successful places people must be at the heart of the process. The local community's understanding of the needs of an area are invaluable in establishing priorities and arriving at a vision for a place.*

We would also restate the importance of obtaining a review of the Masterplan by Architecture and Design Scotland.

Third bullet point – suggest changing *good* quality design to *high* quality design; last part of sentence – replace the *fear of crime* with *antisocial behaviour*. It should also be stated that high quality design and green space is also beneficial in terms of people's well being and physical health¹⁰. Other benefits of having quality green infrastructure¹¹:

- more attractive towns and cities foster inward investment
- reduction in atmospheric pollution
- carbon capture
- filtering of atmospheric pollutants
- amelioration of flash flooding (and less soil sealing)
- increased community pride in local neighbourhoods
- conservation of biodiversity

Fourth bullet point – it is important to recognise that SWT's wildlife reserves, which border the proposed CGA, are part of the community. As such these high quality woodlands/greenspaces, in addition to being beneficial for wildlife, perform a recreational function for the local community.

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First bullet point –suggested insertion: The development should contain substantial areas of *high quality* open space.... There should be a clear definition of what constitutes open space - see SPP 11 or consolidated SPP due for publication at the end of this year.

⁶ <http://www.princes-foundation.org/index.php?id=176>

⁷ http://download.edinburgh.gov.uk/Development_Framework/CraigmillarUrbanDesignFramework.pdf

⁸ <http://www.urbandesigncompendium.co.uk/vauban?ThumbnailID=3#largeimagesection>

⁹ <http://www.urbandesigncompendium.co.uk/hammarby%20sjöstad>

¹⁰ De Vries, S (2001). Nature and health; the importance of green space in the urban living environment. Proceedings of the symposium 'Open space functions under urban pressure'. Ghent: 19–21 September

¹¹ Green infrastructure is a term that encompasses features such as green networks, parks, gardens, allotments, rivers and canals, SUDS, green roofs, urban forestry and microhabitats

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It should be stated that tools exist to aid in the design of the green network (e.g. the integrated habitat network model, BEETLE, produced by Forest Research). Also, that the green network would contribute to National Development 12: the Central Scotland Green Network. Liaison with SWT and Glasgow and Clyde Valley Green Network (GCVGN) is essential to ensure that the network of high quality green space is of the **right type, ecologically functional, and is beneficial to both wildlife and people.**

The green network should extend from existing woodlands surrounding the proposed CGA through and around the new housing and amenity facilities. The 'green corridors' could be a combination of native woodland and shrubs, hedges or species rich grassland. They have the added benefit over amenity grassland, of requiring low maintenance, have a higher biodiversity value and are aesthetically more pleasing.

It should also state that if woodland and hedgerows are removed – there should be compensatory planting of native species elsewhere (e.g. as part of green network).
Public art could also be incorporated as part of the green space.

There is also the issue of who **maintains** the green infrastructure- will this be through developers' contributions or fall on the Council.

Second bullet point – New residential layout should be designed using a 'grid system' (e.g. a fully permeable interconnected street network) rather than 'dead-end' cul-de-sacs. Such designs encourage people to walk. To promote safe driving, residential areas should have 'shared space' or local streets where, through careful design, priority is given to walking, cycling or public transport over general traffic needs⁷.

Third bullet point – rather than expecting developers to create *compensatory* sports facilities, new recreational facilities should be incorporated into the development design. E.g. mountain bike/cycling trails, play parks, skate parks. The decision regarding what is required and where, should rest with the local community and be part of the masterplanning process.

Fourth bullet point – green roofs should be considered as an example of improving energy efficiency. Other benefits of green roofs are: improved views, attracting wildlife and decreasing rainwater run-off during storm events.

SUDS should be designed to enhance biodiversity and increase the attractiveness of the settlement. They may be located to form part of the 'buffer zone' habitat (consult with SWT). They should form part of the green network and be included in the Masterplan to ensure their capacity meets the requirements of **all phases** of the built environment.

Fifth bullet point – suggested insertion: Infrastructure *and the provision of green networks* required as a consequence

We note there is no mention of underground water and gas services. There is an opportunity here to incorporate green network (e.g. scrub, species rich grassland) above the route of the underground pipes.

Sixth bullet point – suggested insertion: When approved, the development will proceed in accordance with the agreed phasing *and take account of the findings of ecological surveys.*

General point - The guiding principles section should also include a section on gardens, community allotments and community orchards. Allotments could be set up and used by the local community **before** all phases of the development are completed.

It should state which guiding principles relate to inside and/or outside the CGA boundary.

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6 SPECIFIC REQUIREMENTS

Landscape and nature conservation

First bullet point - It states: *Developers should identify wildlife and natural heritage interests* – SWT recommends that they are guided by: NLC's Biodiversity Action Plans, NLC's Woodland Strategy and SWT's Woodland Policy.

Natural assets – should be defined.

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We recommend that developers **avoid** SINCS¹² They should be identified, protected and incorporated into the Masterplan.

Second bullet point – buffer distances: these should be defined in the guidance and **not led by developers**. We recommend the following text at least: Developers will be required to *fund and* provide sufficient buffer distances. Specification should be worked out in conjunction with SEPA, SNH, FCS and SWT (for buffer zones around our reserves).

SWT nature reserves, Forest Wood and Luggiebank Wood, should be identified and mapped.

Suggested insertion: Developers will also be required to provide a strong landscape framework (this requires definition) to strengthen and protect and *positively integrate core* habitat areas.

We believe an EIA **is essential** prior to the development of the Masterplan, otherwise the environmental resource will be an unknown quantity in the Masterplan. We would also recommend a monitoring programme to monitor the impacts post construction. Due to the sensitivity of the works close to SWT's wildlife reserves we also suggest the requirement of an Ecological Clerk of Works ensures that best practice construction is delivered on the ground.

Third bullet point - suggested inclusion: If any of the recently planted woodland is lost to development there should be compensatory planting as part of the functional and high quality green network. We are unsure what a *structural landscape framework* is. This requires clarification.

Fourth bullet point – As compensatory habitat may be required to account for the loss because of the CGA we suggest the impacts of the development are monitored post construction.

Fifth bullet point – It should be noted that there is the opportunity for native tree or shrub planting (with appropriate buffer distances from the nearest development) to act as screening and soften impact (e.g. planting on prominent and sloping sites).

Sixth bullet point – suggested replacement (third sentence): Existing *woodland* planting This section should also refer to retention of native species and the protection and enhancement of remnants of ancient woodland (if present). As part of this, any tree planting and integration with the landscape should be considered in the context of the enhancement of the green network (**confer with SWT and GCVGN to ensure appropriate rather than piecemeal tree planting**).

Eighth bullet point – text missing from end of paragraph.

General point -under specific requirements: We recommend that there is a monitoring programme put in place (during and especially post-construction) to determine the impact of the development on wildlife and people's quality of life (suggest potential to work with SWT and possible Greenspace Scotland).

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Affordable housing

Is there a definition of affordable housing – essential that this includes council rented properties. Otherwise affordable houses are likely to increase in value because of the high quality environment. This will then prevent some of the local community being able to afford to live in the area.

Access and Movement

First bullet point - we recommend that NLC refer to SWT's Access Network Development Plan. It should be recognised that 'new route' infrastructure should form part of the green network as a linear habitat feature.

Fifth bullet point – The existing underpasses are not used by the local community because they are considered unsafe. We would urge the consideration of green bridges (which can be used by people and wildlife) or pedestrian crossings.

¹² In the new SPP SINCS are termed Local Nature Conservation Sites (LNCSs)

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Seventh bullet point – pedestrian and cycling routes should also link to **all community facilities and local amenities** including SWT's wildlife reserves. There is also the opportunity for people to utilise links through SWT's reserves (need to consult with SWT here).

Eight bullet point – suggested word change: The level of existing and the provision of new public transport *must* be considered as part of the masterplanning process.

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Community Facilities and Services

First bullet point – suggested inclusion: Developers will be required to contribute towards educational and *environmental* provision within the Community Growth Area.

Educational opportunities exist here to in conjunction with Forest Schools, environmental education e.g. Ranger led activities linked to enhanced green network and SWT reserves.

Second bullet point – it is important to state that **SWT wildlife reserves are recognised as part of the community facilities.**

Third bullet point - We would advocate that recreational facilities (e.g. playing fields) are located within walkable distance within the CGA. As such, they should be connected to dwellings by suitable paths and cycle ways. This could form part of the green network. What should be avoided is children relying on the car to access physical activity.

Fifth bullet point – Local shopping facilities should be located within 5 minutes walking distance (i.e. the 5 minute pint rule) of new residential areas. This should encourage inhabitants to leave the car at home and will increase the sense of community through provision of local shops.

Utilities

First bullet point – suggested insertion: Stand-off distances will be required from *both* the pylon lines and *water and gas pipes* crossing the area to....*Through careful design these wayleaves can be incorporated into the green network and provide linear movement for wildlife.*

Ground Conditions and Air Quality

Second bullet point-insertion required: Potential *hydrological*, noise and vibration impacts....It should also be added that impacts to wildlife must be assessed and significant impacts avoided or diminished through mitigation.

Additional Information

Luggiebank Quarry Site – SWT is currently working with the developer of this site, which is adjacent to the western end of the Cumbernauld Growth Area. As the site is brown field, we would like to see it developed for high quality energy efficient housing in accordance with current Scottish Government guidance. We recommend that Luggiebank Quarry is included as part of the CGA

SOUTH WISHAW COMMUNITY GROWTH AREA

Specific points

Page 1

1 PURPOSE OF THE CONCEPT STATEMENT

First paragraph - As we believe a high quality Masterplan will be essential for the successful delivery of NL Council's *vision*, we welcome the *requirement* of the production of a Masterplan. As such, we urge NL Council to adhere to the principles of masterplanning as stated in Planning Advice Note 83 and we would encourage NL Council to ensure there is engagement with stakeholders¹³ from the **outset** of the masterplanning process.

¹³ E.g. local community groups such as Overtown and Waterloo Community Forum

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Before the Masterplan is approved by NL Council, we recommend that it is reviewed through the Design Review Process provided by Architecture and Design Scotland¹⁴

We also encourage NL Council to explore the possibility of working with the Prince's Foundation for the Built Environment. The Projects and Practice Department¹⁵ is the consultancy arm of The Foundation, which operates as a social enterprise by engaging in fee earning urban design and master planning projects. The Foundation has recently produced a Masterplan for South Ayrshire Council re: the creation of a new neighbourhood in Cumnock, called Knockroon¹⁶.

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3 SOUTH WISHAW GROWTH AREA

First paragraph – When setting the location of the CGA it should state that the Garrion Gill forms part of the Clyde Valley Woods National Nature Reserve (designated as an SAC and SSSI) and also contains Garrion Gill SWT wildlife reserve.

Page 3

4 THE VISION

Third bullet point – *suggested word change:* Be sustainable, both environmentally and socially, in terms of *protecting, enhancing and expanding* environmental assets....

5 THE GUIDING PRINCIPLES

Bullet points 1, 2, 3 - Please refer to SWT's comments on page 3 above (first, second and third bullet point - under Guiding Principles) which are also applicable here.

Fourth bullet point – it is important to recognise that the SWT's Garrion Gill Wildlife Reserve, which forms part of the Clyde Valley Woods National Nature Reserve and is adjacent to the proposed CGA, is protected, due to its benefits to wildlife but also as a recreational resource.

Page 4

First bullet point - Please refer to SWT's comments under first bullet point on page 3-4 (last paragraph of page 3) of this report, which are also applicable here.

Second bullet point - Please refer to SWT's comments under third bullet point on page 4 of this report, which are also applicable here.

Third bullet point - Please refer to SWT's comments, under second bullet point on page 4 of this report, which are also applicable here.

Fourth bullet point - Please refer to SWT's comments, under fourth bullet point on page 4 of this report, which are also applicable here.

Fifth bullet point - Please refer to SWT's comments, under fifth bullet point on page 4 of this report, which are also applicable here.

Sixth bullet point – Please refer to SWT's comments, under sixth bullet point on page 4 of this report, which are also applicable here.

General point - The guiding principles section should also include a section on gardens, community allotments and community orchards. Allotments could be set up and used by the local community **before** all phases of the development are completed.

¹⁴ See: <http://www.ads.org.uk/about>

¹⁵ See: <http://www.princes-foundation.org/index.php?id=13>

¹⁶ See: <http://www.princes-foundation.org/index.php?id=300>

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It should state which guiding principals relate to inside and/or outside the CGA boundary.

Page 5

6 SPECIFIC REQUIREMENTS

Landscape and nature conservation

First bullet point: Mention of *overall landscape framework*- could this be defined please.

Third bullet point – states that *existing hedgerows in the northern part of site should be reinforced where practical*. Not entirely sure what this means. Should it be inferred from this that there will be additional planting of native tree and shrub species to shore up gaps in hedgerow and make them more species rich?

Fourth bullet point- Again *landscape framework* needs definition. It should be stated that where trees are lost to development, there should be compensatory planting with native species. All tree removal and new planting should be carefully planned to enhance the current and future green network - use of integrated habitat network model such as BEETLE is essential. Masterplanning process should take this into account and incorporate trees into the design layout. Suitable buffer zones protecting new build from established trees must be considered.

Sixth bullet point – Second sentence should state that Environmental Impact Assessment *will* be required. Opportunities for creating links - refer to the green network. Ensure this is done in a coordinated manner using tools such as the integrated habitat network model. Clyde Valley Woods should be given its designation (National Nature Reserve, SAC, SSSI) to emphasise its importance. It should also state that Garrion Gill is an ancient woodland of semi-natural origin.

Green networks should be thought of as connecting people with nature in the CGA and providing a permeable landscape for wildlife to move. Linear green features may also form part of a sustainable transport strategy such as walkways and cycle paths. This should all be bottomed out in masterplanning. Consultation at an early stage with stakeholders such as Glasgow and Clyde Valley Green Network, Forestry Commission Scotland, SWT, SNH, SEPA should ensure that the proposed development has the right kind of green infrastructure.

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Utilities

Please refer to SWT's comments, under first bullet point (under Utilities) on page 6 of this report, which are also applicable here.

Community Facilities and Services

First bullet point - *Please refer to SWT's comments, under Community Facilities first bullet point on page 6 of this report, which are also applicable here.*

Page 7

First bullet point - Local shopping facilities should be located within 5 minutes walking distance (i.e. the 5 minute pint rule) of new residential areas. This should encourage inhabitants to leave the car at home and will increase the sense of community if there is provision of local shops.

Second bullet point – It should be stated under this section that the Clyde Valley Woods National Nature Reserve is a community facility.

Third bullet point - Access to each CGA be it, housing, recreational amenities, local shops should facilitate walking and cycling NOT car usage. Therefore connections between each part of the CGA will have to be incorporated at the masterplanning stage.

Forth bullet point - *Please refer to SWT's comments, under third bullet point of page 6 of this report, which are also applicable here.*

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Access and Movement

First bullet point - Please refer to SWT's comments, first bullet point (under Access and Movement) on page 5 of this report, which are also applicable here.

Fourth bullet point – Developers should also be expected to contribute to improving the cycling and walkways network.

GARTCOSH:GLENBOIG COMMUNITY GROWTH AREA

Specific points

Page 1

1 PURPOSE OF THE CONCEPT STATEMENT

First paragraph - As we believe a high quality Masterplan will be essential for the successful delivery of NL Council's *vision*, we welcome the *requirement* of the production of a Masterplan. As such, we urge NL Council to adhere to the principles of Masterplanning as stated in Planning Advice Note 83 and we would encourage NL Council to ensure there is engagement with stakeholders from the **outset** of the Masterplanning process.

Before the Masterplan is approved by NL Council, we recommend that it is reviewed through the Design Review Process provided by Architecture and Design Scotland¹⁷

We also encourage NL Council to explore the possibility of working with the Prince's Foundation for the Built Environment. The Projects and Practice Department¹⁸ is the consultancy arm of The Foundation, which operates as a social enterprise by engaging in fee earning urban design and master planning projects. The Foundation has recently produced a Masterplan for South Ayrshire Council re: the creation of a new neighbourhood in Cumnock, called Knockroon¹⁹.

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GARTCOSH:GLENBOIG GROWTH AREA

First Paragraph - When setting the location of the CGA, Bishop Loch SSSI and Woodend Loch SSSI, both of which are within 1.4 km of the site boundary, and are linked hydrologically to Johnston Loch, should be included – to give an environmental context.

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4 THE VISION

Third bullet point – ***suggested word change***: Be sustainable, both environmentally and socially, in terms of *protecting, enhancing and expanding* environmental assets....

5 THE GUIDING PRINCIPLES

Bullet points 1, 2, 3 - Please refer to SWT's comments on page 3 above (first second and third bullet point under Guiding Principles) which are also applicable here.

Page 4

First bullet point - Please refer to SWT's comments under first bullet point on page 3-4 (last paragraph on page 3) of this report, which are also applicable here.

¹⁷ See: <http://www.ads.org.uk/about>

¹⁸ See: <http://www.princes-foundation.org/index.php?id=13>

¹⁹ See: <http://www.princes-foundation.org/index.php?id=300>

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Second bullet point - Please refer to SWT's comments under third bullet point on page 4 of this report, which are also applicable here.

Third bullet point - Please refer to SWT's comments, under second bullet point on page 4 of this report, which are also applicable here.

Fourth bullet point - Please refer to SWT's comments, under fourth bullet point on page 4 of this report, which are also applicable here.

Fifth bullet point - Please refer to SWT's comments, under fifth bullet point on page 4 of this report, which are also applicable here.

Sixth bullet point – Please refer to SWT's comments, under sixth bullet point on page 4 of this report, which are also applicable here.

General point - The guiding principles section should also include a section on gardens, community allotments and community orchards. Allotments could be set up and used by the local community **before** all phases of the development are completed.

It should state which guiding principals relate to inside and/or outside the CGA boundary.

Page 5

6 SPECIFIC REQUIREMENTS

Landscape and Nature Conservation

First bullet point - Please refer to SWT's comments, under fifth bullet point (under Landscape and Nature Conservation) on page 5 of this report, which are also applicable here.

Second bullet point – Require definition of structural planting – does it have any biodiversity value and does it contribute to the green network or high quality green infrastructure? Hedges should be retained and enhanced with native species. Where this is not possible, compensatory high quality hedgerow planting should be considered. It states that mature trees should be protected - are there any existing tree preservation orders in place. Compensatory native tree planting should be carried out where trees have been removed.

All tree removal and new planting should be carefully planned to enhance the current and future green network-use of integrated habitat network model such as BEETLE is essential. The masterplanning process should take this into account and incorporate trees into the design layout. Suitable buffer zones protecting new build from established trees must be considered.

Fourth bullet point - Please refer to SWT's comments, under first bullet point (last paragraph) on page 4 of this report, which are also applicable here.

Fifth bullet point – buffer distances – these should be defined in the guidance and **not be led by developers**. We recommend the following text at least: Developers will be required to fund and provide sufficient buffer distances. Specification should be worked out in conjunction with SEPA, SNH, FCS. SWT can also offer advice as required.

Suggested insertion: Developers will also be required to provide a strong landscape framework (this requires definition) to strengthen and protect and positively integrate core habitat areas.

We believe an EIA **is essential** prior to the development of the Masterplan, otherwise the environmental resource will be an unknown quantity in the Masterplan. We would also recommend a monitoring programme to monitor the impacts post construction – especially in relation to the hydrologically connected Lochs. We also recommend that 'boggy areas' are avoided because drainage will be required.

Sixth bullet point – Third sentence pertains to a *large set back area* – appropriate distances should be defined (according to environmental constraints) prior to Masterplanning, so as not to become developer-led. Specification of set back should be worked out in conjunction with the appropriate statutory agencies such as SEPA and SNH. SWT can also offer advice as required.

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Development adjacent to Johnston Loch should provide an opportunity to provide linear green corridors, which would allow wildlife a permeable landscape over which to move.

General point – This section has not mentioned provision of high quality green infrastructure which can form part of the green network. Indeed, green networks have not been mentioned at all. High quality green space benefits wildlife and adds value in terms of people's well being and physical health²⁰. Other benefits of having high quality green infrastructure²¹:

- more attractive towns and cities foster inward investment
- reduction in atmospheric pollution
- carbon capture
- filtering of atmospheric pollutants
- amelioration of flash flooding (and less soil sealing)
- increased community pride in local neighbourhoods
- conservation of biodiversity

It should be stated that tools exist to aid in the design of the green network (e.g. the integrated habitat network model, BEETLE, produced by Forest Research). Also, that the green network would contribute to National Development 12: the Central Scotland Green Network. Liaison with FCS, Glasgow and Clyde Valley Green Network (GCVGN) and potentially SWT is essential to ensure that the network of high quality green space is of the right type, ecologically functional, and is beneficial to both wildlife and people.

The green network should extend from existing woodlands surrounding the proposed CGA through and around the new housing and amenity facilities. The 'green corridors' could be a combination of native woodland and shrubs, hedges or species rich grassland. They have the added benefit, over amenity grassland, of requiring low maintenance, have a higher biodiversity value and are aesthetically more pleasing.

Access and Movement

First bullet point - we recommend that NLC refer to SWT's Access Network Development Plan.

It should be recognised that 'new route' infrastructure should form part of the green network as a linear habitat feature.

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Third bullet point – Developers should also be expected to contribute to improving the cycling and walkways network.

Affordable housing

First bullet point - *Please refer to SWT's comments, under affordable housing on page 5 of this report, which are also applicable here.*

Ground conditions and air quality

Third bullet point – In assessing *flooding issues*, future climate change scenarios, due to the effects of global warming) must be considered in assessing the flood risk potential of the development (e.g. changes in rainfall patterns - especially intensity and frequency of rainfall events). Sustainable urban drainage systems (SUDS) should be incorporated into the Masterplan.

Local Character

First bullet point – second sentence suggested insertion: The use of strong landscaping, *including the retention and expansion of natural heritage features*, and the provision of high quality open space *and green infrastructure* should be included as a means to achieving this.

20 De Vries, S (2001). Nature and health; the importance of green space in the urban living environment. Proceedings of the symposium 'Open space functions under urban pressure'. Ghent: 19–21 September

²¹ Green infrastructure is a term that encompasses features such as green networks, parks, gardens, allotments, rivers and canals, SUDS, green roofs, urban forestry and microhabitats

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Community Facilities and Services

Third bullet point - We would advocate that recreational facilities (e.g. playing fields) are located within walkable distance within the CGA. As such, they should be connected to dwellings by suitable paths and cycle ways. This could form part of the green network. What should be avoided is children relying on the car to access physical activity.

Sixth bullet point - *Please refer to SWT's comments, fifth bullet point on page 6 of this report, which are also applicable here.*

General point – it should be stated that developers will be required to contribute to the development of high quality open space and green infrastructure; both of which should be viewed as part of the green network. Management of the green infrastructure will also require a contribution from developers' otherwise this will be an extra cost borne by NL Council.

Utilities

Please refer to SWT's comments, under first bullet point (under Utilities) on page 6 of this report, which are also applicable here.

The Scottish Wildlife Trust would like to be kept informed of the progress of the North Lanarkshire Council's CGA project. Because SWT own wildlife reserves adjacent to the proposed South Cumbernauld CGA and, as we are developing a Cumbernauld Living Landscape Programme, SWT would like to engage with NLC from the outset, with the South Cumbernauld CGA project.

SWT believe the opportunity exists to work together with NLC to deliver a sustainable high quality community growth area that benefits the people of Cumbernauld and its wildlife. This coordinated effort will also add value to our own neighbouring wildlife reserves.

Yours sincerely,

Dr Maggie Keegan
Conservation Officer