

STEPPS & DISTRICT COMMUNITY COUNCIL

Working with North Lanarkshire Council for the Stepps Communities

- Stepps, Steppshill, Cardowan, Craigendmuir, Crowwood Grange, Coshneuk & Millerston -

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**Application Ref 20/01211 PPP Residential Development in Principle
Site to south of Dorlin Rd Cardowan North Lanarkshire**

Stepps & District Community Council **objects** to the above referenced planning application and requests that North Lanarkshire Council **refuses** permission for this development.

Summary

Development at the site would result in loss of this greenspace to the community with associated negative impact on wellbeing. True sustainable development requires that social, economic and environmental aspects must be given equal weighting in any decision-making process, and allowing development at this site would ignore negative social and environmental impacts in favour of economic concerns, putting profit before people and planet.

The Scottish Government has made clear its intention to remove conflict from the planning process and to reinforcing a plan-led system. The applicant has introduced conflict to the process by progressing an unnecessary application of little value to the local community on a green field site that is not allocated for development and in the proven absence of a shortfall in supply and, arguing that North Lanarkshire Council (NLC) must make its decision based on the outcome of a legal case, the applicant is proposing that the decision-making process is court-led as opposed to plan-led, a situation that clearly contradicts the ethos and spirit of Scottish Planning Policy (SPP) and is therefore unsustainable and unacceptable.

5-Year Effective Housing Land Supply

At para 5.11 of its Planning Statement Miller Homes states that *‘the most up-to-date land supply position at the time of writing’* is shown in the table at para 5.12 of Section 5.0. In this submission it is shown as Table 1 on page three.

Note: Points made by Miller Homes, in Sections 4.0 and 5.0 of its Planning Statement, are in italics with the rebuttal beneath each point.

“4.4 The North Lanarkshire Local Plan 2012 is out-of-date, as it is more than 5 years old and, as we explain later in this statement, there is a shortfall in the 5-year effective housing supply. In these circumstances, as explained in paragraph 125 of the SPP, development plan policies for the supply of housing will not be considered to be up-to-date.”

Comment: It is agreed that the first part of this paragraph is correct – the LDP is more than five years old and, for this reason alone, it is considered out of date. The assertion that there is a shortfall in the 5-year effective [land] supply is, however, incorrect as will be shown below.

“4.5 The consequence of this is that if this proposal can be described as development that contributes to sustainable development, which in our view it can, then there is a presumption in favour of it. As explained in paragraph 33 of the SPP, decision makers should also take into account any impacts which would “significantly and demonstrably” outweigh the benefits when assessed against the wider policies of the SPP. We consider the proposal against these wider policies later in this Statement under the heading of Scottish Planning Policy.”

Comment: Since there is a demonstrable surplus of effective housing land in the Cumbernauld sub-HMA (in which this development proposal sits), the North Lanarkshire Council private sector and the North Lanarkshire all-tenure housing land supply, the consequence suggested in the applicant’s paragraph 4.5 does not arise and there is no presumption in favour of sustainable development to be made.

“4.6 There has been a significant judgement by the Court of Session in 2020 arising from an appeal by Gladman Developments - [2020] CSIH 28 - which has provided greater clarity on how Scottish Planning Policy in respect to the “presumption in favour” is to be interpreted by decision makers.”

Comment: In the Gladman case referenced by the applicant, both parties (the applicants, Gladman Developments, and the Scottish Government) agreed that there was a shortage of housing land to be remedied and, consequently, the “presumption in favour” was activated. That is a different situation from this application in which there is no agreement that there is a shortfall to be remedied. Before the applicability of the “Quarriers judgement” to this case can be considered, not only must a shortfall be established but it must be (broadly) quantified as described in paragraph 49 of the judgement quoted by the applicants.

“4.7 As a matter of law, therefore, the application for housing development at Cardowan must be determined on this basis.”

Comment: This conclusion would only be valid if there was, in fact, a shortage of housing land that triggered the presumption in favour of sustainable development. Since there is no such shortage, even when using the Housing Land Requirement as the determinant of adequacy (as stipulated by the Court in paragraph 50 of the judgement quoted by the applicants) the relevance of the “Quarriers judgement” to this case is partial at best.

“4.8 It is notable that since the Quarriers decision, the Scottish Government has issued a consultation on proposed changes to Scottish Planning Policy, which remove reference to the “presumption in favour”, amongst other things. We make further reference to this later in this statement under the heading of Material Considerations. As a matter of law, the current consultation is a material consideration, but because it is only a consultation exercise at this stage it should be accorded very little weight. Indeed, the Scottish Government Chief Planner has clarified in a letter to Heads of Planning (4th September 2020) that in the meantime the terms of the extant SPP remain in place.”

Comment: We do not agree that the proposed changes to SPP should be accorded very little weight. The proposals are designed to clarify rather than fundamentally to alter policy. To the extent that the proposals do not contradict existing SPP, they should be considered to represent the Scottish Government’s policy intentions and, accordingly, be given due weight.

“5.10 As far as we know, the Council has never acknowledged that it had an ongoing shortfall in its 5-year effective housing land since Clydeplan 2017 was approved and before that, despite a number of appeal reporters concluding otherwise.”

Comment: This is a mysterious allegation. Why should the Council be expected to acknowledge a non-existent shortage?

“5.11 The most up-to-date land supply position at the time of writing is shown in the table below. This identifies the 5-year housing land supply measured against the Clydeplan Policy 8 Housing Requirements, and demonstrates a shortfall in that supply under two of the specified requirements in the period 2019 – 2024 i.e. North Lanarkshire wide All Tenure and North Lanarkshire wide Private Tenure. The housing supply information is taken directly from the 2019 Housing Land Audit. It should be noted that we have

not counted 'disputed sites' identified in the HLA for the 5-years from 2019 - 2024, on the basis that these sites will not contribute to the effective supply in the timescales stated. These disputed sites have been formally logged by Homes for Scotland (HfS) and the Council, where agreement could not be reached between the two parties as to their effectiveness and delivery timescales. We have reviewed the evidence and consider that this evidence supports the HfS position."

Table 1: North Lanarkshire 5-Year Effective Housing Land Supply Assessment (Miller Homes)

North Lanarkshire 5-Year Effective Housing Land Supply Assessment									
	Housing Land Requirement 2012 - 2024	Completions 2012-19	Housing Land Requirement 2019-24	5-yr Effective Supply (HLA 2019)	Demolitions 2019-24	Disputed 2019-24	5-yr Effective Supply 2019-24 (Actual)	Shortfall/ Surplus	
NCL All Tenure	14630	6950	7680	9100	1700	1462	5938	1742	
NLC Private	11590	5672	5918	6219	0	1442	4777	1141	
Cumbernauld HSMA Private	2900	1854	1046	2066	0	36	2030	984	

Notes

1. The 3 rows reflect the requirement of Clydeplan 2017 make provision for the all tenure Housing Land Requirement by Local Authority set out in Schedule 8, for the Private Housing Land Requirement by Housing Sub-Market Area set out in Schedule 9 and for the Private Housing Land Requirement by Local Authority set out in Schedule 10, and to provide for a minimum 5-year effective land supply at all times.
2. Column 1 is the Clydeplan Housing Requirement (Source Clydeplan Schedules 8, 9 and 10).
3. Column 2 is the number of houses completed in the plan period from 2012 - 2019.
4. Column 3 is the remaining Housing Land Requirements subtracting completions to date for the period 2019 – 2024.
5. Column 4 is the 5-Year Effective Housing Land Supplies from 2019/20 – 2024/25 taken from HLA 2019
6. Column 5 is the demolitions from 2019 – 2024.
7. Column 6 is the Disputed sites contained in HLA 2019
8. Column 7 is the actual 5-year housing land supply, subtracting demolitions and disputed sites from HLA 2019.
9. Column 8 is the shortfall/surplus in the 5-year Housing Land Supply when measured against the 5-year Housing Land Requirement. Red is a deficit and black is a surplus.

Comment: The table referred to compares the 5-year programmed output with the equivalent of 6.3 years of 2012-24 Housing Land Requirement from Clydeplan. By exaggerating the 5-year land requirement and excluding the non-programmed parts of the effective land supply, the applicant is conjuring up an entirely synthetic shortage. Even using these specious calculations, the applicant cannot arrive at a shortfall for the Cumbernauld sub-HMA private sector which is the most relevant consideration in this case. The Housing Land Audit is a Council document for which it is responsible. While the views of Homes for Scotland are relevant and will influence the Council's assessment of sites it is for the Council alone to exercise its planning judgement to include or exclude disputed sites in the HLA.

"5.12 Also, the Council's HLA fails to identify the proposed demolition of housing, which has not been taken into account by Clydeplan and is therefore being lost to the supply of homes which was assumed when it was approved. We understand from information provided by the Council that these demolitions will amount to approximately 1,700 homes in the period 2019 – 2024."

Comment: These demolitions are part of the Council's programme to update its housing portfolio. Demolition of existing units will make way for the erection of replacements on the same site(s). This is quite normal and there is no reason why Clydeplan should have taken them into account.

We set out below an accurate assessment of the 5-Year Housing Land Supply in Table 2 below.

Table 2: North Lanarkshire Council 5-Year Effective Housing Land Assessment

North Lanarkshire Council Effective Housing Land Assessment										
	A	B	C	D	E	F	G		H	I
	Housing Land Requirement 2012-24	Housing Supply Target 2012-24	Housing Land Requirement 2019-24	Effective Land Supply 2019	Surplus	Non-Effective units on effective sites	Adjusted Surplus		Effective Disputed Units	Undisputed Surplus
NLC All Tenure	14630	12720	6096	12482	6386	5415	11801		2396	9405
NLC Private	11590	10080	4829	9046	4217	4921	9138		2348	6790
Cumbernauld HSMA Private	2900	2520	1208	2946	1738	1188	2926		236	2690
Notes										
Column A from Clydeplan Schedules 8 and 9										
Column B from Clydeplan Schedule 7 (Cumbernauld from Schedule 9 HLR /1.15)										
Column C =5/12* Column A										
Columns D and F from NLC 2019 HLA - Finalised Housing Land Auit Totals (https://www.northlanarkshire.gov.uk/CHttpHandler.ashx?id=21656&p=0)										
Column E = Column D Minus Column C										
Column G = Column E plus Column F										
Column H from NLC 2019 HLA - Finalised Housing Land Auit Totals (https://www.northlanarkshire.gov.uk/CHttpHandler.ashx?id=21656&p=0)										
Column I = Column G Minus Column H										

Significant surpluses of housing land are evident for the North Lanarkshire Council area (both private and all-tenure) and for the Cumbernauld sub-HMA. This is true even if disputed capacity is removed entirely (and would still be true even if proposed demolitions were subtracted from the NLC All-Tenure figure).

There are three main reasons why this assessment differs significantly to that produced by the applicant:

1. The applicant has inflated the 5-year housing land requirement by the notional shortfall in output that occurred between 2012 and 2018. As a result, its 2019-24 housing Land Requirement represents not five but over six years of the 2012-24 HLR. There is nothing in the current version of Scottish Planning Policy to support this approach and the proposed alterations to SPP make it clear that it should not be used.
2. The applicant has taken the effective land supply to consist only of the programmed output for the 2019-24 period and have excluded the rest of the effective land supply from their calculations. There is nothing in the current version of SPP to suggest that this approach is correct, nor is there any logic in doing so. We note, furthermore, that the proposed amendments to SPP make it clear that effective capacity should not be excluded when calculating the adequacy of the supply merely because it is not programmed for completion during the period under review. Effective capacity has passed the tests of effectiveness and is therefore capable of being developed should it be required.
3. We have included both North Lanarkshire Council's "Total Effective" column from the "2019 Finalised Housing Land Totals" Table (which consists of the programmed output 2019-2026) and the "Non-Effective Units on Effective Sites" column from the same table. The latter represents capacity that has not been programmed for completion during the period, but which is, nevertheless, capable of being developed should demand exceed the programmed supply. This approach is consistent both with existing SPP and the proposed changes to it.

"5.13 The identified shortfalls in the 5-year effective housing land supply means that the planning application is supported by Clydeplan Policy H8 on the basis that it meets the five criteria identified in the Policy"

Comment: Since there are, in reality, no identified shortfalls Clydeplan Policy H8¹ is not relevant.

¹ We assume that this is a reference to Clydeplan Policy 8.

“5.16 and 5.17” [We are not reproducing the lengthy text]

Comment: Since there is no identified shortfall of housing land, the justifications given here for departing from Section 10 of Clydeplan are invalid.

“5.26” [We are not reproducing the lengthy text]

Comment: There is not a shortfall in the 5-year housing land supply against the Housing Requirements of Clydeplan.

“5.32 The above assessment of Development Plan policies demonstrates that the application complies with all relevant policies.”

Comment: This conclusion is not correct since the applicant is disregarding policies that apply where no shortage of housing land exists. We have demonstrated above that there is an ample supply of housing land in North Lanarkshire and it is the policies of SPP, Clydeplan and the LDP that cover this situation which are relevant and with which this application is non-compliant.

PPA-320-2144 (27 October 2020) Site to the west of Potassells Road, Muirhead, North Lanarkshire, G69 9EA

The appellant in its appeal submission indicated that there was a shortfall in the effective 5-year housing land supply across the North Lanarkshire local authority area. NLC in its appeal statement and committee report stated that, based on the 2018 housing land audit, there was no shortfall in the 5-year housing land supply.

For the purposes of this PPP objection it should be noted that at para 30 of the appeal report, Reporter Kirkwood concurs that *“On the basis of the information before me, I conclude that there is currently a minimum five years effective land supply for the Cumbernauld housing sub market area and the North Lanarkshire council area (both private and all-tenure).”*

Local Development Plan, Greenbelt Policy NB3A

The site is located within land designated as Greenbelt, for which there is a presumption against development. The proposal is for a large development of up to approximately 350 houses, and the prominent built form of the proposal will adversely impact on the existing rural landscape.

Furthermore, this prominent greenbelt site, located within the midpoint of Cardowan’s south boundary, prevents the coalescence of the existing older housing to the west, with the more recent housing developments to the east. The existing landscape is attractive and rural, and requires the greenbelt designation to be upheld, to maintain the rural setting and character of Cardowan.

Furthermore, the applicant, within the Pre-Application Consultation Report Section 4.6 ‘Loss of Green Space/ Wildlife’, has downplayed the community’s concerns regarding the loss of greenspace, noting that there were ‘some concerns raised regarding the loss of green space’, and omitted to record that objections were received highlighting that the proposals were contrary to the current and the modified emerging Local Plan.

The Quality of the Development, and Policy DSP4

The applicant has outlined the concept for the proposals in the Design and Access Statement. This statement provides site plans, and highlights that the proposals will provide enhanced opportunities for walks, protect the existing landscape features, provide a clear settlement edge, and create a landscape gateway.

Policy DSP4, Quality of Development, which applies to all applications, outlines that development will only be permitted where high standards of site planning and sustainable design are achieved. For the reasons set out below, this proposal does not meet the requirements of criterion 2, which refers to the importance of safeguarding or enhancing existing site features, nor criterion 3 which requires a high-quality development in terms of criterion a-f.

1. The concept plans indicate that approximately 90% of the site accommodates housing units, and the largest open space, which is no larger than one of the housing blocks, is hidden adjacent to the eastern boundary. As a result, the open aspect character of the site will be lost.
2. The large rectilinear block geometry, shown on the site plan, does not reflect the more organic character of the existing housing layout within Cardowan. The rectilinear geometry is similar to that adopted for the redevelopment of the Gorbals Hutcheson Town, which infamously became known as the 'coffin blocks', and was not successful.
3. To accommodate the slope of the site, the development will require significant remodelling of the existing landscape features, and change the character of the topography.
4. The Design Statement notes that the proposals will provide a clear settlement edge. Providing a clear settlement edge will significantly increase the visual impact of the development from the existing settlement and from the south. The design proposals will not mitigate the visual impact of a site that is a greenfield site, with no development.
5. The proposals are described as a landscape gateway. The organic form of the existing Southern settlement boundary provides a more attractive and accessible 'gateway' to the open fields. Constructing 350 housing units on this site will reduce accessibility to the countryside and walks within the countryside.

Modified Proposed Local Development Plan

At para 6.5 of the Planning Statement, the applicant's agent (Holder Planning) suggests the NLC Modified Proposed Local Development Plan (MP LDP) should carry little weight in determining this application. This opinion directly contradicts the opinion of the same agent (Holder Planning) in DPEA appeal ref PPA-320-2143. In that appeal, the agent suggested the MP LDP should carry weight, presumably because the site zoning in the plan supported their application; Reporter Shiel agreed the MP LDP should carry weight and allowed the appeal. In this application, the MP LDP zoning – greenbelt – does not support the application, resulting in Holder Planning completely reversing their previous opinion. The MP LDP represents NLC's current position on zoning of land, therefore significant weight should be given to this, rather than weighting applied to suit the arguments of the applicant.

Pre - Application Consultation

While the application is for approval in principle, S&DCC must point out that the applicant has not been clear at any stage as to how many houses they wish to build at the site. The Pre-Application Consultation documents stated "up to 250 houses", however documents in the application separately suggest "up to 300 houses", "300 houses" and "300-350 houses". The local community is confused as to the applicant's position and feels misled by the original position stated at Pre-Application Consultation and subsequent upward revision. The PAC report makes no mention of the overwhelming opposition to the development, as voiced at the public meetings and responses. It would be helpful and illuminating if the applicant published the written responses received.

Transport

SPP states clearly that developments should be located within reasonable walking distance of local facilities and public transport. The evidence presented by the applicant is weak and relies on theoretical modelling and speculation as reasons why the application meets SPP requirements.

- The application documents include a detailed Transport Assessment. S&DCC would like to point out that Section 4.4 of the assessment states "*these parts of the assessment are based on published service data for bus and ferry services*". There are, rather obviously, no ferry services in or close to the site, suggesting a clear lack of attention to detail and/or a cut & paste approach to compiling this report.
- Bus – the site lies outwith 800m of current bus services; the applicant suggests that building houses will increase the probability of services being reinstated. The applicant is unaware that S&DCC has several times lobbied First Group to have services reinstated in the past 10 years,

working with local politicians, SPT and other groups, without success. There is no evidence to suggest this position would change with additional housing. The assessment acknowledges that any service would require subsidy (from SPT presumably), and there is no guarantee that funding would be available when constraint on budgets is significant. In addition, the road network serving the site is wholly unsuitable for large buses, so any service would be local in nature and constrained in terms of capacity. It is clear then that the applicant is relying on factors wholly out with its influence to make the case that bus travel represents a realistic mode of travel for this development.

The Transport Assessment is presented as supporting the development. The assessment is based on a snapshot over a very short time period and theoretical modelling, and does not reflect the reality of the road traffic situation in Cardowan and Stepps:

- Cardowan Rd, the main site access, is single lane in each direction, however resident on-street parking effectively reduces this to a one-way operation in many places; significantly increasing the volume of traffic would exacerbate this issue with road safety implications. This could also lead to increased traffic on Clayhouse Rd and Loch Road, turning these residential streets into rat runs. Loch Rd is unadopted and suffers significant issues due to subsidence and is regularly closed or limited due to ongoing repairs.
- The junction at Cardowan Rd / Cumbernauld Rd is very often queued back beyond the roundabout (>40metres) at Cardowan Rd at peak times and does not clear in one cycle, likewise queueing at the east and westbound carriageways of Cumbernauld Rd is a regular peak time feature.
- The assessment rightly identifies the Cumbernauld Rd / Avenue End Rd / Station Rd junction as a pinch point. Local residents regularly report peak time journey times of 20 minutes to travel the one mile distance between Lenzie Rd and this junction, and the Avenue End northbound arm regularly takes up to 3 cycles to clear at peak times
- The assessment was carried out (12/12/19) prior to the opening of Robroyston Station (15/12/19); this has increased traffic on Station Rd and renders the assessment of right turn traffic from Cumbernauld Rd westbound as out of date, and the proposed junction layout change also out of date
- The proposed layout changes at Cumbernauld Rd / Avenue End Rd/Station Rd junction would place straight-on traffic from Cumbernauld Rd westbound lane in conflict with right-turning traffic from the eastbound side, due to alignment of the road.
- The large increase in new homes at the former Cardowan colliery site has led to overspill parking issues on residential streets around the train station – clear evidence that commuters continue to use private cars to travel the short distance to the station. The development would only add to existing parking issues and associated nuisance and inconvenience for local residents.

The development would therefore negatively impact road safety and exacerbate traffic queuing leading to increased air quality impacts for the local community.

Education Facilities

It is well documented and accepted by all parties with local knowledge (NLC, developers) that the local schools - Stepps PS and St. Joseph's PS – have reached and exceeded maximum capacity due to additional development in the area. This will be further exacerbated by the Gateside/Hornshill development (up to 200 units) that is expected to commence in 2021. The developer of that site has agreed to a contribution of £7,800 per unit towards education facilities in NLC. The contribution however does not ensure capacity at Stepps or for any future speculative developments such as this. Both schools are constrained by lack of available land, with Stepps PS also affected by unstable ground conditions and a severe drainage issue – this has resulted in the loss of well-used community facilities at the school for a period of 2 years, use of

temporary buildings and significant upheaval for staff/pupils. There is no simple immediate remedy to this issue, and it must be stressed that developer contributions will not change this situation.

Local Services

There is a lack of healthcare facilities in the Northern Corridor area, a situation acknowledged by NHS Lanarkshire, who have stated publicly that the infrastructure inherited from NHS Greater Glasgow and Clyde (GG&C) when health boundaries changed is “not fit for purpose” and will not be considered so until a new health centre is built. In the meantime, many community health services continue to be provided by NHS GG&C under service level agreements, an unsatisfactory situation for local residents that results in increased private car use. There are no current plans for a health centre for the Northern Corridor, and no source of funding has been identified at this time, so it may be many years before the local population (25,000) has adequate and quality health services delivered locally. Additional housing would only place further stress on existing health facilities.

SUDS

The applicant seeks to make a positive point about the introduction of a SUDS pond as if this is an altruistic investment; as all parties know, SUDS is a requirement of any new development, hence no weight should be given to this.

Amenity

As evidenced by other responses to this application, the Dorlin Rd site is a well-used, highly valued recreation area. There is overwhelming evidence, acknowledged and championed by the Scottish Government and World Health Organisation amongst others, that access to local green spaces is of vital importance to physical and mental wellbeing. The recent restrictions associated with Covid 19 have resulted in increased use of local greenspaces and this has rightly been recognised as a hugely important factor in maintaining mental health. Loss of this area to unnecessary development is unacceptable to the local community.

Contribution to Net Zero Ambition

The Design Statement is completely unambitious regarding the Net Zero carbon objective adopted by Scottish Government. Reference is made to complying with building standards – this is a minimum requirement, compliance in non-negotiable – and use of efficient fossil fuel boilers. The applicant is well aware of the expected requirement to prevent new developments accessing the gas network from 2024, however makes no attempt to exceed current regulations or introduce novel low carbon technology. No assessment of heat network opportunities has been carried out, despite SEPA guidance for this scale of development. There is nothing of substance then to support the view that this development contributes anything to Scottish Government environmental objectives other than the minimum required by regulations.

Cardowan Moss SINC

The site is located next to Cardowan Moss, an area of wetland classified as a Site of Interest for Natural Conservation. This area of wetland appears to be in poor condition according to the Cardowan Moss Management Plan, however wetland is an important habitat for biodiversity and where peat is present, as a natural carbon sink. Therefore, the interaction between the proposed development and Cardowan Moss is particularly important. Should the development cause the wetland to dry out, which the Management Plan (MP) states is a possibility, this would cause further degradation. The MP suggests that water from the development should be channelled, via drains, to the Moss, with the formation of standing water pools to retain water on the Moss. However, pools would not allow a more diverse wetland vegetation, which could potentially include peat-forming plants, notably sphagnum, to colonise.

Peat

It is noted that the MP and the Geoenvironmental Assessment recognise that there is peat on the Moss, and that this could extend onto the site of the proposed development. However, no assessment has been carried out of the location and depth of peat deposits. This is necessary to protect the peat, and also because it would form an unstable base for construction.

Quality of assessment

Although an assessment of plants has been carried out, there has been no assessment of animal life, a clear omission, particularly as wetland can be important habitats for invertebrates and some vertebrates.

Potential for contaminated land

The Geoenvironmental report states that an area of the proposed development site was previously used as a dump for slag and/or colliery spoil and/or domestic refuse. This has the potential to contaminate the Moss if disturbed and needs to be evaluated in detail as not only is it a risk to the Moss, but permitting development on contaminated land would be unsatisfactory. It is also noted that there are some issues with the ground stability in this part of the site which could render it unsuitable for residential development. SEPA should be consulted to allow them to raise concerns about contaminants from this area of the site draining onto the Moss, given the possibility that these contaminants could travel into watercourses.

Methane

There are deep ground sources of gases, most likely methane from coal seams, which could affect the site. These need further investigation as high flows of these gases could make the site unsuitable for housing.

Electricity Sub-Station

An electricity sub-station is adjacent to the site. The possibility of any contamination close to the sub-station should be investigated.

Alice Morton (Chair)

Stepps and District Community Council