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19 October 2019

Development and Regeneration Services

PLS

Glasgow City Council

231 George Street

Glasgow G1 1RX

Objection to Asset Transfer

I wish to object to the Asset Transfer request submitted by Locavore Community Interest Company in relation to an area within Bellahouston Park.

There are a number of points arising from my review of their application form as follows.

Page 8 – It talks about East Renfrewshire schools, no mention of Glasgow schools. I do not believe Glasgow City Council should be supporting East Renfrewshire Schools.

Page 9 – 4.3 Locavore is not aware of any restrictions on the use or development of the land. This area is part of Bellahouston Park and as such is covered by the title deeds. It is my understanding that any use of this area should be beneficial to Bellahouston Park. I cannot see any benefit to Bellahouston Park from this application.

Page 10 – Locavore does not foresee any negative consequences – again this is very concerning. When the area was purely a City Council plant nursery it was generally clear by c5pm. The situation now is that Locavore staff and/or volunteers are in the vicinity until much later and as a consequence it requires to be well lit. This is not conducive to being a good environment for the bats in the area. From the bat survey carried out on behalf on Glasgow City Council in 2018 it is clear that this area is important to the Bats. A recommendation from the survey was that Bat Boxes were put up in this area

of Bellahouston Park .Due to the fact that it is an offence to disturb bats and bats have been seen in this area this must be a concern.

Page 12 – Bees - Glasgow City Council's Allotment Strategy 2009- 2013

Beekeeping in Allotments and Parks states - Research has shown that there can be a negative impact on wild bumblebee populations in areas with a high density of domesticated honeybee hives. Bumblebees and other wild pollinators feed on a wider range of plant species than domesticated honeybees and therefore are very valuable as pollinators so any negative impact on populations should be avoided. It is therefore recommended that sites are enhanced for biodiversity prior to beehives being established, by creating areas of additional nectar rich flowers and providing undisturbed areas for nesting/overwintering bumblebees, solitary bees, butterflies and hoverflies. These recommendations will also benefit honeybees.

As there bees have already been brought onto the site without the requirement to enhance it prior to this I am concerned that Locavore has not accepted that this area is part of Bellahouston Park and as such has already rules in place regarding bees. I would also point out that there are bee hives already in the Park at the House of an Art Lover. Glasgow Pollinator Plan 2017 – 2027 (Glasgow City Council) states The biological audit for Glasgow (2016) has recorded 12 bumblebee species, 27 solitary bees, 1 honeybee, 96 hoverfly species, 1164 beetle species, 26 butterfly species and 868 moth species. Not all of these species are pollinators but many are. There are likely to be more that have not yet been recorded. These animals are found in the neutral and acid grasslands across the city but also in woodlands, wetlands, urban spaces and farmland habitats.

Bellahouston Park has been identified as having acid grassland, one a few areas within the city. Based on this and the above I cannot see how bringing more bees into Bellahouston Park is beneficial for the wild bees. Again I think this shows Locavore's lack of knowledge of Glasgow City Council's own advice regarding Parks in Glasgow and that the area in question is part of Bellahouston Park.

Page 13 – Support – “In doing this we adopted an open and transparent approach by making an outline of our plans for the site available on our website”. People were asked to pledge support but there was no way of recording that you did not support this proposal. Therefore I would suggest that it is a very one sided approach and not at all possible to be representative. There are no comments from users of Bellahouston Park and there has been no notices up at the site giving information to park users. The nearest neighbours to this site are not even mentioned in the proposal, 38 and 38A Dumbreck Rd nor are the Friends of Bellahouston.

Locavore also says that it has support. I must question this statement as from the information provided only 1235 people from Glasgow City Council area supported their plans , Glasgow has a population of over 600,000 (figures from GCC factsheets). This “support” amounts to only 0.2 % !

Page 15 – The Prince of Wales Hospice is not a neighbour of the site. Its address is Halfpenny Lane, Pontefract, I do not see them coming all this way to Glasgow to grow food. The Prince and Princess of Wales Hospice, Glasgow’s wedding present to The Prince and Princess of Wales, is situated in Bellahouston Park but this is not what the Asset Transfer Request Form says.

Page 18 - £750 a year rent for agricultural land, the area that is being requested is parkland. The Nursery is within Bellahouston Park, something that Locavore appears not to have grasped. This rent appears very low for parkland.

The Friends of Bellahouston group has asked that Bellahouston Park is added to the Register of Common Good Property and the current consultation by Glasgow City Council is open until 27 Oct 2019 which is after the cut-off date for this Asset Transfer Request. If Bellahouston Park is added to the Register then this would require Glasgow City Council to handle this Asset Transfer Request in a totally different manner as detailed below.

Part 8 of the Community Empowerment (Scotland) Act 2015 aims to "increase transparency about Common Good assets and community involvement in decisions taken about their identification, use and disposal".

The Act places new duties on the council in relation to common good property:-

- Section 102 of the Act places a duty on the council to establish and maintain, after consultation, a register of property which is held by it as part of the common good.
- Section 104 imposes the requirement for public consultation before the disposal or change of use of a common good property.

Based on the foregoing points I do not believe there are sufficient grounds for the transfer to proceed and that in the best interests of the Park and Citizens of Glasgow respectfully, but most strongly, propose that this Asset Transfer Request be turned down.

Yours sincerely

