

Local Development Plan Main Issues Report: Synopses of responses

These synopses attempt to capture in a summarised style all comments submitted in response to the Main issues Report. However, in developing the Proposed Plan the full responses will be referred to.

Issue 1 - Key Regeneration Sites

Do you agree that the following (Lomondgate, Dumbarton Waterfront, Esso Bowling, Bowling Basins, Carless, Queens Quay) are the Key Regeneration Sites within West Dunbartonshire and with the preferred uses suggested for each site? What action is required from West Dunbartonshire Council, other public agencies and the site owners to bring about the successful development of these sites?

The **Scottish Government** supports a Masterplan approach to all of the Key Regeneration Sites. **Historic Scotland** is broadly content with the proposed uses for those sites with heritage interests, and supports masterplanning. **Transport Scotland** seeks early involvement in any masterplanning of the sites. **SEPA** is supportive of the regeneration strategy proposed by WDC and of these sites being included in the LDP. **SEPA** have some concerns regarding development adjacent to the River Clyde in relation to climate change and flood risk and impact on designated sites. **SEPA** and **SNH** are supportive of green network enhancement in the key regeneration sites. **SNH** is supportive of masterplanning of sites and concerned that much of the western extension of Esso Bowling is not suited to built development. **Scottish Canals** agrees with the inclusion of all sites, especially Bowling Basins.

Clydebank Rebuilt agrees with the approach of focussing on a limited number of primary regeneration sites, to include Carless and Queens Quay. **Strathleven Regeneration** agrees Lomondgate should be identified as a Key Regeneration Site. **SPT** recognises the sites listed as key sites.

Balloch & Haldane Community Council and **Dumbarton East & Central Community Council** agree with the Key Regeneration Sites identified. **Bowling & Milton Community Council** objects to the inclusion of Bowling Basins as a Key Regeneration Site, as it pre-empts the consultation being undertaken by Scottish Canals. **Silverton & Overtoun Community Council** agrees with Dumbarton Waterfront, Esso Bowling and Bowling Basins as Key Regeneration Sites, but has reservations regarding the preferred uses for Bowling sites.

The **RSPB** welcomes green network enhancement on each of the Key Regeneration Sites. It would not like to see development encroaching onto previously undeveloped land at Esso Bowling, and suggests development on all

of the sites could exacerbate flooding. **The Scottish Wildlife Trust** has concerns about the development of Bowling Basins, and wish to see much of the land designated as Green Belt and for nature conservation value.

Clydeside Regeneration/Dawn Developments agree with the Key Regeneration Sites identified but not the proposed uses for Queen's Quay, considering that the site should be mixed-use and include an 8,000 sq.m superstore.

One individual agrees with Dumbarton Waterfront, Esso Bowling and Bowling Basins as Key Regeneration Sites, but has reservations regarding the preferred uses for Bowling Basins. Another individual considered that WDC's idea of regeneration ignores social problems within communities in favour of speculative retail and residential property developers and considers that the reference to green network enhancement is not convincing.

Issue 2 – Dumbarton Waterfront

Should the land use planning and design framework for Dumbarton Waterfront be updated?

Option 2a (preferred) - The Dumbarton Waterfront Design Framework should be revised as part of the Local Development Plan process and subsequently adopted as Supplementary Planning Guidance.

Option 2b - The Dumbarton Waterfront Design Framework should be retained as the preferred land use and design framework for the Dumbarton Waterfront area.

Historic Scotland supports Option 2a and would want to be involved in updating the Framework. **SEPA** states that the revision should take account of the new/alterd legislative environmental framework and the Council should recognise that subsequent findings may detrimentally impact on development opportunity aspirations. **SNH** supports Option 2a and recommends that the Framework be expanded to include Levensgrove and Sandpoint and that it should recognise that the relocation of Dumbarton Football Club would create potential for expansion/enhancement of green space at the northern foot of Dumbarton rock.

RSPB and **SPT** support the preferred option. **RSPB** notes that consideration should be given to potential impacts on the SSSI/RAMSAR site and that new/revised supplementary guidance may require SEA/HRA. **SPT** asks that the framework recognises that much of the area covered is within reasonable walking distance of Dumbarton's rail stations and that the legibility and quality of walking/cycling routes between the waterfront and stations should be considered. **SPT** also suggests that residential uses could be given priority in the areas within

400 metres of the A814 and the Framework should also continue to make provisions for east/west cycle routes.

Dumbarton East & Central Community Council and **Silverton & Overtoun Community Council** support Option2a. The former wishes for the Framework to include and protect the tidal basin from infill and ask that the revision is a consultative document. The latter seeks assurance that the tidal basin will not be in-filled. **Balloch & Haldane Community Council** highlights the need for a good quality walkway from the Quay to the Castle.

Vico Properties and **Dumbarton Football Club** support Option 2a. **Vico Properties** expresses that many elements of the existing framework are over prescriptive and **Dumbarton Football Club** would like to see the revision include options for relocation of the football ground and would like to be involved in the revision process.

An individual supports Option2a but seeks assurance that the tidal basin will not be in-filled.

Issue 3 – Esso Bowling

What should the developable area of the Esso Bowling opportunity be?

Option 3a (preferred) - Extend the developable area of the Esso Bowling site to include land to the west up to Dumbuck junction but south of the A82.

Option 3b - Limit the developable area of the Esso Bowling site to that shown in the West Dunbartonshire Local Plan.

The **Scottish Government** supports proposals that encourage the regeneration of this site, but notes that further information is needed regarding the level and type of development proposed. In relation to the road proposals, it states that no need has been identified for an A82 relief road and so it is expected that any road here would be funded by the Council or other parties. **Transport Scotland** has not identified the need for improvements at this location for operational purposes either but request that the access strategy for the site should be discussed with it as early as possible. **SNH** does not support the preferred option considering that development of the western extension could damage the Inner Clyde SSSI and SPA, and that development would prevent the nationally important coastal habitats being able to migrate inland as sea levels rise. However, the relief road, and possibly some built development, could be accommodated on the higher landward fringe of this area. **SEPA** will object in principle to any greenfield development on the functional floodplain. It is not fully supportive of Option 3a until a feasibility study confirms the potential environmental impact. Development of greenfield land should be targeted to

avoid the floodplain. **Scottish Water** is concerned about flooding issues, especially on Dumbarton Road; all surface water from any new development in this area would need to be collected on a separate system and discharged to the Clyde. **Network Rail** has highlighted that the feasibility of bridging the railway line in two places for the proposed relief road needs to be investigated before Option 3a is taken forward. However, Option 3a would provide an opportunity to close the level crossing west of Bowling Station – this is an extremely important consideration with several implications.

SPT requests the Council works with it and Transport Scotland concerning the need for and impact of the A82 diversionary route through the site. It also calls for the site to be served by buses, and walking/cycling routes to be retained/provided.

Bowling & Milton Community Council does not object to the preferred option on condition that the SPA and RAMSAR designation is included along the entire waterfront of the developable land so as to protect the nature conservation value. Both **Bowling & Milton Community Council** and **Balloch & Haldane Community Council** support the A82 relief road provided, on condition for **Bowling & Milton Community Council** that it terminates in Bowling no further east than the entrance to the former Esso site. **Dumbarton East & Central Community Council** also agrees with the benefit of an alternative route to the A82 but has concerns about the use of green belt and would prefer that the least amount of land is used to reduce negative environmental impacts. **Silverton & Overtoun Community Council** does not agree with the preferred option. A new road would be accepted, but the remainder should be retained as green open space.

Clydebelt considers that any change to the greenbelt here would have a detrimental impact on biodiversity and could cause the coalescence of Milton and Bowling. They consider that the site should be enhanced for nature conservation and become part of the floodplain. The **RSPB** considers that residential use on the extension area would fragment the habitat corridor, affect the SSSI and SPA, prevent the area being used to mitigate coastal squeeze and affect the floodplain. It also suggests that proper remediation work would allow residential use on the brownfield area.

Dumbarton Football Club supports Option 3a as it would raise interest in the redevelopment of the whole site, and the proposed relief road. The site has currently been discounted as a relocation option by DFC. However, if development was to progress within an acceptable timescale, it could be reinstated.

Finally, an individual has suggested that the proposed relief road could become the primary route, and that the existing A82 a local access route, which would allow Milton to expand south into the extension area. Another individual accepts

the need for the new road, but reflects the views of Silverton & Overtoun Community Council in terms of the primary use of the site for green open space. They also specifically object to Scott's Yard as part of the Key Regeneration Site.

Issue 4 – Carless, Old Kilpatrick

How should the boundary of the Carless Key Regeneration Site be defined?

Option 4a (preferred) - Extend the site to include open space to north and west to facilitate access to the site.

Option 4b - Retain site boundary as currently designated within the West Dunbartonshire Local Plan.

Historic Scotland highlights the potential impacts of Option 4a upon the Forth and Clyde Canal – a scheduled monument - and considers this would require sensitive design to ensure no unacceptable impacts on the canal or its setting. **SEPA** considers the additional land release proposed under Option 4a is unlikely to exacerbate the known environmental concerns and constraints that already exist and welcome proposals to improve the chances of securing remediation of the site. **SNH** considers Option 4a to be acceptable and recommends that the Proposed Plan seeks to retain and enhance existing nature conservation assets. **Sportscotland** draws attention to the possible loss of a sports pitch and the requirement for compensation if it is lost. **Scottish Canals** agrees with Option 4a and suggests a fixed bridge over the canal to minimise delays to boat traffic and maintenance costs. **Scottish Water** indicates that there should be sufficient capacity to accommodate this development, with no network issues known, although this is to be confirmed.

Clydebank Rebuilt agrees with Option 4a. **SPT** advise that the preferred option, specifically extending the site to the north, would provide the best opportunity to allow the site to be served by a commercial bus operator and that initial financial support would be required for buses to service this site.

Parkhall North Kilbowie and Central Community Council favour Option 4b as Option 4a would be costly and unnecessarily delay development of the site.

Clydebelt favour Option 4b as access from Freelands Place would result in the loss of one of the few open/play spaces south of Dumbarton Road. It suggests that space should be left for green corridors along the Clyde and Canal.

Issue 5 – Queens Quay, Clydebank

What mix of development should the Local Development Plan promote on the Queens Quay regeneration opportunity?

Option 5a (preferred) - The regeneration of this site should be housing-led, with ancillary retail, office and tourism/leisure.

Option 5b - A mixed use approach should be promoted, including major retail and commercial leisure uses, in order to facilitate the regeneration of the remainder of the site.

The **Scottish Government** asks for clarification as to why development on this site is likely to be at a lower density than originally proposed, and stresses that any new design should be in compliance with Designing Places and Designing Streets. **SNH** considers that this site offers major opportunities for the delivery of the Green Network. **SEPA** states that clarification of the flood risk is required, but that management of the risk is acceptable on this site. It also notes that development may impact on air quality. **Scottish Water** indicates that there should be sufficient capacity to accommodate this development, with no network issues known, although this is to be confirmed.

Clydebank re-built supports Option 5a, being concerned that a major retail foodstore at Queens Quay could undermine the existing town centre. It considers that the mix and scale of uses on Queens Quay should complement and integrate with the town centre, not compete with it. **SPT** states that the proximity of the site to public transport provision would support housing-led regeneration of the site, but that there would need to be developer's financial support to enhance public transport including safeguarding a route for Fastlink.

Parkhall North Kilbowie & Central Community Council support the redrawing of the town centre boundary southwards, and consider that this would provide development on Queens Quay sooner, provide a more mixed approach including major retail, and would alleviate traffic problems. **Our Holy Redeemer's and St Margaret's Parishes** supports Option 5a, preferring to see high quality homes, rather than significant retail development on the site.

Renfrewshire Council agrees with Option 5a.

Clydebelt supports Option 5a. However, although it agrees that retailing should be kept to the Clyde Shopping Centre, it has concerns about the density of development and the levels of public open space proposed for Queens Quay.

Clydeside Regeneration/Dawn Developments do not support the preferred option. They consider that only major retail use can cross fund the infrastructure

needed to achieve the regeneration of the whole area. **Asda Stores Ltd** agrees with Option 5a.

Finally, there has been an individual response agreeing with Option 5a to protect the town centre. This respondent would also like to see greater leisure facilities at Queens Quay, including playing field facilities which could be used by the community and the college, and a small stadium for Clydebank FC.

Issue 6 - The Strathleven Corridor

Do you agree that the Strathleven Corridor should be recognised as a regional regeneration priority that would benefit from an area-wide co-ordination of regeneration activity? What are the organisational and physical priority actions required to advance the regeneration of the area?

The **Scottish Government** considers the Strathleven Corridor to be an exciting opportunity and wants the Proposed Plan to describe the ambition of the Corridor and to include a design framework considering inter-connections and placemaking. **SEPA** is generally in favour of the regeneration of brownfield land over the release of additional greenfield land. **SNH** consider the Corridor is especially significant for Green Network opportunities and that area wide co-ordination would fit well with the scale of thinking necessary for delivering the Green Network.

The **National Park Authority** seeks early engagement and a partnership approach and for developments to adhere to the Park's plans and aims. The **Strathleven Regeneration** agrees the Corridor should be a regional regeneration priority and look forward to playing a full part in its future regeneration. **SPT** states that the Corridor is well served by rail stations and frequent connections to Glasgow and that public transport improvements will be required to each of the key regeneration sites.

Dumbarton East & Central and **Silverton & Overtoun Community Councils** both agree the Corridor should be a regional regeneration priority. The former expects the Green Belt to be protected and the latter seeks an equal emphasis between development and green space, green belt and green network. **Balloch & Haldane Community Council** identifies road bottlenecks at several locations and comment that the industrial estates are an eyesore and require investment.

Barratt Homes West Scotland agrees the Corridor should be a regional regeneration priority and seeks identification of land for housing at Stirling Road, Bonhill as a complementary action. **Dumbarton Football Club** supports the recognition of the Corridor in the LDP and considers that the relocation of its stadium to Young's Farm could assist in the delivery of a number of the Corridor's strategic objectives.

One individual agrees that the Corridor should be recognised as a regional regeneration priority, with an equal emphasis placed on development and 'green' issues. Another individual does not consider that the Corridor is strongly supported by the National Planning Framework or the Strategic Development Plan.

Issue 7 - The Lomond Canal

What approach should the Local Development Plan take to the Lomond Canal?

Option 7a (preferred) - The Local Development Plan should offer support to the concept of the Lomond Canal subject to full consideration of its environmental impact. Any proposals for development affecting the route of the canal should be assessed against their economic impact and the probability of the canal being developed.

Option 7b - The Local Development Plan should fully support the proposed Lomond Canal, identify its proposed route and safeguard it from development that could prevent its implementation.

Option 7c - The proposals for the Lomond Canal should not be included in the Local Development Plan.

The **Scottish Government** considers that the Forth and Clyde Canal has a natural link with boating activity on Loch Lomond. **Transport Scotland** considers further work is necessary to develop and test the Canal concept. **Historic Scotland** is content with the preferred option. **SNH** considers that the Lomond Canal should not be included in the LDP at this time. **SEPA** accepts Option 7a, but has concerns regarding the Canal's viability and there being insufficient information to fully assess it in relation to the Water Framework Directive. **Sportscotland** is supportive of the proposal to establish a navigable link between the Clyde and Loch Lomond, but state that the Clyde and Loch Lomond walk/cycle way should be preserved as part of any redevelopment. **Scottish Canals** continues to support the Lomond Link. It is concerned that Option 7a may not adequately safeguard the proposed route and would like to see the route identified in the Plan and a presumption against development that would stop the Canal going ahead.

The **National Park Authority** agrees with Option 7a and lists where it considers more information is required in relation to the Canal proposal. **SPT** does not consider the Canal will offer a public transport opportunity and its route should take account of impact on public transport and active travel routes. **Strathleven Regeneration** offers support to the Canal subject to full assessment of its environmental impact, and suggest that whilst there is demonstrable effort to

progress the Canal there should be a presumption against development that would prevent it from happening. It highlights that the land take requirement of the Canal highlighted makes a significant incursion into the Lomondgate Area 5 housing site and the business park site.

Balloch & Haldane Community Council state that the project should be forgotten about and the River Leven dredged and made navigable. **Dumbarton East & Central Community Council** supports the project and believes it would bring significant benefit to Dumbarton. **Silverton & Overtoun Community Council** has reservations about the Canal's environmental impact which outweigh any economic benefits.

Clydebelt considers that the River Leven could become navigable again, and that the Canal would ruin the River Leven and its environment. **Loch Lomond Rowing Club** agrees with Option 7a but have concerns the Canal would have a significant impact on its ability to access the River Leven and would wish to be fully engaged as a stakeholder. The **RSPB** states that the LDP should not support the Lomond Canal until it has fully considered its environmental impact.

Dumbarton Football Club supports Option 7a, and considers that the relocation of its stadium to Youngs Farm would provide an important interaction between that site and the canal. The **Walker Group** support Option 7a, subject to consideration of environmental impacts of the Canal before full inclusion in the Plan. It highlights that the land take requirement of the Canal highlighted makes a significant incursion into the Lomondgate Area 5 housing site and the business park site.

One individual would like to see the Canal project brought forward. Another individual supports Option 7a but has reservations about the likelihood of the canal coming forward in the lifetime of the LDP and reservations about environmental impacts. Another individual supports Option 7c, stating that the River Leven could be navigable, and there has been no research into how the River Leven would be affected by the Canal.

There was some support for the Lomond canal on **Facebook/Twitter**, but more comments suggesting the money could be better spent elsewhere and others questions the necessity of having a canal follow the route of a river that could be made navigable. Some were worried about the environmental impact of building a canal and others raised concerns about how it could fall into poor condition if not maintained/cleaned.

Issue 8 – SEIL: Lomondgate and the Vale of Leven Industrial Estate

What approach should the Local Development Plan take to planning for Lomondgate and the Vale of Leven Industrial Estate, including the designation of the SEIL?

Option 8a (preferred) - The SEIL should be designated around Lomondgate and the Vale of Leven Industrial Estate with a mix of the defined key sectors and other industrial and business uses allowed in these locations. This option would require to be complemented with actions to improve the amenity of the Vale of Leven Industrial Estate.

Option 8b - Lomondgate, defined as the BBC Scotland Studios, business park, roadside services and Aggreko, should be identified as the SEIL opportunity and reserved for the key sectors of Business and Financial Services, Creative and Digital Industries and Tourism. The VoLIE should continue to be designated as a local industrial and business area but with no strategic status.

The **Scottish Government** states that the setting of Strathleven House and Doocot should be fully considered in any development strategies for the area. **SNH** supports Option 8a as a mechanism for delivering the aims of the LDP including the Green Network through revised masterplanning, stressing the benefits of green infrastructure for business development.

The **National Park Authority** agrees with Option 8a. **SPT** supports Option 8a, noting however that the site is not well served by rail and consideration will need to be given to improve the quality of bus services on Stirling Road and within the site. **Strathleven Regeneration** agrees with Option 8a, stating that to realise the potential of Lomondgate and the Vale of Leven Industrial Estate (VoLIE) it will be essential to have a flexible, business-led and market driven approach and that the LDP should include land elsewhere for 'secondary and tertiary' uses to relieve pressure on the VoLIE.

Balloch & Haldane Community Council's contribution observes that the Vale of Leven and Alexandria Industrial Estates are in dire need of investment, and the first focus should be on getting the infrastructure correct. **Dumbarton East & Central Community Council** supports the preferred Option.

The **Walker Group** would welcome greater flexibility in the consideration of ancillary and compatible uses, particularly those which would bring further and sustainable economic activity to the area and does not support uses at Lomondgate being restricted.

Issue 9 – SEIL: Clydebank Riverside

How should the Clydebank Riverside SEIL be defined?

Option 9a (preferred) - The Clydebank Riverside SEIL should extend over the area shown in Map 9 with the defined key sectors promoted within this area alongside other planned uses.

Option 9b - The Clydebank Riverside SEIL should be specifically defined as one or more of the following locations:

- *Clyde Gate*
- *Carless*
- *Rothesay Dock West*

SNH supports Option 9a as a mechanism for delivering the aims of the LDP including the Green Network through revised masterplanning, stressing the benefits of green infrastructure for business development.

Clydebank Rebuilt agrees with Option 9a stating that it would provide greater opportunities to promote and secure investment. **SPT** will seek to support the Council in taking forward transport solutions to support regeneration of Clydebank Riverside, stating further public transport improvements will be required to enhance the quality of public transport access to the site.

Our Holy Redeemer's & St Margaret's Parishes believe the Council is right to prioritise flexibility in the definition of the SEIL providing the approach does not harm the likelihood of a housing-led development of Queens Quay and that access to the riverside is maintained.

Clydeport, Clydeside Regeneration/Dawn Developments and Peel Environmental Ltd agree with the preferred option. **Clydeport** states that the Rothesay Dock West site should have the same designation as the remainder of the Clydebank Riverside but considers that the prospects of economic, industrial or business development at the site are limited. **Peel Environmental Ltd** considers failure to identify the whole area would unnecessarily limit opportunities for sites to come forward and meet the objectives of including land within the SEIL.

Issue 10 – Land for new and expanding businesses

Is there sufficient land within West Dunbartonshire to accommodate new and expanding businesses?

Option 10a (preferred) - Increase the supply of land identified to ensure at least a 10 year supply of land for industry and business over the Plan period.

Option 10b - The current supply of land for industry and business is sufficient.

The **Scottish Government** welcomes that Option 10a goes beyond the requirements of Scottish Planning Policy in relation to industrial and business land. It recommends that the Proposed Plan seeks to provide a range of sites that are likely to meet needs in terms of size and quality and that new development is directed towards sites which can be easily accessed.

Clydebank Rebuilt agrees with Option 10a and has identified significant demand, particularly for industrial/workshop premises, in Clydebank. **SPT** supports Option 10a as early identification of land for new and expanding business assists informing the development of related transport plan to support the development of these sites.

Dumbarton East & Central Community Council supports Option 10a and oppose the use of any green belt land to augment the industrial land supply. **Balloch & Haldane Community Council** states that the focus should be on upgrading existing areas to attract investment.

Clydeside Regeneration/Dawn Developments, Clydeport and Dumbarton Football Club all agree with Option 10a. **Clydeport** supports the preferred option on the basis this would allow the reallocation of exiting industrial land for alternative uses.

Issue 11 -Non-industrial uses within industrial and business areas

What flexibility should exist for non-industrial uses within industrial areas?

Option 11a (preferred) - Existing industrial and business areas should be categorised according to the type and extent of non-business and industrial uses appropriate within that location:

- *Strategic (Lomondgate and Clydebank Riverside) – office and light industry uses with limited ancillary development to serve the immediate location only;*
- *Safeguarded – office, industrial and storage and distribution uses with limited ancillary development to serve the local area only;*
- *Flexible – office, industrial and storage and distribution uses preferred but other non-retail commercial uses considered favourably in vacant sites/premises.*

Option 11b - Flexibility across all industrial and business areas for commercial uses, with the exception of town centre uses.

Option 11c - A presumption against any uses other than business, industrial or storage and distribution uses in existing industrial and business areas.

Applications for alternative uses should be assessed against criteria which seek to protect the role, function and character of such locations.

The view of the **Scottish Government** is that the preferred Option 11a sits comfortably with the Scottish Planning Policy which expects authorities to include opportunities for mixed used development within sites allocated for business. **Sportscotland** supports Option 11a, agreeing there is logic in having the flexibility to provide services for those working in industrial and business areas and having the opportunity to locate uses which encourage and enable physical activity, such as gyms.

SPT supports the preferred option as most likely to recognise the different transport requirements of different land uses. **Clydebank Rebuilt** and **Strathleven Regeneration** have expressed concern that the preferred option could restrict the development of strategic sites by reducing flexibility, potentially directing investment out of West Dunbartonshire.

Dumbarton East and Central Community Council support option 11b as providing the best opportunity for encouraging enterprise.

Option 11a is supported by **Peel Environmental Ltd**, which considers it provides greater certainty and clarity on the areas where non-industrial/business uses are acceptable. It requests that industrial uses are considered acceptable on strategic sites. **Clydeport** states that Option 11a is preferred on the basis that historic industrial/business areas such as Clydebank Riverside is categorized for allowing flexibility for the introduction of non-retail uses.

Issue 12 – Network of Centres

What strategy should the Local Development Plan adopt for its Network of Centres?

Option 12a (preferred) - The Local Development Plan's Network of Centres strategy should have a town centre focus as set out in Table 12.

Option 12b - An alternative strategy comprising:

- *No specific role and function identified for each of the three town centres;*
- *No goods type or unit size restrictions in Edge of Centre Commercial Centres;*
- *Retail development opportunities identified outwith town centres including at:*
 - *Antartex, Alexandria*
 - *Lomond Galleries, Alexandria*
 - *St. James Retail Park, Dumbarton*
 - *Hardgate Roundabout, Clydebank*
 - *Queens Quay, Clydebank*
- *Wider range of local centres/shops identified.*

The **Scottish Government** supports Option 12a. **Historic Scotland** has concerns that Option 12a could compromise future options for the A-listed Lomond Galleries, and that the Proposed Plan's policies should reflect the desirability of supporting a sustainable long term use for this nationally important building.

SPT favours the preferred option where the protection and enhancement of town centres' role as transport hubs is most likely to be achieved. It also suggests that if the alternative option was taken forward, this would require significant public transport improvements at these sites and financial support for new/extended bus services required.

Balloch & Haldane Community Council suggests that Alexandria should include a covered shopping centre, that Antartex should move into Lomond Galleries, and the overflow car park for Lomond Galleries behind the baths should be upgraded. **Dumbarton East & Central Community Council** would like St James Retail Park included as part of Dumbarton Town Centre and ask that the LDP identifies edge/out of centre retail development opportunities where they have planning permission. **Silverton & Overtoun Community Council** suggests that St James Retail Park should be included as part of Dumbarton town centre.

Inverclyde and **East Dunbartonshire Councils** support Option 12a, with **East Dunbartonshire Council** requesting that the wider roles of town centres be acknowledged.

The Theatres Trust does not support option 12a as it does not include reference to restaurants, hot-food takeaways, cultural facilities and any other elements of the daytime and evening economy. **Clydebelt** supports Option 12a.

LaSalle Investment Management (Artizan Centre) supports Option 12a but with some revised wording suggested to Table 12. **Vico Properties Plc** (Castle Street) also supports Option 12a. **Asda Stores Ltd** supports Option 12a with some changes to Table 12 reflecting the existing convenience retail offer at St James Retail Park. The **Edinburgh Woollen Mill** supports Options 12a. **Clydeside Regeneration/Dawn Developments** (Queens Quay) agrees in part with Option 12a but ask that the LDP promote the Queens Quay site as part of an extension to Clydebank town centre. **Hermiston Securities Ltd** (Lomond Galleries) supports Option 12b and request that Lomond Galleries should be identified as edge of centre (as well as commercial centre) due to its close proximity to the town centre. It also wishes to see the unrestricted class 1 retail development opportunity at Lomond Galleries identified. **Wm Morrison Supermarkets Plc** highlights that Table 12 does not make it implicit that the Dumbarton Morrisons store shares the same edge of centre/commercial centre status as St James Retail Park. The **British Land Company Plc** (St James Retail Park) is of the opinion that the preference for 'bulky goods' retailing on

edge-of-centre retail parks does not wholly reflect the nature of current out of centre retailing requirements. It also suggests that retail development less than 1,000sqm may be appropriate and justifiable in out of centre retailing locations and that the Plan should continue to support retail/leisure proposals in Commercial Centres and continue to identify land east of Saint James Retail Park as a development opportunity. **Chester Properties Ltd** (Clyde Retail Park) requests that the role and function attributed to the Clyde Retail Park in the MIR be changed to reflect its nature and proximity to Clydebank town centre.

An individual suggests that St James Retail Park should be included as part of the town centre.

Issue 13 - Alexandria Town Centre

What should the preferred strategy for Alexandria Town Centre be?

Option 13a (preferred) - Deliver the town centre strategy as set out in Map 13 which incorporates the following:

- Consolidated Town Centre boundary to omit the area on the eastern side of the railway line.*
- A new foodstore within Mitchell Way with refurbishment of the remaining properties and properties on Main Street.*
- Public Realm Improvements on Main Street, Mitchell Way and Bank Street.*
- Residential development on the Leven Cottage and Kippen Dairy sites.*
- Mixed use redevelopment along the south side of Bank Street.*

Option 13b - Retain the existing town centre boundary plus the other elements mentioned in Option 13a.

The **Scottish Government** states that Option 13a seems appropriate.

SPT asks that full consideration should be given to maintaining and enhancing walking and cycling access routes to the rail station even if the land to the east of the railway line is removed from the town centre.

Balloch & Haldane Community Council does not support proposals for another foodstore in Alexandria town centre, and suggests alternative changes to the town centre.

Issue 14 - Clydebank Town Centre

What should the preferred strategy for Clydebank Town Centre be?

Option 14a (preferred) - Deliver the town centre strategy as set out on Map 14 which incorporates the following:

- The existing town centre boundary.*
- A principal shopping area as the preferred area for retail uses supported by a policy which will seek to retain Class 1 uses, although this could change from a blanket approach to one which applies only to certain frontages or certain thresholds.*
- An opportunity for a new superstore on the Playdrome site.*
- A Mixed Use/Commercial Area, being the preferred location for non-retail uses.*
- Refurbishment/redevelopment/expansion of the South Mall.*
- An events area.*
- An improved transport hub.*

Option 14b - Amend the town centre boundary to include Clyde Retail Park and Queens Quay (part) and do not identify a principal shopping or mixed use/commercial area.

The **Scottish Government** considers Option 14a to be the most reasonable. **Scottish Canals** supports the identification of an Events Area on Map 14 and would like to see a design brief prepared for the town centre to encourage interaction with the canal.

Clydebank Rebuilt is concerned about the impact of any proposal to extend the town centre south of Dumbarton Road. **SPT** supports Option 14a and suggests that the transport hub area includes the rail station and access routes to it and that improvements to other 'mini' bus hubs in the town centre should be considered.

Parkhall North Kilbowie & Central Community Council supports Option 14b. **Our Holy Redeemer's & St Margaret's Parishes** supports Option 14a

HP Properties Ltd (Clyde Shopping Centre) supports Option 14a. **Asda Stores Limited** partially supports Option 14a, excluding the proposals for a new superstore on the Playdrome site.

Chester Properties (Clyde Retail Park) supports Option 14b, but excluding significant retail development on Queens Quay. **Clydeside Regeneration/Dawn Developments** (Queens Quay) supports Option 14b, considering that a supermarket on the site can complement and improve the town centre offer.

Issue 15 - Dumbarton Town Centre

What should the preferred strategy for Dumbarton Town Centre be?

Option 15a (preferred) - Deliver the town centre strategy as set out on Map 15 which incorporates the following:

- The existing town centre boundary.*
- A principal shopping area as the preferred area for retail uses supported by a policy which will seek to retain Class 1 uses, although this could change from a blanket approach to one which applies only to certain frontages or certain thresholds.*
- A Mixed Use/Commercial Area, being the preferred location for non-retail uses.*
- A mixed-use development opportunity to the south of Castle Street.*
- The redevelopment or refurbishment of the Artizan Centre predominantly for retail uses.*
- A Civic Quarter or business use opportunity to the north of Castle Street.*
- The identification of Riverside Lane (the waterfront) for development, for the purposes of the Lomond Canal and/or new buildings containing a mix of commercial and residential uses.*
- Access improvements to the town centre, vehicular at Castle Street/Dumbarton Road junction and pedestrian between St James Retail Park and the town centre.*
- Town Centre – Castle walkway route.*

Option 15b - In addition to the elements of Option 15a identify the area to the north of the Artizan Centre as a retail development opportunity but do not identify a principal shopping area.

The **Scottish Government** considers Option 15a to be the most appropriate.

SPT agrees with preferred Option 15a.

Dumbarton East & Central Community Council agrees with Option 15a but also suggests that St James Retail Park should be included as part of the town centre and that the policy applied to the principle shopping area changes from a blanket restriction on non-retail uses to a threshold/certain frontage approach.

Silverton & Overtoun Community Council supports Option 15a but think that the town centre should be extended to include St James Retail Park.

LaSalle Investment Management (Artizan Centre) supports the principles of Option 15a but seek further consideration to be given to a tighter retail core, with primary and secondary retail areas, and differentiated physically and in policy terms from St James Retail Park. **Vico Properties Plc** (Castle Street) supports Option 15a but would like to see the Castle Street opportunity extended to refer to unrestricted retail/leisure/residential uses. **The British Land Company Plc** suggests there is an opportunity to reinvestigate whether St James Retail Park

should be included within Dumbarton Town Centre. **Wm Morrisons Supermarkets Plc** suggests that Option 15a be amended to include Morrisons Store within the town centre boundary.

An individual supports Option 15a but think that the town centre should be extended to include St James Retail Park.

Issue 16 - Affordable housing

Is an affordable housing policy required within the West Dunbartonshire Local Development Plan?

Option 16a (preferred) - Yes, a contribution towards meeting affordable housing requirements should be expected from every private sector housing site over a certain size, including those seeking renewal of existing consents.

Option 16b - Yes, a percentage affordable housing contribution should be expected from any greenfield release sites identified by the Plan or obtaining planning permission during the Plan period.

Option 16c - No, the Glasgow and the Clyde Valley Housing Need and Demand Assessment does not justify the need for an affordable housing policy within West Dunbartonshire. The inclusion of such a policy could be a barrier to the recovery of the housebuilding sector in the area at this time.

The **Scottish Government** states that the Council should consider the justification for an affordable housing policy in principle, given that there is no shortfall of affordable housing in the HNDA and that the Local Housing Strategy does not propose such a policy. The Plan should also be sensitive to the current climate, in particular whether or not such a policy would stimulate or deter investment.

Silverton & Overton Community Council agrees with the Option 16a and considers the contribution towards meeting affordable housing should be 15%. This is supported by one individual response. **Balloch & Haldane Community Council** indicates some support, but are concerned that an affordable housing policy could put off potential developers or lead to small scale developments exempt from any contribution. **Dumbarton East & Central Community Council** supports Option 16c. **Our Holy Redeemer's & St Margaret's Parishes** do not endorse an option, but consider that the need to attract high-quality housing for must be balanced with the need for affordable housing.

East Dunbartonshire Council strongly supports the inclusion of an affordable housing policy and suggests a 'quota' type policy.

Homes for Scotland states that an aspiration for additional affordable housing is not evidence of need and that there is no evidence of need or justification for an affordable housing policy, as required by SPP, in the Strategic Development Plan, the Housing Needs and Demand Assessment or the Local Housing Strategy. It therefore supports Option 16c. **Clydeside Regeneration/Dawn Developments** considers that there is no justification for an affordable housing policy in the Housing Needs and Demand Assessment, and by placing the burden on private developers it will further slow the recovery in the residential market, especially if applied retrospectively. They support Options 16c and 16d in part. **Taylor Wimpey** considers that any affordable housing policy must be evidence based, and needs to consider different delivery mechanisms. **Barratt Homes West Scotland** agrees with Option 16a specifically in relation to its site at Stirling Road, Bonhill.

Issue 17 - Land for housing

Does West Dunbartonshire's housing land supply provide an effective and generous supply of land for housing, including providing for a sufficient choice of sites?

Option 17a (preferred) - The housing land supply should be supplemented by the allocation of some of the following sites for housing development:

Clydebank

*Carleith, Duntocher
Cochno Road East, Faifley
Duntiglennan Fields, Duntocher
Rosebery Place, Clydebank
Rothesay Dock, Clydebank
Stanford Street Depot, Clydebank*

Dumbarton and the Vale Of Leven

*Castlegreen Street, Dumbarton
Dumbain Crescent, Haldane
Dumbuckhill, Dumbarton
Esso western extension, Milton
Garshake Road, Dumbarton
Lomondgate Area 5, Dumbarton
Sandpoint Marina, Dumbarton
Stirling Road, Bonhill*

Option 17b

The existing housing land supply provides a generous choice of land for housing development over the Plan period to 2019 and no further land should be allocated.

The **Scottish Government** considers that more detail is required from the Housing Needs and Demand Assessment relating to need and land supply for each housing sector. The Council should clarify whether it is committed to increasing housing supply, and how this can be achieved. The Proposed Plan needs more detail on the land supply in unit terms and what the level of generosity is. It should explicitly reflect Designing Places and Designing Streets, and require their policy and principles to be adopted entirely. **SNH** states that the preferred Option 17a, which supports the release of some additional land for housing would need to ensure against a loss of emphasis on regeneration, the 'cherry picking' of sites and inappropriate urban expansion. Whilst the reuse of brownfield sites can improve environmental quality, the release of small sites in the greenbelt can have adverse and long term landscape and visual impacts. **SEPA** objects in principle to any greenfield development proposed within the functional fluvial floodplain. **Scottish Water** expects that there is sufficient water and waste water capacity for all sites, although this will have to be confirmed when site capacities are known. All surface water is to be collected and treated separately. **Sportscotland** highlights the need to compensate for the loss of any sports pitches as a result of their allocation for housing land. Any new development should be aware of the demand for sports facilities and align with Designing Places/Streets in prioritising walking and cycling.

SPT asks that sites which do not enjoy good public transport accessibility are not allocated for housing.

Clydebelt supports Option 17b because there is no strategic requirement for additional land, second hand houses on the market provide flexibility, and additional release could result in existing brownfield sites lying derelict for longer.

Homes for Scotland considers that the land supply is inadequate to deliver the requirement of the SDP. It is up to the LDP to identify a land supply which is effective over 10 years, meets all tenure needs, is generous and provides a range and choice. In addition, the Main Issues Report does not provide information on the adequacy of the land for affordable housing. Although there is no indication of capacities, it is suggested that even if all 14 sites identified in Option 17a were allocated this would fall short of what is required by SPP and the SDP. In addition allocating brownfield sites will not help to widen choice. The Council needs to provide an audited land supply for affordable housing, identify the capacities of the sites listed in Option 17a, identify a further range of possible housing sites and consider the range and choice they provide. **Taylor Wimpey** suggests that the allocation of all the sites under Option 17a would still not provide a generous supply of land for housing.

Silverton & Overton Community Council agrees with Option 17a but objects to some of the sites listed. An individual agrees with Option 17a but also has some reservations. **Bowling & Milton Community Council** agrees with Option 17b,

considering that existing sites can meet the required housing target whilst having no significant environmental impact.

The following comments on specific sites were received.

Carleith, Duntocher - **Historic Scotland** considers that there is very limited scope for development without adverse impacts on the World Heritage Site and its setting, and therefore recommends that it should not be a preferred allocation. **Clydebelt** objects to its removal from greenbelt, apart from the farm buildings. New development could constitute ribbon development, compromise the setting of the Kilpatrick Hills Scenic area and sever a wildlife corridor/green network link. An individual opposes the release of this site owing to the possible impact on the site of the Antonine Wall, and another individual because there is no requirement for the site to be released.

Cochno Road East, Faifley - **East Dunbartonshire Council** considers that it would be inappropriate to take forward this site prior to a green belt boundary review being carried out as part of the new East Dunbartonshire LDP, and strongly suggest that this site is not considered as one of the potential sites to be taken forward. **Clydebelt** objects to the removal from the green belt; referring to the need to preserve specimen woodland and retain for recreation. Any increase in population would further strain Kilbowie Roundabout.

Duntiglennan Fields, Duntocher – **Clydebelt** objects to the site's removal from greenbelt. The site is prominent, and houses would be intrusive on skyline. The increase in population would put more strain on local roads and the Kilbowie Roundabout. **Taylor Wimpey** suggests that this site is the only one in the Clydebank area which can be considered effective and deliverable in the short term and therefore should be the first option for inclusion. Two individuals oppose the release of this site for reasons including there being enough land for housing, visual impact and impact on local road network.

Rosebery Place, Clydebank - **Our Holy Redeemer's & St Margaret's Parishes** support. **Clydebelt** objects to the demolition of existing offices as there are plenty of brownfield sites in the vicinity for housing, and development would result in loss of greenspace along the Canal.

Rothesay Dock, Clydebank – **SEPA** states that a flood risk study will be required. **Clydebelt re-built** also agrees with the sites within their Masterplan area being allocated for housing, including part of Rothesay Dock. **Our Holy Redeemer's & St Margaret's Parishes** support. **Clydebelt** state the site should be retained for industrial use. **Clydeport plc** supports new housing development on this site to complement recent new development and help fund significant repairs needed to the quay wall.

Stanford Street Depot, Clydebank - **Our Holy Redeemer's & St Margaret's Parishes** support.

Castlegreen Street, Dumbarton - **Scottish Water** states that any new development in Castlegreen Street must not exacerbate the flooding issues in the area. **SEPA** states that the revision of site boundaries may be required to take account of flooding issues. **Dumbarton East & Central Community Council** supports.

Dumbain Crescent, Haldane - **SEPA** states that the revision of site boundaries may be required to take account of flooding issues. **Balloch and Haldane CC** does not consider that it is an ideal site for housing.

Dumbuckhill, Dumbarton – The **Scottish Government** states that these sites should be accessed via the local road network excluding the quarry access road. **SNH** states that housing development here is likely to be visually intrusive and damage the landscape setting of Dumbarton and/or Milton. **Silverton & Overton Community Council** objects to these sites being allocated due to severe adverse environmental impact, visual impact on an historic hill site and access issues. An individual shares these views. **Dumbarton East & Central Community Council** strongly objects to the allocation of Dumbuckhill. **Clydebelt** objects citing visual intrusion and traffic issues. **Tarmac** considers that the housing land supply should be supplemented by the allocation of these sites (with revised boundaries), to provide additional generosity and choice. It considers both sites have few constraints and that they can be developed quickly.

Esso western extension, Milton - **SNH** does not support the preferred option considering that development of the western extension could damage the Inner Clyde SSSI and SPA, and that development would prevent the nationally important coastal habitats being able to migrate inland as sea levels rise. However, the relief road, and possibly some built development, could be accommodated on the higher landward fringe of this area. **SEPA** states that the revision of site boundaries may be required to take account of flooding issues. The **RSPB** consider that residential use on the extension area would fragment the habitat corridor, affect the SSSI and SPA, prevent the area being used to mitigate coastal squeeze and affect the floodplain. It also suggests that proper remediation work would allow residential use on the brownfield area.

Garshake Road, Dumbarton – The **Scottish Government** states that a Transport Assessment should be undertaken to determine the impact of amended traffic patterns and any mitigation required. **Dumbarton East & Central Community Council** supports. **Clydebelt** objects to the demolition of the Council HQ.

Lomondgate Area 5, Dumbarton – The **Scottish Government** states that access should be taken from the local road network. **SNH** states that the site provides good quality separation between Dumbarton and the Vale of Leven. Recent rapid urbanisation in this area makes it more important to retain such semi-natural habitats. **SEPA** states that the revision of site boundaries may be required to take account of flooding issues. **Dumbarton East & Central Community Council** supports. **Clydebelt** opposes as its release would be contrary to policies to reuse brownfield sites and maintain riverside green corridors and green networks. The site is liable to flooding, would constitute ribbon development, and would not enhance the view of Dumbarton from the A82. The **Walker Group** and **Strathleven Regeneration** both support Option 17a through the allocation of this site, stating that the site is effective and the developable area is not within the functional flood plain.

Sandpoint Marina, Dumbarton - **Historic Scotland** would welcome early involvement in the development of proposals here and suggest a development brief might be helpful, owing to potential for a significant impact on Dumbarton Castle. **SNH** states that housing development here could damage the qualifying interests (migratory fish) interests of the Endrick Water Special Area of Conservation. **Dumbarton East & Central Community Council** supports. **Clydebelt** states that leisure and tourism uses would be preferable and any development should be of a high architectural standard.

Stirling Road, Bonhill - **Barratt Homes West Scotland** agrees with Option 17a in respect of this site (with revised boundaries) which can contribute to providing the required generous land supply, increase choice and can be delivered in the short term, unlike the majority of the alternative sites in Option 17a.

Dumbarton FC seeks clarification of the status of their extant planning consent for 37 units on part of their existing site and requests a more positive acceptance of residential uses on the stadium site be put in place.

Scottish Canals intend to take forward a community engagement process for Bowling Basins. They consider that the site offers an opportunity for new housing in addition to other uses as noted in the West Dunbartonshire Local Plan. They also wish to highlight the opportunity at Bowling to live on the water on residential berths.

Issue 18 – Green Network Opportunities

What approach should the Local Development Plan take to safeguarding and *enhancing the Green Network*?

Option 18a (preferred) - The Local Development Plan should identify a Green Network and make use of the Green Network Opportunities Mapping

methodology to identify priorities for its enhancement. Supplementary Planning Guidance should be developed to support this approach.

Option 18b - The Local Development Plan should identify and protect open spaces but a Green Network should not be specifically identified.

The **Scottish Government** supports preferred Option 18a and suggests the Proposed Plan may wish to protect parts of the green network or future network where linkages can be made or strengthened. It is concerned about the lack of mention of the Glasgow and Clyde Valley Forestry and Woodland Strategy. **SEPA** is supportive of preferred Option 18a and the use of Supplementary Guidance. **SNH** supports preferred Option 18a and recommends that the coastline and ‘blue’ network be incorporated as part of the green network. **SportScotland** supports the principle of preferred Option 18a but notes that the current Local Plan contains specific protection of sports pitches and requests this remains in the LDP.

The **Glasgow and Clyde Valley Green Network Partnership** strongly supports Option 18a and the development of Supplementary Guidance. **SPT** states that in developing Supplementary Guidance consideration should be given to active travel routes within the Green Network.

Dumbarton East & Central Community Council and **Silverton & Overtoun Community Council** support preferred Option 18a.

Clydebelt welcomes the Council’s commitment to the implementation of the green network. The **RSPB** supports Option 18a.

Clydeside Regeneration/Dawn Developments states that the development of Queens Quay would improve accessibility between the site and the wider area.

One individual strongly agrees with Option 18a. Another suggests that the Faifley Knowes greenspace area should be identified as a significant addition to the green network.

Issue 19 – Provision of open space through new residential development

What requirements should the Local Development Plan make in relation to the provision of open space associated within new residential development?

Option 19a (preferred) - Contributions to open space should be sought on a basis of 6 ha per 1,000 new residents. Determination of whether the contribution should be on-site, off-site or financial will be made with regard to analysis of quantitative, qualitative or accessibility deficiencies supported by Supplementary Planning Guidance.

Option 19b - Open space requirements will be negotiated on a site-by-site basis having regard to open space provision in the locality.

Option 19c - Open space to be provided on-site based on a requirement of 6 ha per 1,000 new residents.

The **Scottish Government** generally supports Option 19a, but query the proposed increase in the level of open space required and whether it needs to increase in this way given potential impact on development viability. It also encourages open space to be usable and multi-purpose and a masterplanning approach to its provision. With regards to existing open space, the **Scottish Government** expects these to be protected. **SEPA** consider Option 19a to be acceptable. **SNH** supports Option 19a and recommends the adoption of Accessible Natural Greenspace Standards. **Sportscotland** supports Option 19a and further highlights that it is important to recognise the role of non residential development in providing for walking and cycling routes. It would welcome Supplementary Guidance.

The **Glasgow and Clyde Valley Green Network Partnership** suggests that standards are set at a settlement scale based on access to multifunctional, high quality open space rather than a single standard across the authority area.

Dumbarton East & Central Community Council asks that off-site or financial contributions be retained within the community area of the development. **Silverton & Overtoun Community Council** agrees with Option 19a but ask that the provision of open space be as close as possible to, or within, the residential development.

RSPB and **Clydebelt** also support Option 19a. The **RSPB** highlights the biodiversity value of existing and new open spaces.

Homes for Scotland does not agree with any of the options, contending that a 6ha per 1,000 population standard has not been justified and that the argument that new development contributes to pressure on the green network is flawed and the justification for developer contributions is weak. **Clydeside Regeneration/Dawn Developments** supports Option 19b 6ha/1,000 people standard to be unjustified.

An individual agrees with Option 19a but ask that the provision of open space be as close as possible to, or within, the residential development, consistent with being a component of the Green Network.

Issue 20 - Green belt boundary review

Should the West Dunbartonshire green belt boundary be amended?

Option 20a (preferred) - The green belt should be amended at the following locations:

Include within Green Belt

*A82, Renton Woods
Arthurston Road, Haldane
Bonhill North
Stirling Road, Bellsmyre
Gruggies Burn, Dumbarton
Milton North
Old Kilpatrick East
Dalmuir Park, Clydebank*

Remove from Green Belt

*Cats Castle, Dumbarton
Lomondgate South (Area 5), Dumbarton
Dumbain Crescent, Haldane ☐
Esso Bowling (Dumbuck Extension) ☐☐
Bowling Basins •
Carleith Farm, Clydebank ☐*

Option 20b - The green belt boundary should remain as in the West Dunbartonshire Local Plan.

The Council's approach with regard to the green belt boundary review has been commended by the **Scottish Government**, which makes no comments on the detailed boundary amendments.

SNH partly supports the preferred option, in particular the extension of the green belt in the listed locations, and subject to some site specific comments. **SEPA** finds the preferred option acceptable provided the impact on the current environmental status of sites involved is recognised. **Sportscotland** has expressed concerns with the loss of green belt and would only support this approach where it is clear the purpose of the areas removed in providing outdoor recreation and access would not be compromised. **Sportscotland** ask that the impact of removing sites from the green belt on sport and recreation interests be fully assessed.

Homes for Scotland advises that housing land is required in addition to the sites identified under Issue 17 with possible further consequences for the green belt boundary.

With regard to specific sites, the following comments were received:

Bowling Basins – **Bowling & Milton Community Council** objects to the proposed amendment at Bowling Basins.

Esso Bowling (Dumbuck Extension) – **SNH** disagrees with the preferred option to remove this site from the green belt as do **RSPB, Clydebelt, Silverton and Overtoun Community Council** and an individual. **Dumbarton East & Central**

Community Council support only a minimal release of land to enable the development of the Esso Bowling site.

SNH consider the site provides two valuable green belt functions: contributing to Milton's good quality landscape setting and separating Milton from nearby settlements.

Bowling and Milton Community Council has no objection to the removal of the site from the green belt.

Lomondgate South - **SNH** considers the existing boundary to be robust and the site to perform an important green belt function. **Sportscotland** observes that the site potentially includes the Clyde-Lomond cycleway and the future Lomond Canal link, both resources of significant value for sport which could come under pressure if removed from the green belt.

The release of Lomondgate South from the green belt is opposed by **Clydebelt**, which state its release would be contradictory to focus on brownfield sites and the protection of green corridors. It observes that the site is liable to flooding and considers development would damage the setting of Dumbarton.

Dumbarton East & Central Community Council supports its release.

Walker Group and **Strathleven Regeneration** support the adjustment of the green belt boundary at Lomondgate. The **Walker Group** states the environment can accommodate development and that enhancements, including a strengthening of the green belt edge, can be achieved in the remaining undeveloped area.

Dalmuir Park – **Parkhall North Kilbowie & Central Community Council** and Clydebelt welcomes the proposal to include Dalmuir Park in the green belt.

Dumbain Crescent – **Balloch & Haldane Community Council** have highlighted an archaeological site in the location of the proposed boundary change.

Stirling Road, Bellsmyre - **Dumbarton East & Central Community Council** supports its inclusion within the green belt.

Gruggies Burn – **Silverton & Overtoun Community Council** and an individual contributor agree with the proposed extension to the green belt in this location. **Dumbarton East & Central Community Council** supports its inclusion within the green belt.

Young's Farm – **Dumbarton FC** is seeking the removal of this site from the green belt for the development of a community sports hub and associated enabling uses.

Stirling Road, Bonhill - **Barratt Homes West Scotland** recommend that this site is released from the green belt.

Duntiglennan Fields - **Taylor Wimpey** state Duntiglennan Fields should be released from the green belt, that it would have at least a neutral impact on the green belt boundary with the potential for enhancement.

Dumbuckhill - **Tarmac** state that sites at Dumbuckhill offer a better opportunity for housing development, would create a stronger, more identifiable boundary and should be released from the green belt.

Cats Castle - **Dumbarton East & Central Community Council** supports its release.

Issue 21 - Local Nature Conservation Sites

How can the Local Development Plan best protect locally important habitats and biodiversity?

Option 21a (preferred) - The Plan should clearly identify and protect the network of Local Nature Conservation Sites shown on Map 21.

Option 21b - The impact of all development upon local biodiversity should be assessed having regard to available survey material, including the 2008 Review of Local Nature Conservation Sites. Locally important nature conservation sites should not be differentiated in the Plan.

SEPA is supportive of Option 21a. **SNH** is supportive of Option 21a and additionally recommends that geological sites be identified and that the LDP should promote the development of integrated habitat networks.

The **Glasgow and Clyde Valley Green Network Partnership** advises that reference should be made to the Integrated Habitat Network model as a means of identifying important areas of habitat for ecological connectivity which don't necessarily have protective designations.

RSPB agree with Option 21a and would be happy to provide further advice to the development of guidance to help ensure developments enhance biodiversity.

Dumbarton East & Central Community Council and **Silverton & Overtoun Community Council** support Option 21a, with the latter calling for the Esso Bowling site to be designated for nature conservation.

Clydebelt supports Option 21a, but notes that an LNCS designation has not done much to protect some sites. **Strathclyde Geoconservation Group** recommends that Local Geological Sites be added to the LNCS network and given equal protection.

An individual supports Option 21a has called for the nature conservation value of the Esso Bowling site to be recognised through designation.

Issue 22 - Designated Landscape Area

How can the Local Development Plan best protect areas of landscape quality?

Option 22a (preferred) - The Plan should identify a Local Landscape Area based on revised boundaries of the existing Regional Scenic Area. The Local Landscape Area designation should be coupled with a green belt or countryside designation.

Option 22b - The existing Regional Scenic Area should be identified as a Local Landscape Area and remain the primary land use designation in that area.

Option 22c - No landscape area should be identified for enhanced protection, with all applications affecting the landscape assessed with regard to the Landscape Character Assessment, other survey material and advice.

The **Scottish Government** states Option 22a seems reasonable in terms of the proposal to revisit the boundaries of the existing Regional Scenic Area for a new Local Landscape Area. **SEPA** is supportive of Option 22a. **SNH** supports Option 22a and strongly support a boundary review but note that it should not be presumed the boundary will be revised from that of the Regional Scenic Area. **Sportscotland** supports Option 22a requesting consideration be given to other areas in addition to the Kilpatrick Hills.

The **National Park Authority** supports Option 22a

East Dunbartonshire Council supports Option 22a and recommends a joint review.

Dumbarton East & Central Community Council and **Silverton & Overtoun Community Councils** support Option 22a. **Balloch & Haldane Community Council** considers the higher section of the Stonymullen and Cameron Muir should be designated as part of the Local Landscape Area owing to their relationship with the National Park.

Clydebelt supports Option 22a, emphasising the importance of the south west facing slopes of the Kilpatrick Hills and querying the protection offered by

landscape designations. The **Mountaineering Council of Scotland** supports Option 22a as the best means of protecting the Kilpatrick Hills.

Lomond Energy supports Option 22a but states that landscape value is relevant to all development proposals and a policy framework which addressed the principle of development and not just landscape issues is appropriate.

An individual supports Option 22a.

Issue 23 – Wind energy

Should the Local Development Plan include a spatial framework to direct the location of wind farms and turbines?

Option 23a (preferred) - No, a criteria-based policy should be applied to all areas with no preferred or non-preferred areas identified.

Option 23b - Yes, it is considered that the green belt should be identified as requiring significant protection and the designated landscape area as an area with potential constraints. Remaining land should be identified as an area of search.

The Scottish Government states it is important to have a spatial framework and criteria based policy working in association. It requests that the Council proactively consider if there is merit in providing spatial direction for sub 20MW wind farms. It is disappointed that there is no consideration of other renewable technologies. **The Forestry Commission** is concerned with the amount of woodland loss to renewable developments. Guidance has been issued which should be taken account of in the Proposed Plan. **SEPA** considers that Option 23b, having a spatial framework, would provide more certainty for developers. **SNH** prefers Option 23a, a criteria-based policy approach, and state the LDP should not include a spatial framework. **SportScotland** supports Option 23a and request that the impact of wind farms on sport and recreation should be a consideration.

The **National Park Authority** agrees with preferred Option 23a. Renewable energy development s in West Dunbartonshire could have significant impacts on the National Park and a criteria-based approach would allow for proper assessment. **SPT** states that the location of turbines should not adversely affect the operations of Glasgow Airport.

Dumbarton East & Central Community Council supports Option 23b and the need to protect areas that would be unsuitable for wind farm development. **Silverton & Overtoun Community Council** supports Option 23a and agree that

individual planning applications for wind energy should be assessed on individual merit rather than a blanket prohibition on Green Belt.

Clydebelt supports Option 23b, and comments that no other forms of renewable energy are referred to. The **Mountaineering Council of Scotland** supports Option 23a and state it would not be in accordance with the SDP to identify search areas for greater than 20MW wind farms and there is no requirement to identify areas for lesser than 20MW. The **RSPB** supports the inclusion of a spatial framework to direct smaller wind energy developments.

Glasgow Airport Ltd requests that any policy should include criteria relating to impact on airport operations. **Lomond Energy** supports Option 23a, that a criteria based policy be applied to all forms of renewable energy. **Peel Environmental Ltd** supports a criteria-based policy to be extended to cover all forms of renewable energy, with the greatest opportunity for renewable energy in West Dunbartonshire appearing to come from waste and other biomass.

An individual supports Option 23a, and agrees that planning applications should be assessed on own merit rather than a blanket prohibition over the Green Belt.

Issue 24 – Reducing greenhouse gas emissions from new buildings

What target should the Local Development Plan set for the reduction of greenhouse gas emissions in new buildings?

Option 24a (preferred) - The Local Development Plan will require the inclusion of low and zero carbon technology within new buildings and reinforce the Building Standards Regulations target emission rate.

Option 24b - The Local Development Plan will require the inclusion of low and zero carbon technology within new buildings and that greenhouse gas emissions will be a minimum of 5% less than the target emission rate established by Building Standards Regulations.

The **Scottish Government** expresses disappointment that the Authority does not want to set a reduction target for greenhouse gases in excess of Building Standards targets. **SEPA** agrees with the preferred option of reinforcing Building Standards targets.

Dumbarton East & Central Community Council supports Option 24b and consider it appropriate the LDP requirements should exceed Building Standards. **Silverton & Overtoun Community Council** supports Option 24a.

The **RSPB** supports Option 24b because it is more challenging.

Clydeside Regeneration/Dawn Developments supports Option 24a. **Homes for Scotland** state it is wrong for the Council to require micro-renewables in new development as target emission rates can be achieved without them. **Lomond Energy** supports the requirement for an inclusion of low and zero carbon technology in new development.

An individual supports Option 24b.

Issue 25 – Flooding

What are your views in relation matters concerning flooding within West Dunbartonshire? You may want to identify areas you consider to be at risk of flooding including sites referred to in other Issues, and/or suggest potential solutions to flooding problems, both physical interventions and changes in behaviour. Suggestions will help inform the approach taken to flooding in the Proposed Local Development Plan and the future local flood risk management plan.

The Scottish Government is encouraged that flooding is addressed in the Main Issues Report. **Scottish Water** requires new developments to collect surface water on an entirely separate system. **SEPA** sets out issues it wishes to see covered in any flooding policy. **SNH** states that climate change should be a key consideration in selecting development sites, and that enhancing habitats and landscape can contribute to climate change adaptation and water management. Land should be reserved for accommodating rising sea levels – the Bowling extension area may provide a unique opportunity for this in West Dunbartonshire. **Scottish Canals** highlights that canals can play a role in alleviating flooding, and the Lomond Link has been designed to do so.

Dumbarton East & Central Community Council seeks for all new homes to have SUDS, all drainage systems and water courses to be regularly inspected, an adequate flood warning system and flood prevention advice for residents. **Silverton & Overtoun Community Council** seeks that no more planning permission should be given for large developments on areas deemed to be at risk from flooding; that the Gruggies Burn flood management scheme should be implemented to reduce flooding in Dumbarton East; and that paving or mono-blocking front gardens should require planning permission. **Our Holy Redeemer & St Margaret's parishes** refer to flooding that occurs in the vicinity of the Low Crescent roundabout in Whitecrook and hope that this can be addressed.

The **RSPB** states there is no justification for West Dunbartonshire adopting an alternative approach to the presumption against new development in high risk areas. It wants a presumption in favour of sustainable flood management methods. The LDP should protect inter-tidal areas from rising sea levels or compensate for their loss.

Clydeside Regeneration/Dawn Developments states that flooding issues will be taken into account in developing Queens Quay. **Tarmac** states that the sites at Dumbuckhill are not constrained by flooding.

An individual states that no more planning permission should be given for large developments on areas deemed to be at risk from flooding; that the Gruggies Burn flood management scheme should be implemented to reduce flooding in Dumbarton East; and that paving or mono-blocking front gardens should require planning permission.

Issue 26 – Fastlink

What approach should the Local Development Plan take towards Fastlink?

Option 26a (preferred) - The Plan should support the implementation of Fastlink within West Dunbartonshire to serve the Clydebank town centre and/or the Clydebank Riverside area. Where the route runs through development sites the necessary infrastructure should be provided by the developer.

Option 26b - The Plan should not reserve the Fastlink route nor require its provision in development sites.

SEPA acknowledges the possible impacts/benefits of Fastlink in respect of air quality. **SNH** agrees with the principle of Fastlink within West Dunbartonshire but recommends that the LDP ensures that long term impacts on the green network are avoided

Clydebank Rebuilt agrees with Option 26a, but urge caution with policy wording to ensure that developments do not become non-viable due to over onerous requirements to provide infrastructure for Fastlink. **SPT** fully supports Option 23a and will provide more certainty about the scheme in West Dunbartonshire as soon as possible to inform the LDP.

Parkhall North Kilbowie & Central Community Council does not consider Fastlink to be a suitable sustainable transport solution and suggest that existing rail track adjacent South Street should be utilised for a light rail system instead. **Silverton & Overtoun Community Council** supports Option 26a but urges the extension of the service into Dumbarton and the Vale of Leven.

Glasgow City Council and **Renfrewshire Council** support Option 26a.

Clydeside Regeneration/Dawn Developments support Option 26b due to project uncertainties and inappropriate burdens that Option 26a may place on developers.

An individual supports Option 26a but urges the extension of this service into Dumbarton and the Vale of Leven.

Issue 27 – Kilbowie Roundabout

What solution should the Local Development Plan promote for Kilbowie Roundabout?

Option 27a (preferred) - Kilbowie Roundabout should be reconfigured by:

- The stopping-up of the existing B814 Duntocher Road connection to the roundabout and the creation of a new signalised junction onto the A82 approximately 120 metres westwards; and*
- Enabling the flow of east-west/west-east traffic through the roundabout (hamburger roundabout solution).*

Option 27b

Only traffic management changes should be made e.g. the resequencing of traffic lights, with no physical intervention.

SEPA acknowledge the possible impact/benefits in respect of air quality.

SPT support the preferred option and the safeguarding for the proposals in the Proposed Plan.

Dumbarton East & Central Community Council support Option 27a.

Clydebelt expresses concern about Option 27a increasing accidents and asks if the ultimate answer is a fly-over.

One individual suggests a flyover. Another suggests because there is no money to build a fly-over things should be left as they are.

There was no specific support for Option 27a on **Facebook/Twitter**. Other improvements were suggested including a flyover and removing the existing traffic lights.

Issue 28 - Developer Contributions

Should the Local Development Plan introduce a requirement for Developer Contributions?

Option 28a (preferred) - Contributions shall only be sought in relation to open space requirements, transport infrastructure improvements essential to facilitate the development and employment-related community benefits.

Option 28b - In addition to the requirements set out in 28a, contributions will be sought from developers towards further infrastructure requirements, with details of what type of developments contributions will be sought from and towards which infrastructure requirements to be identified in future Supplementary Guidance.

The **Scottish Government** is wary of the proposals to extend developer contributions to cover creating local employment opportunities, and query the legality of this. **Scottish Water** state that developers are responsible for meeting the costs of all local network infrastructure and that additional capacity will be provided by Scottish Water under certain conditions. **SNH** support the principle of Option 28a, but recommend its coverage is extended to include contributions to the green network. **SportScotland** supports Option 28a insofar as it relates to open space requirements, but highlight that new development can also create additional demand for indoor sports facilities, so capacity of existing facilities should be examined.

Clydebank Rebuilt supports the principle of developer contributions to support wider community benefit, but states that care must be taken not to discourage development. **SPT** requests that developer contributions towards transport infrastructure improvements are not limited to physical roads infrastructure but also to public transport facilities.

Dumbarton East & Central Community Council and **Silverton & Overtoun Community Councils** both support Option 28a.

The **RSPB** supports Option 28a but considers biodiversity improvements to be an essential part of development.

Clydeside Regeneration/Dawn Developments and **Wm Morrison Supermarkets** agree in principle with Option 28a.

One individual supports Option 28a.

Issue 29 – Dumbarton Football Club

Should the Local Development Plan identify a site for a new stadium for Dumbarton Football Club along with associated infrastructure and other uses to help fund the stadium?

Option 29a - The Plan should identify Esso Bowling as an appropriate location for a new stadium with enabling mixed-uses.

Option 29b - The Plan should identify Dumbuck as an appropriate location for a new stadium with enabling mixed-uses.

Option 29c - The Plan should identify Young's Farm, Dalreoch as an appropriate location for a new stadium with enabling mixed-uses.

Option 29d - None of the suggested sites are suitable for a new football stadium and enabling development.

The **Scottish Government** supports the plan-led approach to identifying a new stadium site and emphasises the vital social function of local football clubs and local economic spin-off of match day events to small businesses. **SEPA** writes that all three sites considered are to some extent impacted by flood risk and would require additional studies to be completed to fully characterise the constraint on possible development footprints. **SEPA** would object in principle to any greenfield allocation or development within the fluvial functional floodplain of the River Leven. **SNH** does not consider the current location of the stadium to be appropriate. **SportScotland** is supportive of the club seeking to improve its facilities.

SPT have provided accessibility information about the alternative sites and ask that the Council sets good accessibility by public transport as a key criterion in selecting the preferred site.

Comments on each of the Options were as follows:

Esso Bowling – **SNH** has concerns with regard to the impact of development on the Inner Clyde Special Protection Area. The **RSPB** support this option. **Bowling & Milton** and **Silverton & Overtoun Community Councils** and an individual object to this option. **Dumbarton East & Central Community Council** identifies this site as the one with the least potential traffic problems of the three suggested.

Dumbuck - **SNH** support Option 29b (Dumbuck). **Dumbarton East & Central Community Council** strongly object to this site due to the 'certain traffic congestion that would result'. **RSPB** have reservations about the development of

the site because of the potential for disturbance, including light pollution to the Special Protection Area.

Youngs Farm - **Dumbarton FC** support Option 29c (Young's Farm) and request the site is allocated for the development of a community sports hub incorporating a new stadium and associated enabling development. **SNH** comments that if the development was located on the west side of the site, potential impacts on biodiversity and flooding might be greatly reduced. The **RSBP** observes that this option would represent a significant green belt release and mean further development of the natural floodplain.

Dumbarton East & Central and **Silverton & Overtoun Community Councils** and an individual do not agree that any of the suggested sites are suitable and thus support Option 29d.

Comments on **Facebook/Twitter** were balanced between querying why a new stadium was needed and asking why Clydebank FC were not getting a new stadium.

Issue 30 – Development Sites

Site 001: Antartex - The **Edinburgh Woollen Mill** supports its designation as a Commercial Centre and wish to see this carried forward to Proposed Plan stage.

Site 016: Former Cottage Hospital, Dumbarton - **NHS Greater Glasgow and Clyde Valley** supports the inclusion of this site as a residential opportunity.

Site 028 – Cochno Farm – **Clydebelt** states that any development should be minimal and not develop into a science park.

Site 030 – Great Western Road – **Historic Scotland** does not support the extension of this site, owing to the proximity of the Antonine Wall. **Clydebelt** states that the further expansion of this site should be refused and the green belt protected.

Site 039 – Bowling Basins – **Clydebelt** states that Bowling requires sensitive development appropriate to its situation, architecture and history. **Scottish Canals** comments that it may not be possible to deliver all the suggested uses or that other uses may become viable and desirable.

Site 041 Scott's Yard – an individual objects to this being identified as a Key Regeneration Site.

Site 042 – Queens Quay - Clydeside Regeneration/Dawn Developments suggests that the opportunity should be further identified with a supermarket opportunity added to its proposed uses.

Sites 048, 050 & 051: former St Andrews High School, Braidfield High School & St Eunans Primary School – Clydebank Rebuilt supports the proposed uses (residential) for these key development sites.

Site 049: Clydebank College – Clydebank Rebuilt supports the potential of this site to provide a local community facilities hub in conjunction with residential provision.

Site 065: Levenbank Road, Jamestown – Balloch & Haldane Community Council considers the propose change (from open space to residential) would be controversial and resisted by Levanbank residents. Further consultation recommended.

Site 071: Lomond Galleries - Hermiston Securities Ltd would like the Commercial Centre to retain its retail development opportunity status reflecting the current planning permission.

Site 080: Dunclutha, Clydebank – Parkhall North Kilbowie & Central Community Council supports the use of the site for residential development, with a 2 house development preferred.

Site 097: St James Retail Park - Dumbarton East & Central Community Council objects to the change to Commercial Centre from Retail Development Opportunity, contesting that it should instead be included within the town centre and its existing retail planning permission identified. Similarly **Silverton & Overtoun Community Council** and an individual do not support St James Retail Park being a Commercial Centre and would like it to remain as a retail development opportunity. The **British Land Company** would like land to the east of St James Retail Park continue to be identified as a retail development opportunity in line with its existing permission.

Site 130: Rothesay Dock, Clydebank – Peel Environmental Ltd supports the retention of the site as a business and industrial location and considers that the Proposed Plan should explicitly state uses 'similar' to Classes 4, 5 and 6 will be acceptable, e.g. a waste treatment facility.

Site 138: Crosslet House, Dumbarton - Silverton & Overtoun Community Council states that this site should be redesignated as an Open Space/Environmental Improvement Opportunity due to its existing use for recreation, tree cover and wildlife value. Access to A82 would be problematic, despite reduced capacity. An individual also supports this.

Site 143: Townend Road, Dumbarton – Silverton & Overtoun Community Council and an individual requests that the site redesignated as open space, specifically as an allotment.

Sportscotland refers to the need to replace sports pitches where these may be lost through redevelopment.

Additional Issues

Air Quality – **SEPA** hopes to see air quality management strategically linked into the environmental considerations of the Local Development Plan.

Built Heritage – The **Scottish Government** states that many of the proposed development sites have potential for direct or indirect impacts on heritage assets. For the majority of sites, robust application of national and appropriate local policies should be able to mitigate any adverse impacts. Early engagement with **Historic Scotland** on proposals which raise complex or significant issues is key to avoiding adverse impacts and optimising positive outcomes for the historic environment.

Clydebelt notes there is no mention of conservation areas. An individual considers the built heritage of West Dunbartonshire to have been ignored in the MIR. This representation was accompanied by a significant submission on West Dunbartonshire's built heritage.

Canals – **Scottish Canals** state that canals offer the opportunity to become corridors of sustainable development through use for SUDS, green energy and providing heating and cooling solutions.

Climate Change – The **RSPB** points out that Local Authorities have a particularly important role to play in tackling climate change. **Lomond Energy** states that Scotland has a role to play in addressing climate change, and that utilising wind energy resource is an opportunity to reduce carbon emissions and that the Local Development Plan should address all forms of renewable energy including policies on the provision of on-site renewable energy in new developments.

Coal/Minerals – The **Scottish Government** states that there is no mention of landbanks for minerals in the MIR and that there is a Scottish Planning Policy requirement for a landbank of reserves for construction aggregates for a minimum of ten years. The **Coal Authority** states that coal reserves in the area should be safeguarded and previous coal workings may have left some areas unstable.

Ecology – **SEPA** seeks protection of nature conservation interests and green networks and states that plans to avoid culverting watercourses as part of new developments and to open up existing culverts where possible are welcomed.

Glasgow Airport – **Glasgow Airport Ltd** comments that Glasgow Airport is a key asset for West Dunbartonshire and the LDP should consider how to optimise and enhance this role. It further states that uses which attract birds represent an issue in relation to the airport and flightpaths and that the LDP should not promote noise sensitive uses within areas affected by airport noise. Renfrewshire Council supports the proposed clarification of the Council's policy on aircraft noise and Glasgow Airport's safeguarding zone.

Housing – The **Scottish Government** states that the Proposed Plan should show more information on housing numbers and include proposals for client groups where the Housing Need and Demand Assessment identifies need and demand, eg for older people. Scottish Planning Policy requires a demonstrable policy on Houses in Multiple Ownership. **McCarthy & Stone Retirement Lifestyles Ltd** suggests that a policy be introduced to positively support the delivery of specialised accommodation for older people.

Infrastructure – The **Scottish Government** states that developing mechanisms to ensure that supporting infrastructure is funded and developed will be critical.

Peatlands – The **RSPB** states that the LDP should contain a policy reflecting how peatlands should be protected and restored.

Regeneration – **Clydebank Rebuilt** welcomes the emphasis on social and economic regeneration as a strategic priority.

River access – **Glasgow City Council** would support a strategic river bus service with water access points and havens being safeguarded and completion of a coastal walk/cycle route along the Clyde waterfront.

Telecommunications – The **Mobile Operators Association** states that it is important that there is a telecommunications policy within the emerging Local Development Plan.

Town Centres – The **Scottish Government** suggest that the Proposed Plan includes an aspiration to secure better placemaking by design at the town centre scale, backed up with proposed action(s) on how this aspiration would be delivered. This could be done by tying public realm improvements with the principles in the quality-based documents of Designing Places and Designing Streets.

Transport Infrastructure – The **Scottish Government** states that the requirement for the Proposed Plan to identify new transport infrastructure extends to cycle and pedestrian routes, thus the Proposed Plan should identify if there are particular priority routes or areas where the cycle network is to be developed. **Glasgow City Council** would like the North Clydeside Route included in the

Proposed Plan and would welcome further discussion on this topic. **Network Rail** draws attention to the implications of development affecting level crossings.

Waste – The **Scottish Government** notes that there is little in the MIR about waste management and it is therefore assumed the Council is not considering further sites for waste infrastructure and that the Council may wish to increase its industrial land allocation to provide sufficient capacity for waste infrastructure. **SEPA** expects the LDP to address waste management and sustainable resource use including safeguarding existing and identifying new sites for waste management.

Water environment – **SEPA** states that land use planning has a key role in ensuring the protection and improvement of the water environment and that the objectives of river basin management planning and green networks are linked. The Proposed Plan should highlight requirements of the Water Framework Directive (WFD), river basin planning and the role of the council as a responsible authority under this legislation. Invasive non-native species are recognised as a significant risk to the water environment.

General Comments

Format – The **Scottish Government** states that the place base approach of the MIR is to be commended. It expects that the Proposed Plan will be concise and map-based with detail included in Supplementary Guidance. The Proposed Plan should promote urbanism and a 'sense of place'. 'Homes for the 21st Century', 'Designing Places' and 'Designing Streets' should all be considered. Design standards and guidance are welcomed. It should take account of a number of strategies published since the current Local Plan was prepared. **Balloch & Haldane Community Council** believes the Plan should include a section jointly presenting National Park and Council aspirations for Balloch. This would ensure there are no conflicts in aspirations and that there is an integrated plan. The Plan should consider 'cross-border' issues such as provision of industrial uses to serve Balloch within West Dunbartonshire plan area, or improving access to features within each area.

Enterprise – **Scottish Enterprise** has not identified any issues of concern or missed opportunities.

Redevelopment plans – An individual would like to see plans come to fruition, referring specifically to Dumbarton Waterfront and Town Centre.

Strategic Environmental Assessment

The MIR has been subject to Strategic Environmental Assessment (SEA). The consultation authorities (Historic Scotland, SEPA and SNH) have provided advice on the assessment process and results. In general terms, the consultation authorities found the SEA's Environmental Report to be comprehensive, clear and concise. Some concern was expressed that the report does not offer more detail on the mitigation of environmental effects. This will be addressed as the Environmental Report is revised alongside the preparation of the Proposed Plan.