

ITEM 7 - Appendix 6

Green Network and Green Infrastructure – comments received on draft version and Council’s proposed response

| Respondent | Comment | WDC response |
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| The Coal Authority | <p>Our records indicate that within the West Dunbartonshire area there are recorded coal mining features present at surface and shallow depth including; mine entries, shallow coal workings and reported surface hazards. These features pose a potential risk to surface stability and public safety.</p> <p>The Coal Authority’s records also indicate that surface coal resource is present on the site, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.</p> <p>It is noted however that this is a draft SPG on Green Network and Green Infrastructure and I can confirm that the Planning team at the Coal Authority have no specific comments to make on this documents.</p> | It is noted that the Coal Authority has no specific comments on this document. |
| | It may however be worth noting that if SUDs are proposed as part of developments green infrastructure consideration will need to be given by | These comments, about the design and development process of SUDs, are more relevant to the Creating Places Supplementary Guidance and the respondent |

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| | <p>the developer to the implications of this in relation to the stability and public safety risks posed by coal mining legacy. The developer should seek their own advice from a technically competent person to ensure that a proper assessment has been made of the potential interaction between hydrology, the proposed drainage system and ground stability, including the implications this may have for any mine workings which may be present beneath the site.</p> | <p>has agreed they may be addressed in relation to the consultation on that draft supplementary guidance.</p> |
| <p>Glasgow & Clyde Valley Green Network Partnership</p> | <p>Generally the SG is very good, clear, concise and focusses on the things we'd want to see delivered through development.</p> | <p>This support is welcomed.</p> |
| | <p>Page 4: Suggest this text here and in the graphic below is changed: Under Greenspace substitute for: “is any vegetated land or structure, water, path or geological feature within and on the edges of settlements.” Under Green Infrastructure substitute for: “is greenspace which is designed and/or managed to provide identified functions.”</p> | <p>Agreed, Figure 1 has been changed to reflect these comments.</p> |
| | <p>Page 5: Request for wording in the ‘Planning and the green network and green infrastructure’ section to be strengthened</p> | <p>Agreed, the phrase “where possible” has been deleted, which brings the text in the supplementary guidance in to line with the strategy as written in the LDP2.</p> |
| | <p>Page 7: Suggested alternative wording in the ‘Embedding the green network and green infrastructure’ section: add “providing an overall net gain in provision” to first bullet point; and add “which have designed functions for a range of users” to 4th bullet point.</p> | <p>Agreed, these changes have been made, with a qualification that net gain can be either qualitative or quantitative (Page 8).</p> |

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| | Page 8: In Green infrastructure function: habitat enhancement section, use the term 'nature networks' in line with the draft NPF requirements? | Agreed, the wording has been changed to 'nature networks'. |
| | Page 11: Incidental greenspace and landscaping will not count towards the quantity standard. Developers should provide a site plan indicating which spaces comprise provision | Agreed, this wording has been added. |
| | Page 19 – Appendix 2: Only some of the relevant LDP policies are cross-referenced in the graphic | Noted, the graphic has been updated with all policy cross-references. |
| Historic Environment Scotland | The drafts for our historic environment interests have been considered, and can confirm that we have no comments on their content. | It is noted that Historic Environment Scotland has no specific comments on this document. |
| Homes for Scotland | <p>Introduction</p> <p>Homes for Scotland (HFS) welcomes the opportunity to comment on West Dunbartonshire's Draft Supplementary Guidance (SG) in relation to Green Network and Green Infrastructure.</p> <p>This submission sets out our representations in relation to the published draft SG. Firstly though, there are some general matters of concern to HFS.</p> | Noted |
| | <p>General Concerns</p> <p>It is stated within this Guidance that will be adopted as statutory supplementary guidance, forming part of Local Development Plan 2 (LDP2). Given LDP2 has not yet been adopted, and therefore its final form is not currently known, it is problematic to be publishing SG to support this. It is not even known whether LDP2 will in fact ever be adopted.</p> | <p>General Concerns</p> <p>The status of the Supplementary Guidance has been clarified at the front of the document. The guidance is intended to be adopted as supplementary guidance to the Local Development Plan (LDP2) and provides further detailed guidance on the content thereof, it is therefore not premature in relation to the emerging National Planning Framework or Development Planning Regulations, as the LDP has been prepared</p> |

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| <p>LDP2 does not currently form part of the Development Plan, as it remains unadopted. Therefore, the lower tier of the Development Plan in West Dunbartonshire is the West Dunbartonshire Local Plan (WDLP), adopted in March 2010. The status of this Plan has been significantly eroded, as it is now over 7 years out of date.</p> <p>The draft SG has also been released just ahead of the anticipated new Development Management Regulations and National Planning Framework 4 (NPF4). For these reasons it could be argued that the revision and delivery of new SG is premature.</p> <p>As noted above, it is stated that the Council intends to adopt the proposed new SG as part of the statutory Development Plan. However, this statutory status might only last for a limited period as all such guidance will at some point have to be non-statutory under the soon to be published new Regulations and NPF4. While it is acknowledged that Scottish Ministers have made provision for a 24 month 'transitional period' following publication of the new Regulations, the draft new SG could end up being part of the adopted development plan for a limited period after which the council will require to undertake a further revision to reflect the non-statutory status thereafter.</p> <p>As we don't yet know what the new Regulations will look like and how the transitional period will be implemented, HFS is of the view that the Council</p> | <p>and will be adopted based on the current Scottish Planning Policy, and the current Development Planning Regulations and in line with transitional arrangements.</p> <p>The guidance on transitional arrangements indicates that Planning Authorities will require to decide if the content of Supplementary Guidance should move to planning guidance or be included within local development plan itself. However the guidance also indicates that new supplementary guidance can be prepared and adopted until Section 22 of the 1997 Act is repealed and for a further 24 month period thereafter.</p> |
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| | <p>should consider moving straight to publication of non-statutory SGs as other Local Authorities, including South Lanarkshire Council, have done.</p> | |
| | <p>Regardless, the draft Guidance, in places, appears to go beyond merely supplementing policies within the LDP but rather looks to introduce new and more onerous requirements for developments to meet. This is not an appropriate use of SG as the principles of policy have not been properly scrutinised or tested as part of the LDP examination.</p> <p>Planning Circular 6/2013 (Development Planning) notes that Regulation 27 (2) of The Town and Country Planning (Development Planning) (Scotland) Regulations 2008 requires SG to be limited to the provision of further information or detail in respect of policies or proposals set out in the SDP or LDP. There must be a sufficient “hook” in the SDP or LDP policies or proposals to hang the SG on, to give it statutory weight.</p> <p>This matter was reinforced by a letter sent to All Heads of Planning on 15 January 2015 by The Chief Planner, which states:</p> <p>“For supplementary guidance to be issued in connection with a local development plan, this means that the guidance may only deal with the provision of further information or detail in respect of policies or proposals set out in the local development plan and then only provided those are matters which are expressly identified in a statement contained in the</p> | <p>The Council considers that LDP2 provides sufficient ‘hooks’ for the Green Network and Green Infrastructure Supplementary Guidance. The Supplementary Guidance is referenced 16 times in LDP2, in various sections of the Plan, in both policies and explanatory text, reflective of the Plan’s green infrastructure first approach. The Supplementary Guidance serves the purpose of providing further information or detail in respect of policies set out in LDP2.</p> |

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| | <p>plan as matters which are to be dealt with in supplementary guidance.”</p> <p>We believe specific sections of the draft SG breach these requirements, as detailed below.</p> <p>Any mechanism which may seek to restrict the deliverability of new homes to meet the housing crisis which prevails in Scotland must be resisted. As we move towards the new system under NPF4, the threshold for what constitutes a “deliverable” site is greater than previously existed, and it is against this backdrop that all policies/strategies must now sit. Affecting the deliverability of sites through the introduction and requirement of a range of additional asks must be seriously considered.</p> | <p>The Scottish Government have indicated in the draft NPF4 that the Climate and Nature Crises should be given the highest priority when considering planning issues. While it is acknowledged that the final NPF has yet to be published, the Planning Authority recognises that the Climate Crisis, Nature Crisis and any housing crisis are all part of the range of issues which are considered when preparing policy and guidance and it sits with the Planning Authority to afford appropriate weight to these and all other relevant considerations.</p> |
| | <p>Green Infrastructure Delivery in New Development</p> <p>The draft Guidance refers to situations where a developer contribution towards off-site improvements may be sought. Whilst the principle of this is supported there should be reference to hybrid scenarios where a combination of off and on-site provision/improvements may be appropriate.</p> | <p>It is agreed that a hybrid approach may be acceptable where on-site provision cannot be met in full, as indicated by the Developer’s Flowchart, Appendix 1 and Appendix 3, examples 4 and 5. Further clarification of this has been added to the guidance (page 15). However the requirement, and preference, for on-site provision with a limited number of exceptions is retained.</p> |
| | <p>Biodiversity Enhancement</p> | <p>Biodiversity Enhancement</p> |

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| | <p>While HFS does not object to the principle of 'biodiversity enhancement', there is currently insufficient information as to precisely what this will mean in practice. Draft NPF4 indicates that Scottish Ministers are still considering this themselves and it therefore appears likely that there will be further national guidance on the matter in the final version of NPF4. It is therefore premature to implement this requirement for new planning applications.</p> | <p>Policy CP2e requires Habitat Enhancement, and indicates that, "Development proposals must protect, restore and enhance biodiversity habitat networks, and environmental quality within and linking to the site. Opportunities for improving the conservation status of priority species and the inclusion of ecological features within the built environment should be considered" This policy is within the plan and has been through examination. It is therefore disagreed that it is premature to provide further detail on this policy. No change required.</p> |
| | <p>Open Space – Establishing Need and Opportunity Table 1 outlines that Open Space provision may be required for proposals of 10 or more units, in situations where "need/opportunity identified". Further clarification is required here. How is need and opportunity to be assessed? What specific assessment processes are in place which would trigger the requirement for Open Space? There is a lack of information here, which risks causing uncertainty, and subsequently viability concerns.</p> <p>It is also worth noting that this ambiguous phrasing also pertains to the potential requirement to deliver Access Networks, Water Management and Habitat Networks.</p> | <p>Appendix 1 of the Supplementary Guidance sets out a flow chart which provides a guide to the expectations for the provision of open space. The guidance also states that "The green network requirements for each individual site will be discussed and agreed at pre-application stage."</p> <p>Policy CP2 Green Infrastructure and the Supplementary Guidance set out a green infrastructure first approach to the provision of access networks; open space; water management; and habitat enhancement so as to contribute to the development and enhancement of a multi-functional green network. The policy and guidance indicate that this is best achieved through a design led approach from the outset. Further guidance on how these functions can be layered together to provide multiple benefits for "health, wellbeing, wildlife, as well as, climate change mitigation and adaptation" are given in the Creating Places Supplementary Guidance. No change is required in this regard.</p> |

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| | <p>Open Space Requirements The draft SG states: “All new housing developments should provide access to 30m² of publicly useable open space per person.”</p> <p>The Council’s most recent update to the Open Space Audit was in 2018 and is therefore four years old. It is not clear, therefore, how the Council has reached the conclusion that the above volume of Open Space is required to be provided. It is also recommended that the Council aligns its Open Space requirements with many other Local Authorities’ approaches, including East Lothian Council, by amending the requirement to be provided on a per dwelling basis, rather than per person, given the number of dwellings will be known (and constant), whereas the number of people will not.</p> <p>Based on the 2011 Census the average household occupancy within West Dunbartonshire is 2.15 people per household. This data should be used to calculate the Open Space requirement and potential contribution rather than extrapolated data based on the Scottish Household Survey. The Census data is an accurate snapshot in time.</p> | <p>The 30m² per person requirement is established by the Local Development Plan (LDP2), which has been through examination.</p> <p>The Council considers that basing the open space calculation on the average household size of different dwelling sizes provides a more accurate open space requirement than using a single average household size figure. This approach has been used by the Council since 2015 so is a well established approach in West Dunbartonshire.</p> <p>No change is required in this regard.</p> |
| | <p>The draft Guidance seeks to assess proposals against three key standards – accessibility, quality and quantity. The quality element of this is based on the Council’s updated Open Space Audit (2018) and</p> | <p>The Council has now made the scores of its Open Space Audit available online https://westdunbarton.maps.arcgis.com/apps/webapviewer/index.html?id=fe102759a63e4dfbb5251b214</p> |

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| | <p>the guidance notes that a contribution will be required to upgrade off-site infrastructure where it is below a threshold score. The Open Space Audit is not public and the scores are therefore not available. HFS is concerned that without sharing the evidence, there is a risk that the Council are not complying with the tests set out in Planning Circular 3/2012 if there is not full disclosure when sums are being suggested.</p> <p>It is also understood that under the requirements of the Planning (Scotland) Act 2019 that an Open Space Strategy must contain an audit of existing Open Space provision and an assessment of current and future requirements. East Ayrshire have produced Green Infrastructure/Open Space Standards Supplementary Guidance which scores open space within settlements. A further Council and East Ayrshire Leisure publication titled Green Infrastructure and Green Network Strategy Volume 2 then provides a more detailed qualitative assessment and lists specific upgrades that are required to specific parks.</p> <p>The general direction the Scottish Government appear to be heading is the prioritisation of brownfield land. As such, there will likely be a much higher dependency on brownfield and higher density development. This being the case, it is likely true that there will be insufficient land to meet the housing need if Open Space requirements are not sufficiently flexible, and evidence of their requirement is extremely robust. The rigidity of Open Space requirements and their potential to hinder brownfield</p> | <p>00f058a) and an information note has been added as an appendix to the Supplementary Guidance. An updated audit will be undertaken as part of the next Local Development Plan (LDP3) process.</p> <p>The Local Development Plan (LDP2) and this Supplementary Guidance were prepared under the provisions of the Planning (Scotland) Act 2006. The approaches taken by other local authorities are not binding on West Dunbartonshire Council, but the Council will continue to investigate and be informed by best/good practice elsewhere.</p> <p>West Dunbartonshire Council have always prioritised the development of brownfield land and encourage higher density in urban locations. It is considered important for provision and consistency that open space standards are set. The Supplementary Guidance provides flexibility in allowing a financial contribution towards the green network to be provided if sufficient provision cannot be made on site.</p> |
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| | <p>development from delivering the volume of homes NPF4 says is required needs to be reviewed. It is also important to note that brownfield-only development is unlikely to deliver the volume of homes required, as well as the Open Space requirements being sought.</p> | |
| | <p>General Developer Contributions The draft SG states: “The Council will publish a schedule of general and specific projects that developer contributions will be used towards. This will be updated annually.”</p> <p>This raises significant concerns, and risks affecting the viability of sites. The presumption appears to be that developer contributions may not be ring-fenced to deal with impact of a specific development. This point requires clarification.</p> <p>Any amendment to the contributions required with regards to Open Space must be informed by an Open Space Audit.</p> <p>It is suggested that a joined-up assessment of housing need and Open Space requirement be undertaken, which would lead to the Council to identifying what is needed and where, and, accordingly, would necessitate a review of the allocated land.</p> <p>As noted above, any mechanism which would seek to restrict the supply of deliverable land should be resisted. It is vital that the housing crisis is addressed,</p> | <p>West Dunbartonshire Council Planning Committee, approved the process to report and allocate developer contributions received through the planning system on 8 June 2022. These are available to view at https://www.west-dunbarton.gov.uk/council/strategies-plans-and-policies/local-development-planning/other-guidance-and-information/</p> <p>The allocations document sets out that developer contributions received will be allocated based on: proximity to the site the allocation has been received from; deliverability of the project; and eligible project types, with some specific projects identified. Through these criteria, the Council can link projects to deal with the impact of a specific development.</p> <p>Changes to the allocation of land would be a matter for the next Local Development Plan,</p> |

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| | <p>and that placemaking policies are suitably adaptable to factor in viability matters.</p> <p>Retention Period for Funds The draft SG seeks a 10-year time period for the retention of funds.</p> <p>HFS objects to this proposed provision on the basis that a period of 10+ years is excessive. If a contribution can't be spent within a shorter timescale (e.g., 5 years), then it is questionable whether it was appropriate in the first place and if it meets the requirements of Planning Circular 3/2012.</p> | <p>It is considered that this retention period is reasonable considering development timelines for housing sites or the subsequent delivery of associated green infrastructure projects. Planning Circular 3/2012 does not specify a reasonable timeframe, it therefore sits with the planning authority to fix one that is reasonable. It is agreed that projects, associated with a given development, should delivered before this trigger is met.</p> |
| NatureScot | <p>Overall support this Guidance and appreciate West Dunbartonshire's continued commitment to green networks and green infrastructure. In particular, support the strategy of Local Development Plan 2 which underpins the guidance and which 'seeks to safeguard the existing green network, and to ensure new development enhances and expands it by improving existing green infrastructure assets, the connections between them and by creating new multi-functional green and open spaces' (page 4). We commend you on being awarded the 'Building for Nature Award' for LDP2, recognising the whole lifecycle approach to green infrastructure from design, construction to sustainable management.</p> <p>They also support the identified purpose of the Guidance as outlined on page 3 : 'to define the green network in West Dunbartonshire and identify its assets and opportunities; outline the principles for embedding the green network at the heart of new</p> | <p>This support is welcomed.</p> |

development using a green infrastructure first approach; define open space standards that will be required of new development and how these standards will be achieved; and describe how developer contributions for green infrastructure associated with new developments will be calculated.

They acknowledge the recognition given to the role of the planning system as a key mechanism for delivering the green network and the role of green network in delivering outcomes, particularly with regard to improving health and well-being, meeting climate change targets, placemaking and securing positive effects for biodiversity (page 5).

Part 2 – Green infrastructure delivery in new development

They support the requirements for development proposals set out on page 7, for safeguarding, enhancing and expanding the green network and green infrastructure. The requirements encompass enhancing the functionality and biodiversity value of existing assets, utilising the site appraisal and design process to identify opportunities to enhance the value of existing assets. They welcome the value attributed to existing assets and consider that this will also help deliver positive effects for biodiversity.

Green infrastructure functions (page 7)

Welcome the focus given to the integration of the green infrastructure functions of water management, habitat enhancement, access and open space within

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| | <p>the design and layout of development as part of the green infrastructure first approach, ensuring a whole life approach to green infrastructure provision and which also links and contributes to the wider green network.</p> <p>Overall, they consider the document to be clear and well presented, providing useful advice to developers, including the Developer’s Flowchart, the Green Infrastructure Checklist and Developer Contribution Example, contained in the appendices.</p> | |
| Persimmon Homes | The principle of setting out on and off-site requirements is welcomed. | This support is welcomed. |
| | Based on the 2011 Census the average household occupancy within West Dunbartonshire is 2.15 people per household. This data should be used to calculate the open space requirement and potential contribution rather than extrapolated data based on the Scottish Household Survey. The Census data is an accurate snapshot in time. | The open space standard per person, and ratio of household size to dwelling size is established in the Local Development Plan (LDP2), which has been through examination. The use of house sizes in specific developments rather than average household occupancy is considered to provide a more accurate open space requirement. No change is required in this regard. |
| | The draft guidance makes reference to situations where a developer contribution towards off-site improvements may be sought. Whilst the principle of this is supported there should be reference to hybrid scenarios where a combination of off and on-site provision/improvements may be appropriate. | It is agreed that a hybrid approach may be acceptable where on-site provision cannot be met in full, as indicated by the Developer’s Flowchart, Appendix 1; and Appendix 3, examples 5 and 5. Further clarification of this has been added to the guidance (page 15. However the requirement, and preference, for on-site provision with a limited number of exceptions is retained. |
| | The draft guidance seeks to assess proposals against three key standards – accessibility, quality and quantity. The quality element of this is based on the | The Council has now made the scores of its 2018 Open Space Audit available online (https://westdunbarton.maps.arcgis.com/apps/webap |

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| | <p>Council's Open Space Audit that was updated in 2018 and the guidance notes that a contribution will be required to upgrade off-site infrastructure where it is below a threshold score. The open space audit is not public and the scores are therefore not available. We are concerned that without sharing the evidence, there is a risk that the Council are not complying with the tests set out in Circular 3/2012 if there is not full disclosure when sums are being suggested. The scale and kind test is of most relevance. It is also understood that under the requirements of the Planning (Scotland) Act 2019 that an open space strategy must contain an audit of existing open space provision and an assessment of current and future requirements. East Ayrshire have produced Green Infrastructure/Open Space Standards supplementary guidance which scores open space within settlements. A further Council and East Ayrshire Leisure publication titled Green Infrastructure and Green Network Strategy Volume 2 then provides a more detailed qualitative assessment and lists specific upgrades that are required to specific parks.</p> | <p>pviewer/index.html?id=fe102759a63e4dfbb5251b21400f058a) and an information note has been added as an appendix to the Supplementary Guidance.</p> <p>The Local Development Plan (LDP2) and this Supplementary Guidance were prepared under the provisions of the Planning (Scotland) Act 2006. The approaches taken by other local authorities are not binding on West Dunbartonshire Council, but the Council will continue to investigate and be informed by best/good practice elsewhere.</p> |
| <p>Scottish Government</p> | <p>Scottish Planning Policy (SPP) states at paragraph 232: "In the design of green infrastructure, consideration should be given to the qualities of successful places." We suggest the SG should make reference to those qualities, which are set out in paragraphs 41-46 of SPP.</p> | <p>Agreed, reference to the six qualities of successful places has been added (page 5).</p> |

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| | <p>In part 4, it is stated that contributions for green infrastructure will be sought in line with the circumstances set out in Policy GI4 of the LDP, and lists those four circumstances.</p> <p>Two of those circumstances are:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Where a development site is accessible to open spaces but those spaces are of a poor quality; and <input type="checkbox"/> Where development sites are accessible to good quality open spaces but a contribution to the green network is required to enhance its provision to the Central Scotland Green Network. <p>It is not clear in the draft SG (particularly the flowchart in Appendix 1) whether developer contributions under Policy GI4 will/may be required in the above two circumstances even if the development includes sufficient open space (meeting the relevant quality and quantity standard) within the development site. The flowchart in Appendix 1 implies that such contributions would be required in such instances, but Example 1 in Appendix 3 does not. This should be clarified.</p> | <p>Footnotes have been added to the flowchart to clarify that: if a residential development meets the quantity standard through on-site provision, no financial contribution to the green network is required; and that an equipped play area is required on a site of 50 units or more, if there is not an equipped play area within 250m of the site (this highlights a requirement already included in Part 3 of the guidance).</p> |
| | <p>Page 10, 'Accessibility standard'</p> <p>It is stated that the accessibility standard is: "Everyone will live within a 250m walk of a 0.2 ha usable and good quality greenspace." If 'good quality'</p> | <p>Agreed, a change has been made to clarify this (page 12).</p> |

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| | <p>is intended to mean that the space meets the 'quality standard' i.e. meets or exceeds the threshold score set out in Table 2, this should be made clear.</p> | |
| | <p>Pages 10-11, 'Quality standard' The draft SG on pages 10-11 refers to a 'Quality standard', and states that the quality of an open space is an assessment-derived score based on work undertaken as part of the Open Space Audit carried out in 2016 and updated in 2018 to reflect changes to some spaces. It is stated that "The quality standard is: All publicly usable open spaces should meet or exceed the threshold score set out in Table 2". Table 2 includes different "Quality standard threshold scores" expressed as a percentage for different types of open spaces. However, it is not clear in the draft SG how to identify/calculate the score of existing or proposed open spaces, to determine whether they meet or exceed the threshold score set out in Table 2. This should be made clear.</p> | <p>The Council has now made the scores of its 2018 Open Space Audit available online (https://westdunbarton.maps.arcgis.com/apps/webappviewer/index.html?id=fe102759a63e4dfbb5251b21400f058a) and an information note has been added as an appendix to the Supplementary Guidance.</p> |
| | <p>Page 11 'Quantity standard' There is a formatting error on page 11 below the heading 'Quantity standard' – it is assumed that the text in the box should be below the text in the first paragraph.</p> | <p>This formatting error has been corrected.</p> |
| | <p>Page 11 'Quantity standard' It is stated that "Development sites should provide this quantity of open space [30 m2 per person] as a minimum where the accessibility standard identifies a</p> | <p>The quantity standard has been amended to clarify this point.</p> |

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| | <p>need based on an analysis of open space provision for the wider area".</p> <p>However this implies that the open space is always required to be provided within the development site, which seems to contradict the text in the box, which refers to "access to" the open space. It also seems to contradict the text under the heading 'Accessibility standard' which states that the site appraisal/ assessment will inform what type of space, if any is required within the development or if a financial contribution to an existing space is more appropriate. These apparent contradictions should be addressed.</p> | |
| | <p>Appendix 3: Developer contributions examples</p> <p>It would be useful to expand/revise the examples to show exactly how they follow the process shown in the flowchart in Appendix 1 (e.g. the application of the questions regarding the accessibility and quality standards).</p> | <p>A Developer's flowchart analysis has been added to each example.</p> |
| | <p>Appendix 3: Developer contributions examples – Example 1</p> <p>It would be useful to expand the first example to show how the 'site appraisal' method would be used to determine the form of open space required to be provided.</p> | <p>The purpose of Example 1 is primarily to provide a simple arithmetic example of calculating the open space contribution based on the quantity standard. However, additional information has been added to explain that the calculated level of open space would be required on-site in this example as the site is not within 250m walking distance of an usable open space.</p> |
| | <p>Appendix 3: Developer contributions examples – Example 3</p> | <p>This typo has been corrected to amend the reference to 250m.</p> |

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| | <p>The example refers to a financial contribution to upgrade play equipment in a park less than 400m walking distance. It is not clear whether/how this is considered acceptable in relation to the 'accessibility standard' which refers to a 250m walking distance. This should be clarified.</p> | |
| | <p>Appendix 3: Developer contributions examples – Example 6, and explanation of Quality standard on pages 10-11</p> <p>The example states that “the first step is to see if it meets the accessibility standard i.e. is it within 250m of a 0.2ha amenity greenspace, play space or natural/semi-natural greenspace?” (emphasis added). The example then refers to a “park” within 250m of the site. It states that “the play area is below the 50% threshold and requires investment”. However, the specified ‘Quality standard threshold score’ for ‘Parks and gardens’ in Table 2 is 69%. It is not clear whether/why there has to be a play space scoring over 50% within 250m of the development site, if the park scores at least 69%. This should be made clear. Adding an explanation as to how the scoring system works may help the reader to understand this.</p> | <p>The appraisal shows that a play area within walking distance of the site is below the quality threshold, meaning that it is a valid and eligible project for developer contribution funding. Additional wording has been added to provide clarification.</p> |
| | <p>There is no mention of historic environment assets so suggest adding the following: On page 19, ‘Appendix 2: Green infrastructure checklist’ consideration should be given to an additional check box that states “<i>identifies historic environment assets and recognises their significance in the site design</i>”, within the ‘Site Analysis’ flowchart</p> | <p>Agreed, this change has been made.</p> |

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| | blue box, under the 'Site Appraisal' section. This would ensure the consideration of gardens and designed landscapes, scheduled monuments and The Antonine Wall (FRE) World Heritage Site and recognise their contribution to green infrastructure. | |
| RSPB Scotland | . In general, the guidance is welcomed and the onus it puts on developers to protect and enhance the green network and green infrastructure. | Noted |
| | <p>Page 8 Green infrastructure function: habitat enhancement</p> <p>1. Some of the wording of the document might be interpreted as suggesting that biodiversity protection and enhancement should be identified and considered, rather than actually delivered. It is recommended that this wording be strengthened: Replace: "Proposals for new development should consider whether the site can protect or enhance habitats to safeguard existing networks or deliver new habitat to connect fragmented networks." With 'Proposals for new development must protect or enhance habitats, to safeguard existing networks or deliver new habitat to connect fragmented networks.' This would still be valid even when there are no significant habitat features on site, as the development can progress whilst they remain protected.</p> | A change has been made to 'Proposals for new development must consider whether the site....'. The intention of this part of the supplementary guidance is to show how the requirement of Policy CP2e can be met. Policy CP2e does include the stronger formulation "Development proposals must protect, restore and enhance biodiversity habitat networks, and environmental quality within and linking to the site" and this guidance shows that consideration of how this can happen as informed by appropriate surveys. |
| | 2. The document suggests that the Green Network Blueprint developed by the Glasgow and Clyde Valley Green Network Partnership should be used to identify | Agreed. This change has been made. |

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| | <p>whether the site can protect or enhance habitats to safeguard existing networks or deliver new habitat to connect fragmented networks. The Blueprint does not provide sufficient detail to do this and it is recommended that the following be reworded: Replace: “This work should be guided by the Green Network Blueprint developed by the Glasgow and Clyde Valley Green Network Partnership, which details existing habitats critical to the network and where connections should be made to improve habitat connectivity.” With ‘This should be informed by appropriate surveys and assessment. The Green Network Blueprint developed by the Glasgow and Clyde Valley Green Network Partnership can provide strategic guidance on habitats critical to the wider network and where connections should be made to improve habitat connectivity.’</p> | |
| | <p>Page 9 Table 1 They are concerned that the Matrix suggests that the provision towards habitat networks is dependent on whether there is a need or opportunity. It is felt that this could lead to confusion, particularly if the intention of the guidance is that sites should be enhanced for biodiversity, in which case a ‘need’ should already be established. It is unclear when a site ‘needs’ to be enhanced and when does it not. The wording should be amended to add clarity to this.</p> | <p>The matrix has been amended to indicate that habitat provision/enhancement is required on residential development sites of 10 or more houses.</p> |
| <p>Scottish Environment</p> | <p>The commitment to a green infrastructure first approach to development is supported. Welcome the measures therein to safeguard, enhance and expand</p> | <p>It is noted that Scottish Environmental Protection Agency has not specific comments on this document and the support for the green infrastructure first</p> |

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| Protection Agency | existing networks and the connections between them and support multi-functionality (e.g. by integrating water management measures such as SuDS). | approach as well as the measures to safeguard, enhance and expand existing networks are welcomed. |
| Sportscotland | <p>The guidance and policies referenced within appear to generally support, protect and improve green space that (alongside other functions) provide opportunities to engage in physical activity, sport and recreation.</p> <p>The procedural approach towards green space provision appears logical. In relation to outdoor sports facilities specifically – such as pitches, playing fields, golf courses, bowling greens etc – it's not clear how demand for these will be accounted for when assessing and providing for green space in new developments or calculations for developer contributions. It is understood that the Open Space Audit 2016 (update 2018) will inform new green space typology, provision and investment – based on need and demand. They have not been able to access this document. The previous Open Space Audit 2011, which is available online, excluded some spaces for sport (pitches) in the audit process. It's not clear whether this is the case in the revised document. The planning and provision of places for sport and recreation should be based on an up-to-date audit of facilities alongside a strategic assessment of demand and need for them.</p> | The 2016 Open Space Audit, like the 2011 audit, did not include sports pitches (MUGAs were assessed). Sports pitches are an eligible project for developer contribution funding, although it is accepted that an up to date sports pitch strategy would be beneficial in allocating contributions towards these resources. |
| Strathclyde partnership for Transport | No comments | Noted |

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| <p>Local resident</p> | <p>First of all I shall make a comment on the introduction.</p> <p>There are references here to the outstanding natural environment being shaped by the area's history, boasting of our parks, woodland areas, designed landscapes at Overtoun House, Kilpatrick Hills etc. However these areas are largely out of bounds to the local horse riders for various reasons.</p> <p>Our area as so many others has been shaped by the use of horses, without them there would be no industry, no transport, nothing. Without horses nothing was possible but yet today this has been forgotten, our canal towpaths are dangerous, our surfaces are unsuitable and our roads are dangerous. We owe horses everything but there is seemingly no place for them in our area, they have been forgotten.</p> <p>This council is laying down cobbles on our high streets but is it even known why there were cobbled streets in the first place - to stop the cart horses feet slipping, these horses helped our industries flourish and made transport possible. They are our heritage and there should be a special place for our horses within West Dunbartonshire.</p> <p>Look at places like London, public riding arenas in the parks, bridleways in the parks what does West Dunbartonshire have? Around half a mile of actual designated bridleway if that (Auchnacraig estate) and no parking access for horseboxes so we cant even</p> | <p>Whilst the comments support the benefits of increasing facilities for horses and horse riding, unfortunately the guidance document is not considered to be the appropriate document for the promotion of horse-riding and horse-riding facilities that the respondent is seeking.</p> |
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| | <p>get to use the tiny part of bridleway provided. Our hills are gated and have unsuitable surfaces, steps and unsuitable narrow bridges are everywhere, our riding areas are built upon or inaccessible and to top it all in our official documents such as this horses are not even mentioned.</p> <p>There are many horse owners in the area, several livery and private yards. Horse owners have immense spending power, the equestrian industry is a huge tourist industry and recreational industry not to mention one of the most green forms of travel possible, horses get people out of their houses and into the outdoors and fresh air, they help with mental health , it is a scientific fact that being around them lowers your heart rate.</p> <p>We must promote horses and equestrian activity in our area. We have great places to ride we just need access to them before its too late and you build everywhere. Horses can elevate our area from the socially and economically deprived area it currently is.</p> <p>Most if not all horse riders have been involved in a road traffic incident of some sort, I know I have, we take our lives in our hands taking our horses out of their fields and this council does nothing so I hope you will take on board my comments and we can see some changes being made.</p> | |
| | <p><u>Benefits of green networks and green infrastructure</u></p> <p><u>The following are listed as a benefit</u></p> | <p>It is acknowledged that horseriding is another recreational activity and sport that can benefit from improved access to green infrastructure, however no</p> |

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| | <p>Off road active travel and recreation routes Locations for sport and recreation</p> <p>It goes on to say they are made more valuable when they are multi functional and connected providing off road routes</p> <p>This should be expanded to include reference to horse related activities and access – not all sport and recreation is football, walking or cycling.</p> <p>Horse riding is much more inclusive than many sports as men and women compete on equal terms and together, age and ability is no barrier either. Horses can allow freedom of movement to those who cannot have this on their own and horse riding makes places more accessible than with wheelchairs.</p> | <p>single sport is singled out in this section, so no change should be made in this regard.</p> <p>These comments are also relevant to the Creating Places Supplementary Guidance and the respondent has agreed they may be addressed in relation to that consultation.</p> |
| | <p>When paths are for multi users thought should be given to all potential users and suitable surfaces installed, designated bridleways could be installed - these could be side by side with a “horse lane” or suitable parking provided for horseboxes. Less use of steps to allow better access for horses</p> | <p>These comments are more relevant to the Creating Places Supplementary Guidance and the respondent has agreed they may be addressed in relation to that consultation.</p> |
| | <p>The access priorities mentioned currently have no mention of equestrian access and access to many of these places is impossible or limited at best.</p> <p>Kilpatrick Hills - gated and keys needed – when I have enquired before about getting a key, yes I was given it but I was originally told I had to hand the key back in after my ride. I did manage to be allowed to</p> | <p>These specific issues raised in relation to equestrian access are outwith the scope of this consultation. They have been passed to the relevant service.</p> |

keep hold of the key however for most people with less connections than I perhaps have mean the hills are a no go area. On a rare nice day a horse rider can not then try to get a key last minute especially when this is likely to be a weekend, evening or at short notice so in effect the hills are inaccessible.

Surfaces of the Kilpatrick Hill paths. The lower reaches are okay so if you got a key th, however if you get as far as the Humphrey then the surfaces are mostly unsuitable unless you try to stick to the grass edges which is seemingly frowned upon. Rough stone tracks are not suitable for the modern horse so im not sure why these surfaces are so widely used.

The John Muir Way is more or less impassable for horse riders

All licensed premises in the area should be contacted for their opinions on horse access and should be automatically given keys to gates areas each yr without fail (if the gate system remains in place) eg saltings, bowling, overtoun, auchnacraig, forestry commission (ok hills)

Bowling harbour - gated in evening and the other route is unsuitably surfaced. Some paths are too narrow and unsafe. Tarmacking paths is not always the answer as more naturalised routes can be more beneficial to use as a horse rider. Maintenance of all areas needs looked at, shrubs cut back, fallen trees removed, paths kept open and usable etc

Forth and Clyde canal whilst the surface is suitable is plagued by illegal quad and motor bikers making it a volatile route at certain times. Nothing is ever done about these bikes so although the route along canal path taking in the saltings and bowling harbour and beyond to Milton is well surfaced and suitable it is sometimes unusable due to the dangers. There are off roads routes running alongside that if maintained properly (old railway line) could provide a safer option or if the quad bike situation was policed it could make the canal path route safer and more suitable.

Unsuitable bridges in certain parts - ie behind Hillview nursing home – some of our rides are urban and involve industrial estates as these are safe places in evenings and weekends but are not often thought about as such but again we need access as sometimes these industrial areas have the most green spaces or provide access to parks.

Dalmuir park – no horsebox parking, no bridleway, unsuitable bridges, limited access and unsuitable surface at the path between park and golf course

Levengrove park - no horsebox parking, no bridleway

The Saltings parking is closed off to those with horseboxes so only walkers and cyclists can use it. This needs addressed as why have off road routes when horse riders are effectively banned from its use if we cant get there to ride. Bridges making shorter circular routes not in use and seemingly no plans to

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| | <p>rectify. Some bridges unsuitable for horses (wooden one with chevrons and no other crossing next to it is one example).</p> <p>Auchnacraig estate - no suitable parking as locked and gated cars can get in but not horseboxes. Unsuitable and broken decking used to cover boggy areas. Lack of signposting for out of town riders showing routes to other areas.</p> <p>Horse riders have no safe route to Hardgate and the hills, there is no horse crossing anywhere, there are no off road routes and cut off by the A82.</p> <p>Overtoun estate – gated and locked and steps everywhere making most of it inaccessible to horse riders.</p> <p>Exxon development - no equestrian access thought of at all - this could be like mugdock country park but no nothing about equestrian access anywhere.</p> <p>Carless site - excellent opportunity here to link up many local routes from old Kilpatrick, bowling and Clydebank - again no mention of equestrian usage/access</p> <p>Hardgate knowes – no equestrian parking or access as far as im aware but not a place I ride as again I cant get there so assume no one else can either.</p> | |
| | <p>Whilst applaud the plans to conserve routes and the current infrastructure mentioned under KH1, G1I,</p> | <p>The approach set out in the Supplementary Guidance is based on the Local Development Plan, and</p> |

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| | <p>ENV1, ENV2, ENV3, ENV4, ENV5, ENV6 and CON3 need to do more and go further in regards to enhancing and expanding the green network.</p> | <p>complements and is proportionate to that approach. It would not be appropriate for the Supplementary Guidance to go beyond what is included in the Local Development Plan.</p> |
| | <p>Green infrastructure function – agree with this which is mentioned on p8 however there is no mention of horse access, equestrian facilities or connecting currently used equestrian routes, do not assume that because you don't see horses or know nothing of them that they are not present and using the area.</p> | <p>The section on access networks relates to all forms on non-motorised access, whilst not identifying any specific type. Therefore a specific reference to horse access, equestrian facilities etc is not considered appropriate. Reference to multi-user paths have been added to the guidance.</p> |
| | <p>Contributions could be used more effectively and certainly should include equestrian access facilities. You need to be aware of the local equestrian sites and premises and plan accordingly. The people living in new homes see horses as a local amenity and children love to see them riding past or enjoy going to see them at their fields but if you do not sort out the correct access and facilities this will be lost. Contributions made could be used to fund improvements or to include equestrian access.</p> | <p>Where appropriate the Council will seek to develop or require multi-user paths that would also be appropriate for equestrian use. Reference to multi-user paths have been added to the guidance.</p> |
| | <p>Funding is the reason our equestrian facilities are sub standard so this is a chance to rectify it.</p> | <p>Equestrian facilities, as part of multi-user green network projects, would be an eligible use of developer contribution funding. However, this document does not set out eligible projects.</p> |
| | <p>The contributions from developers needs to be extended to include non residential developments as these are often on sites used by horse riders and are the bigger areas giving more opportunity to get funding for more appropriate paths etcIndustrial estates are useful and safe hacking areas at weekends and evenings and winter nights.</p> | <p>The guidance does not seek developer contributions from commercial or non-residential development, where the focus is the provision of green infrastructure within the development itself. This is because this type of development is not considered to increase user demand for the green network outwith the development site in the same way that residential development does.</p> |

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| | <p>The money being returned after 10 yrs if not used is madness. This needs removed there cannot be some usage to which the funding could be put – pathway improvements for one to allow equestrian access – the bridges at Saltings is another example to which it could be put. Money should be used not returned.</p> | <p>It is considered that this retention period is reasonable considering development timelines for housing sites or the subsequent delivery of associated green infrastructure projects. The inclusion of a retention period will also encourage the Council to make use of funds. Planning Circular 3/2012 does not specify a reasonable timeframe, it therefore sits with the planning authority to fix one that is reasonable. It is agreed that projects should be delivered as associated with a given development before this trigger is met.</p> |
| | <p>Horses and biodiversity go hand in hand, you can look at my field and see what the nature is like there. Horses are not a barrier to nature and wildlife habitats nor are they a nuisance not when proper access and riding routes are provided to us. In particular it would eradicate any perceived nuisance aspects of horse riding in the area – riders on pavements in Hardgate – they have no horse crossing nor proper access to safe off road riding from their yards at Hardgate near roundabout to the bridleway at Cochno. This could be addressed by use of developer funding.</p> | <p>The document does not suggest that horses are a barrier to nature/habitats, nor that they are a nuisance.</p> <p>The purpose of this document is not to set out the specific projects that developer contributions will be spent on. However the comments made will be taken into account when future projects are being scoped out.</p> |
| | <p>Maintenance or stewardship is also an issue – grass needs cut, paths cut into it is a useful feature for horse access (this does take place at the small park near golden jubilee hospital and its very useful, one of the few things that actually helps horse access, there is also parking here for horseboxes, and there is a need more of this elsewhere).</p> <p>Verges cut down allows horses to be off the main parts of track in light of there not being an actual</p> | <p>The guidance includes a section on green infrastructure stewardship, requiring that maintenance arrangements are put in place for green infrastructure associated with new development.</p> |

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| | <p>horse track installed. Wide verges at side of roads gets us off the roads too. This enhances safety for all road and path users and also reduces hay fever issues which does affect horses as well as people.</p> <p>Bridges need fixed or made more suitable (paths can be created under or beside them in some cases) and rubbish in particular glass needs removed more regularly.</p> | |
| | <p>There is funding for off road access available from British Horse Society and horse riders if they could get better off road access but funds need diverted to some equestrian usage so please include it within this document and future plans.</p> | <p>The supplementary guidance does not to set out specifics on the types of projects that developer contributions will be spent on. This information is set out in the Developer Contributions documents available on https://www.west-dunbarton.gov.uk/council/strategies-plans-and-policies/local-development-planning/other-guidance-and-information/</p> |
| | <p>Developer payments should be local to the development and not used out of the area. They should be of benefit to the people living in and around that area and should only be used for some kind of green space or access purpose and percentages could be split up so its not all going to playparks, it needs to be equal so it does not just benefit one group of people. Right now horse riders are a forgotten part of this so some money should be spent on that initially to balance things up. Where people can walk, horses can too, you just need to include the horse riding aspect, they are not mutually exclusive.</p> <p>Where the money should be spent should be more visible and perhaps up for discussion, more frequent</p> | <p>The Council has approved separate documents explaining how developer contributions will be allocated, monitored and reported https://www.west-dunbarton.gov.uk/council/strategies-plans-and-policies/local-development-planning/other-guidance-and-information/</p> |

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| | <p>updates should be made, annually is not enough. I can certainly put forward some suggestions that would immediately assist horse riders in the area and im willing to be part of any projects or discussions on this perhaps with the access officer or greenspace staff. It cant and shouldn't all go to playparks and community gardens.</p> | |
| | <p>On a wider note developers need to be stopped pulling down the mature trees on site and replacing them with tiny saplings, this doesn't help with climate change in any way and happens all the time. In one example a block of flats, over 300 trees were cut down and they have been replaced with small shrubs about 10 of them. These trees were all mature with many in excess of 50 yrs old. This must be stopped, developers can keep existing trees around boundaries which makes the whole site nicer for residents and better for wildlife but time and time again everything is cleared and a blank site is the starting point. The keeping of mature trees must be enforced even the ones which seemingly are not in best of health, even an unhealthy tree can live for hundreds of yrs. I have 2 ancient willows on my rented field and both grow almost horizontally, they are still alive, no danger of falling over and are a beautiful feature.</p> <p>Existing trees onsite must be kept and developers must adhere to this. Climate change is important so take actions to prevent it worsening.</p> | <p>These comments are more relevant to the Creating Places Supplementary Guidance and the respondent has agreed they may be addressed in relation to that consultation.</p> <p>The Council is also intending to prepare planning guidance (non-statutory) on trees which would cover these matters.</p> |
| | <p>Balconies are not an acceptable outdoor space, gardens should be compulsory on all developments</p> | <p>These comments are more relevant to the Creating Places Supplementary Guidance and the respondent</p> |

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| | <p>even if it means less buildings on site (no bad thing). Who uses their balconies, the ones on the main road in Clydebank face on to a busy road, who is going to sit out there with all the fumes from the road. Gardens are a must not unusable balconies. Do remember that this council has covered in most of these balconies in recent years for safety reasons so don't start putting them in again instead of actual gardens.</p> | <p>has agreed they may be addressed in relation to that consultation.</p> |
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