

Appendix 1 - Consultation Responses

Organisation	Contact	Supportive?	Comments	Response
SEPA	Brian Fotheringham	Generally supportive of the aims and outcomes of SPG	1. Introduction – support statement that the provision of all required ‘Supporting Documents’, e.g. (FRA’s) is key to recognising and addressing the issues at proposed developments, particularly for larger developments.	Noted
			2. Character and Setting – endorse retaining ‘natural features, utilising the benefits of open watercourses as features of a site	Noted
			3. Layout and Plot Sizes – we would highlight that the promotion of ‘at source’ SuDS, e.g. driveway drainage (permeable surfaces) is seen by SEPA as an important and integral element of plot design.	Add new paragraph on p11 promoting “at source” SUDS within plot and give illustrations
			4. House Design – no comments	Noted
			5. Landscaping, Open Space and Play Areas – very supportive of the measures being promoted in this section particularly the concept that this aspect of the site development is not an afterthought but is deemed an essential part of the design process. Very encouraged by all of the statements in respect of the SuDS provision at sites and the emphasis given to links to green networks and green infrastructure.	Noted
			6. Roads & Parking – pleased to note that ‘road drainage’ is a factor which needs to be considered in the RCC Process and again is an important element of the overall SuDS strategy of a site.	Add question in “Street Structure” to highlight this.

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			7. Community Safety – Would highlight that SuDS ponds may be considered by some as a risk to community, however we would state that with good design this risk can be minimised.	Add sentence on p23 after “youth shelters”
			8. Planning Application Process – Pleased to see statement that pre-application discussion continues to be promoted by the Planning Authority and also with the key agencies and would reiterate our willingness to engage at this stage.	Noted
SNH	Nick Everett	Yes	9. We support this guidance in its design-led rather than standards-based approach to residential development, and its intention to inform innovative and context-sensitive designs. We welcome the promotion of the six qualities of successful places derived from “Designing Places”, and which all schemes will be required to address.	Noted
			10. In terms of Character and Setting, we welcome the focus on the appraisal of the site and its surroundings to determine the landscape context. We recommend that within the emphasis on conserving and enhancing natural features such as watercourses and trees, the text should refer also to the resulting benefits in terms of ‘advance greening’, increasing the attractiveness of a development from the outset. Also, the list of ‘Character & Setting’ questions could usefully include <i>“Does housing face and integrate with any new countryside / Green Belt edge, or turn its back on it?”</i>	Add line on “advance greening” at p6 in same para as “natural features”. Add additional question.
			11. We welcome the need for ease of pedestrian and cycle access throughout a development layout, and accessibility to the public transport network, to be considered at an early stage in the design process.	Noted

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			<p>12. We support the Council’s vision for a more extensive, functional and better connected green network of open and green spaces and for the requirement sought through this guidance for residential development proposals to demonstrate that they will enhance and integrate into the green network. We further welcome the Council’s support for the concept of green infrastructure in strategic land use planning.</p>	Noted
			<p>13. We consider that the complementary illustrations provided alongside the text, will increase the value of this Guidance to users considering new development proposals. We recommend that the requirement for supporting documents (p5) should include a definition of “sensitive sites”.</p>	Add a definition box in margins of p5 for sensitive sites.

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Persimmon Homes (West Scotland)	Craig Moore	Concerns over two aspects	<p>14. The Supplementary Guidance sets out the following plot ratios as minimum requirements: <i>“Detached and semi detached – 30:70 Terraced properties – 40:60”</i> It is stated in the Guidance that: <i>“for example, if a terraced property has a footprint of 80m sq then the garden (front and rear combined) should be at least 120m sq.”</i> (pg 11)</p> <p>These requirements are simply not realistic in terms of minimum standards for modern housing layouts, designs and types. We therefore recommend that the Council adopt a more realistic approach in this regard.</p> <p>The following should replace the existing wording on pg 11 on plot ratios for detached, semi detached and terraced properties:</p> <p><i>“At the basic level is the relationship between the house and the plot. Plot ratios link the footprint of the building with the garden size, and we expect the below plot ratios to act as a guide for the following types of new housing: Detached and semi detached – 30:70 Terraced properties – 40:60 Higher or lower ratios may be appropriate and these should be explored in the design statement. A minimum requirement of 100sq of private garden ground for detached and semi detached houses and 50 sq m for terraced properties.”</i></p>	<p>Plot ratios are considered to be important to provide a minimum framework for garden sizes as this has been a problem in WDC area.</p> <p>No amendment.</p>

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			<p>15. It is also stated in the Guidance that: <i>“Driveways must be accommodated to the side of the building for detached, semi-detached and end terraced buildings”</i> (pg 11). Each housebuilder will have a significantly varied view on plot arrangement. In the case of Persimmon Homes, where the majority of our house types incorporate integral garages, these would not lend themselves to a driveway being accommodated to the side of the property.</p> <p>The supplementary guidance should also be reworded to adopt a more realistic approach to the accommodation of driveways (pg 11). Wording in the guidance requiring driveways to be accommodated to the side of the building for detached, semi-detached and end-terraced buildings should be removed.</p>	<p>Houses should reflect the site not the developers “house range”. Designing Streets (page 25) suggests as a layout consideration that keeping kept level with or behind the main building line can be aesthetically beneficial in streetscape terms. Therefore although there is no specific reference to integral garages, the requirement to ensure cars do not dominate the streetscape is a consideration.</p> <p>As this guidance seeks to reduce domination of the car no amendment is proposed.</p>
SportScotland	Claire Peters	Yes but need to clarify.	<p>16. The introductory text of Section 5. Landscaping, Open Spaces and Play Areas, makes reference to playing fields and sports pitches, as well as other forms of open space. However, there is no further reference in the Guidelines to playing fields or open spaces – with the Guidance focusing on play areas and local views.</p> <p>17. Playing fields, sports pitches and other outdoor facilities (as defined in Development Management Regulations 2013 (30 June 2013); serve a particular function (formal and informal recreation, training and sport) which are not catered for by other forms of open space (e.g. landscaping, SuDS ponds etc). We strongly recommend that the differing functions of the various types of open space are recognised in Development Plan policy and associated Supplementary Guidance; and</p>	<p>There will be a separate SPG on outdoor provision of this nature so insert a line to this effect.</p> <p>There will be a separate SPG on outdoor provision of this nature so insert a line to this effect.</p>

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			<p>18. We advise that consideration of any new outdoor sports facilities is considered at a strategic scale; ideally based on an up-to-date Sport Facility / Pitch Strategy; rather than a standards-based method. The former approach is evidence based and can consider Council and area-wide provision and any shortfalls; and there is an opportunity for any such shortfalls to be addressed through developer contributions if appropriate.</p>	<p>Agree. A matter for separate supplementary guidance</p>
			<p>19. For information in 2012 sportscotland commissioned a national run of our Facilities Planning Model (FPM) in connection with sports halls, swimming pools and Synthetic Grass Pitches (SGPs). The FPM is a tool to provide an objective assessment of the likely demand for sports facilities. We have prepared a West Dunbartonshire summary of the national FPM run, and we can pass a copy of this to the Development Plan team if this would be of assistance.</p>	<p>Noted</p>
			<p>20. Suggest that clarity is given as to the role of different types of open space.</p>	<p>Insert para clarifying roles – definition box on p15</p>

2 April 2014