

# Agenda



## Planning Committee

**Date:** Wednesday, 21 March 2018

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**Time:** 10.00

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**Venue:** Committee Room 3,  
Council Offices, Garshake Road, Dumbarton

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**Contact:** Craig Stewart, Committee Officer  
Tel: 01389 737251, [craig.stewart@west-dunbarton.gov.uk](mailto:craig.stewart@west-dunbarton.gov.uk)

Dear Member

Please attend a meeting of the **Planning Committee** as detailed above. The business is shown on the attached agenda.

Yours faithfully

**JOYCE WHITE**

Chief Executive

Distribution:-

Councillor Jim Finn (Chair)  
Bailie Denis Agnew  
Councillor Jim Brown  
Councillor Gail Casey  
Councillor Karen Conaghan  
Councillor Diane Docherty (Vice Chair)  
Councillor Douglas McAllister  
Councillor Marie McNair  
Councillor John Mooney  
Councillor Lawrence O'Neill

All other Councillors for information

Date of Issue: 8 March 2018

**PLANNING COMMITTEE**  
**WEDNESDAY, 21 MARCH 2018**

**AGENDA**

**1 APOLOGIES**

**2 DECLARATIONS OF INTEREST**

Members are invited to declare if they have an interest in any of the items of business on this agenda and the reasons for such declarations.

**3 MINUTES OF PREVIOUS MEETINGS 5 - 8**

Submit for approval as correct records, the Minutes of Meetings of the Planning Committee held on:-

- (a) 21 February 2018 (Ordinary Meeting); and
- (b) 26 February 2018 (Special Meeting).

**4 OPEN FORUM**

The Committee is asked to note that no open forum questions have been submitted by members of the public.

**5 PLANNING APPLICATIONS**

Submit reports by the Strategic Lead – Regulatory in respect of the following planning applications:-

- (a) DC17/140 – Mixed use development incorporating a football stadium and associated uses (including restaurant, hospitality and function suites), residential development, commercial and tourism development, floodlit sports pitches, access, parking, and landscaping etc. at Land at Young's Farm, Renton Road, Dumbarton by DFC Community Stadium Company Ltd.

**9 - 28**

- (b) DC17/293 – Change of use of former school site to public open space including construction of footpath network, installation of play and leisure equipment, biodiversity landscaping, community garden with associated parking and ancillary structures at the former St Eunan’s primary school site, Melfort Avenue, Clydebank by West Dunbartonshire Council.

**29 - 40**

**6 STREET NAME FOR NEW HOUSING DEVELOPMENT SITE 41 – 44  
AT THE FORMER BONILL PRIMARY SCHOOL SITE, BONHILL**

Submit report by the Strategic Lead – Regulatory seeking approval for a new street name for the housing development site on land at the former Bonhill Primary School site.

**7 STREET NAMES FOR NEW HOUSING DEVELOPMENT SITE 45 – 48  
AT LOMONDGATE AREA 5 BY TAYLOR WIMPEY UK LTD.**

Submit report by the Strategic Lead – Regulatory seeking approval for new street names for the housing development site at Lomondgate Area 5, Dumbarton.

**8 LOCAL DEVELOPMENT PLAN 2: MAIN ISSUES 49 – 120  
REPORT CONSULTATION RESPONSES**

Submit report by the Strategic Lead – Regulatory informing of the responses received to the Main Issues Report consultation exercise and advising on the next steps.

## **PLANNING COMMITTEE**

At a Meeting of the Planning Committee held in the Council Chambers, Clydebank Town Hall, Dumbarton Road, Clydebank on Wednesday, 21 February 2018 at 10.00 a.m.

**Present:** Bailie Denis Agnew and Councillors Jim Brown, Gail Casey, Karen Conaghan, Diane Docherty, Jim Finn, Marie McNair, John Mooney and Lawrence O'Neill.

**Attending:** Pamela Clifford, Planning & Building Standards Manager; Erin Goldie, Team Leader – Development Management; and Nigel Ettles, Section Head – Litigation.

**Apology:** An apology was intimated on behalf of Councillor Douglas McAllister.

**Councillor Jim Finn in the Chair**

### **DECLARATIONS OF INTEREST**

It was noted that there were no declarations of interest in any of the items of business on the agenda.

### **MINUTES OF PREVIOUS MEETING**

The Minutes of Meeting of the Planning Committee held on 31 January 2018 were submitted and approved as a correct record.

### **OPEN FORUM**

The Committee noted that no open forum questions had been submitted by members of the public.

### **PLANNING PERFORMANCE FRAMEWORK 2016-17**

With reference to the Minutes of Meeting of the Planning Committee held on 31 January 2018, a report was submitted by the Strategic Lead – Regulatory informing of the recent comments received from the Scottish Government and the peer review regarding the Planning Performance Framework submitted by this Council for 2016-17.

It was noted that, with regard to paragraph 3.1 of the report, that North Lanarkshire Council were in the SOLACE Group with West Dunbartonshire Council and the other Councils named in that paragraph.

After discussion and having heard the Planning & Building Standards Manager in elaboration and in answer to Members' questions, the Committee agreed to note the content of the report and the comments received from the Scottish Government and peer reviewer.

The meeting closed at 10.13 a.m.

## **PLANNING COMMITTEE**

At a Special Meeting of the Planning Committee held in the Council Chambers, Clydebank Town Hall, Dumbarton Road, Clydebank on Monday, 26 February 2018 at 10.00 a.m.

**Present:** Bailie Denis Agnew and Councillors Jim Brown, Gail Casey, Karen Conaghan, Diane Docherty, Jim Finn, Marie McNair and Lawrence O'Neill.

**Attending:** Richard Cairns, Strategic Director – Regeneration, Environment & Growth; Peter Hessett, Strategic Lead – Regulatory; Pamela Clifford, Planning & Building Standards Manager; Raymond Walsh, Interim Manager – Roads and Transportation; Antony McGuinness, Team Leader – Forward Planning; Erin Goldie, Team Leader – Development; Keith Bathgate, Lead Planner – Development Management and Craig Stewart, Committee Officer.

**Apologies:** Apologies were intimated on behalf of Councillors Douglas McAllister and John Mooney.

**Councillor Jim Finn in the Chair**

### **ONE MINUTE SILENCE**

After hearing Councillor Finn, the Committee was upstanding to observe a one minute silence in remembrance of Council Officer Stuart Gallie, who passed away suddenly at the weekend.

### **DECLARATIONS OF INTEREST**

It was noted that there were no declarations of interest in the item of business on the agenda.

**PLANNING APPLICATION DC17/177: ERECTION OF BRIDGE OVER RIVER CLYDE, WITH NEW ACCESS ROAD, UPGRADING AND WIDENING OF DOCK STREET, JUNCTION IMPROVEMENTS ON GLASGOW ROAD AND FORMATION OF NEW SHARED FOOTWAY/CYCLE WAY TO YOKER RAILWAY STATION, BY RENFREWSHIRE CITY DEAL TEAM**

A report was submitted by the Strategic Lead – Regulatory on the above application which has been referred to the Scottish Ministers for determination.

After discussion and having heard the Planning & Building Standards Manager and relevant officers in further explanation of the report and in answer to Members' questions, Councillor O'Neill, seconded by Councillor Casey, moved:-

That notwithstanding concerns regarding the obscene haste of the Scottish Government Reporter in applying deadlines for the Council's response to the application, without regard to the requirements of having a full economic assessment and a full transport assessment, the Committee should not reject the proposal out of hand, as a bridge between Renfrew and Clydebank could bring huge benefits to Clydebank and West Dunbartonshire as a whole, and would also help towards the future regeneration of the Queens Quay site.

As an amendment, Bailie Agnew, seconded by Councillor Docherty, moved:-

That the Committee agree the recommendation in the report and to object to the proposal for the reasons set out in the report, and such further reasons as may arise from the completion of the review of the transportation assessment, which was reported to the Committee verbally.

At the request of Councillor O'Neill, the Committee agreed to proceed by way of a roll call vote.

On a vote being taken 6 Members, namely Bailie Agnew and Councillors Brown, Conaghan, Docherty, Finn and McNair voted for the amendment and 2 Members voted for the motion, namely Councillors Casey and O'Neill.

The meeting closed at 11.10 a.m.

## WEST DUNBARTONSHIRE COUNCIL

### Report by the Strategic Lead - Regulatory

Planning Committee: 21 March 2018

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**DC17/140:**            **Mixed use development incorporating a football stadium and associated uses (including restaurant, hospitality and function suites), residential development, commercial and tourism development, floodlit sports pitches, access, parking, and landscaping on land at Young's Farm, Renton Road, Dumbarton by DFC Community Stadium Company Ltd.**

### 1. REASON FOR REPORT

- 1.1** This application is for a major development which would be a significant departure from the adopted development plan. Under the national regulations relating to the handling of planning applications, it requires to be determined by the full Council. The Council's procedure requires that a pre-determination hearing take place at the Planning Committee, before the full Council considers and determines the application.

### 2. RECOMMENDATION

- 2.1** That the Planning Committee considers the details of the development and **refers the application to the full Council** for determination, expressing the provisional view that the application should be refused for the reasons set out in Section 9.

### 3. DEVELOPMENT DETAILS

- 3.1** The application site relates to land extending to 44.5 hectares which is located between Dumbarton and Renton and is predominantly used as agricultural land but also includes open areas along the edge of the River Leven. The site is bounded by a railway line to the west, River Leven to the east, a slip road from the A82 to the north and a Travelling Persons site to the south. There are some gradual level changes across the site as the area adjacent to the River Leven sits at a lower level and is at risk of flooding. A burn runs through the site from the west towards the River Leven. The majority of the site is used for grazing and is therefore relatively clear of trees or scrub. However, there are areas containing trees and hedges on the southern part of the site, adjacent to the burn and A82 slip road and along the edge of the River Leven.
- 3.2** Planning permission in principle is sought for a mixed use development which seeks to construct a new football stadium for use by Dumbarton Football

Club. A masterplan has been submitted as part of the application which includes the following details:

- A 4,000 capacity football stadium comprising 3,000 seats and space for 1,000 spectators on terracing. The stadium would also incorporate function suites, a supporters bar, club shop, changing facilities and flexible space which could be used to provide hotel, office, gym or restaurant/café type uses;
- Related hospitality accommodation and complementary non-football related uses - healthcare/gym/leisure facilities, hotel, conferencing suites, restaurant and offices;
- Two full size synthetic football pitches, a full size grass football pitch and nine 5-a-side pitches which could be adapted for 7-a-side games. These would be used to provide dedicated training facilities for Dumbarton Football Club and available for community use;
- Coach and car parking facilities; and
- Enabling residential development of approximately 200 dwellings.

**3.3** The indicative layout of the stadium indicates that it has been designed to allow it to be constructed in phases if required. It is proposed that the new football stadium would replace the existing football stadium on Castle Road and that the existing site would be developed for housing once the new stadium was built at Young's Farm. Proposals for the redevelopment of the existing Castle Road site do not form part of this application and would not form part of the enabling residential development associated with the new football stadium. It is proposed that 11 hectares of the Young's Farm site would be used for residential development and it has been indicated at this stage that around 200 houses could be accommodated on the site. The money generated from the sale of this land for housing would be used to fund the building of the new stadium. The residential areas would be located to the south of the stadium and the masterplan shows the residential site divided into four specific areas. The remainder of the site would remain undeveloped/landscaped and would include scope for the provision of a tourist attraction such as a formal park area with visitor centre.

**3.4** The main access would be formed on the A82 slip road and service the football stadium, associated uses and the residential development. Forming the new access would involve construction of a roundabout and the detrunking of part of the off-slip to facilitate two-way traffic. There would be a secondary/emergency access to the south-west of the site which would lead to Renton Road. Where the A82 slip road meets Renton Road, the existing junction would be upgraded to a signal controlled junction. Within the site, 788 parking spaces would be provided and 30 spaces for coaches for use on match days.

**3.5** In order to address the various technical issues associated with the proposal, the following documents have been submitted as part of the application: an Environmental Impact Assessment, a Flood Risk and Drainage Strategy Statement, a Flood Risk Assessment, a Design and Access Statement, an Ecological Appraisal, a Historic Environment Desk Based Assessment, a

Planning Statement, a Site Investigation Report, a Pre-application Consultation Report and a Financial Sustainability Report.

## **4. CONSULTATIONS**

- 4.1** West Dunbartonshire Council Roads Service recommend refusal of the application. They cannot support the application due to the omission of detailed analysis of how the surrounding road network will function, particularly on match days. This is necessary in order to determine if any existing junctions or any parts of the road network can accommodate the development and/or will require upgrading. Furthermore detailed arrangements for the secondary access, pedestrian provision, access to public transport to support and promote active travel have not been adequately addressed. Also, further consultation with Scottish Fire and Rescue will be required regarding provision of an adequate emergency access. Full details of the requirements and improvements are addressed in Section 7.26 - 7.28.

In addition to requiring the detailed design of the new road layout to be addressed and to provide adequate parking, cycle provision and servicing arrangements, the Roads Service specifically advise that the following is required:

- Provision of lighting and a 3m wide pedestrian/cycle path the length of Renton Road, including associated junction and crossing improvements;
- Provision of a new signalised junction on Renton Road along with suitable speed restrictions;
- Provision of up to four structures (including on the detrunked section of the A82 slip road) over the railway to ensure adequate pedestrian/cycle provision;
- Provision of suitable pedestrian crossings (eg. Toucan) in addition to the new signalised junction;
- Provision of suitably located bus stops on Renton Road which include real time updates; and
- A footway must be provided on the west side of Renton Road between the nearest bus stop to the site and the proposed signalised crossing or an additional controlled crossing is required.

- 4.2** West Dunbartonshire Council Environmental Health Service has no objection to the proposal subject to conditions relating to contaminated land, drainage, lighting, noise, construction hours, piling and air quality.

- 4.3** Transport Scotland have no objection to the proposal subject to conditions relating to the provision of a new roundabout and limiting the maximum amount of office space within the development to 12,000sq.m. They also advise that the maximum number of residential units shall not exceed 200. Further conditions would also be required relating to lighting, landscaping, drainage, crash barriers, match day signage, submission of a Travel

Plan/Transport Management Strategy and the de-trunking of a section of the A82 westbound off-slip.

- 4.4** Glasgow Airport Safeguarding has no objection to the proposal. However, they have identified that the development could conflict with safeguarding criteria and therefore require any planning permission granted to be subject to appropriate conditions in order to avoid any issues arising.
- 4.5** Scottish Natural Heritage has no objection to the proposal but recommend that a great crested newt survey is undertaken. This should be done prior to any detailed permission being granted or construction work on site commencing. Pre-construction update surveys should also be undertaken with regard to bats, otters, water vole and badgers. Further consideration will also need to be given to the landscape and visual impact due to the location of the development and the fact that it is a 'gateway' to Loch Lomond and the Trossachs National Park.
- 4.6** Historic Environment Scotland does not object to the proposal. However they advise that the proposals would have an affect on the setting of category A listed, Dalmoak House. The development should therefore be designed to minimise any potential impacts on Dalmoak House as a result of the location of the football stadium and any other large structures such as floodlights or tall buildings.
- 4.7** West of Scotland Archaeology Service have no objection subject to a condition which requires the submission of an archaeological mitigation strategy.
- 4.8** Scottish Environment Protection Agency has no objections subject to conditions which require the submission of an updated Flood Risk Assessment and that a floodplain avoidance approach is adopted.
- 4.9** Police Service of Scotland have not raised any concerns with the proposal at present but note that this position could change once a detailed design has been prepared.
- 4.10** RSPB Scotland have no objection to the proposal subject to conditions relating to appropriate mitigation measures, screening, production of a Habitat Management Plan, pollution control and that any vegetation clearance is undertaken out with the months March – August.
- 4.11** Scottish Water and Sportscotland have no objection to the proposed development.
- 4.12** Network Rail has no objection to the proposal subject to conditions relating to fencing, lighting, noise and drainage. In addition, they note that consent may be required in order to undertake work which would or could impact on Network Rail property.

- 4.13** West Dunbartonshire Council Economic Development Service broadly supports a new stadium facility and in particular, the community football/sports pitches being proposed for Dumbarton Football Club at the Young's Farm site. This would allow the existing stadium site at Castle Road, to be redeveloped in a way that would take account of the adjacent historic Dumbarton Rock and Castle and the waterfront setting. However, they raise concerns regarding the housing development that is proposed to finance the community sports hub, in terms of the large number of units anticipated and their location on greenbelt land. Ideally it would be preferable for such enabling development to take place on a brownfield site.

In the event that housing was viewed as acceptable to support the proposal, the Service has real concerns that no guarantees are evident to demonstrate that the funding secured from the housing development will be directed to delivering the new stadium and community facilities in their entirety.

A further concern is the site's location on the edge of the town with poor connections to the town centre and the potential for an increase in car trips to and from the new stadium facility. The proposal would require to ensure where possible, that pedestrian connections to public transport points and the town centre were improved and well signposted.

## **5. REPRESENTATIONS**

- 5.1** A total of 24 representations have been submitted in relation to this application with 7 objecting to the proposal and 17 supporting the proposal. The objections include representations from Bonhill and Dalmonach Community Council and Silverton and Overtoun Community Council. The grounds of objection are summarised as follows:

### Housing and Green Belt Issues

- The development would be on green belt land and there is no need for a stadium or houses on this site and it will spoil the character of the area, detracting from the natural environment. There is a presumption against this type of development at this location;
- This land should be protected and retained for agriculture use;
- There is no specific mention of housing as enabling development. There is no requirement for additional housing release and it would purely be a funding mechanism;
- There is no justification for housing at this location and the principal benefactors of the proposal will be the owners of the football club;
- The proposed LDP2 Main Issues Report's preferred option is not to allow residential development to enable Dumbarton Football Club to relocate; and
- One of the reasons for the move is that the current stadium is too close to housing and yet they are proposing to build housing right next to the new stadium.

### Proposed Stadium Development

- Dumbarton Football Club does not need a stadium of this size so it is unnecessary and the existing stadium is adequate;
- It has not been demonstrated that there is any requirement for additional community facilities;
- The development is unlikely to be viable or deliverable; and
- No facilities for sports other than football are being provided.

### Access and Infrastructure

- There is a lack of street lighting on Renton Road and it will require to be upgraded which may raise ownership issues;
- There is no satisfactory disabled access to the site from Dalreoch Railway Station and an improved footbridge should therefore be installed;
- Potential requirement to upgrade existing road junctions; and
- The development will rely on use of Renton Road and will conflict with the daily movement of cattle on Renton Road.

### Connectivity

- The site is poorly connected to the surrounding area and encourages use of cars and is therefore not sustainable and does not reduce carbon generation. This will increase traffic and congestion on Renton Road and the surrounding area;
- The site has poor pedestrian links and will not encourage people to walk to/from the site. The pedestrian access links are therefore inadequate for a development of this scale; and
- The core path routes serving this site are not suitable to be used by school children.

### Economic Issues

- The development will create little full or part time employment opportunities; and
- It will not contribute to the regeneration of Dumbarton.

### Environmental Concerns

- The development will result in a loss of wildlife habitat and species;
- The development site is at risk of flooding;
- The development will result in increased light and noise pollution; and
- The development will be affected by odours from the neighbouring farm.

**5.2** The letters in support of the application are primarily from local residents and include one from the Scottish Football Association. The grounds of support are summarised as follows:

- The proposed development would improve the finances of Dumbarton Football Club and allow them to improve the team. The relocation, larger stadium and improved financial situation would also assist with developing the fan base of the club;

- The proposal is much needed and would provide better community facilities, encourage participation in sport and promote good health and better lifestyles;
- A larger football stadium could attract more people and boost the local economy;
- The proposal would remove pressure to build on other greenfield sites;
- The relocation of the football stadium from its current location would allow the Castle Road site to potentially be redeveloped;
- The enabling development is necessary to prevent the club being saddled with debt;
- The economic and social benefits of the proposal support overcoming any concerns about developing on a green belt site; and
- The new facilities will benefit local grass roots football clubs.

## **6. ASSESSMENT AGAINST THE DEVELOPMENT PLAN**

### Clydeplan (2017)

- 6.1** The approved strategic development plan, Clydeplan, is currently the subject of a legal challenge in the Court of Session with a specific focus on the housing strategy and housing land requirement of the Plan. At the time of writing this report, the hearing into the legal challenge had recently been concluded and the judgement of the Court of Session is currently awaited. Clydeplan has a vision for a compact city region and a spatial development strategy based on a development corridor running west to east along the River Clyde and the M8 corridor. The significant reserves of vacant and derelict land within the city region area provides an opportunity to recycle previously used land and maximise the opportunities for sustainable travel between work and home. The application site is located out with the strategic development corridor and is therefore not a preferred location for significant levels of residential development.
- 6.2** Schedules 9 and 10 demonstrate that there is an indicative surplus when the private sector housing land supply is compared with the housing land requirement at both local authority and housing market area levels. As a result, there is no requirement for any strategic release of land for private housing within West Dunbartonshire. The residential element of the proposal does not support the vision and spatial development strategy contained within Clydeplan. Therefore, the principle of residential development at this location would not be an acceptable departure from the Strategic Development Plan and the criteria contained in Box 2 of Diagram 10. The proposal is contrary to Clydeplan.
- 6.3** Policy 14 seeks to ensure that the Greenbelt objectives set out within Clydeplan are achieved. The proposal, as a whole, would not be in accordance with several of these objectives, such as, directing planned growth to the most appropriate locations and protecting and enhancing the quality, character, landscape setting and identity of the settlement. Therefore, the proposal is contrary to Policy 14 of Clydeplan.

West Dunbartonshire Local Plan 2010

- 6.4** Policy GB1 seeks to preserve the landscape character of the green belt by specifying a general presumption against development other than that falling into certain specified categories. The proposal as a whole does not accord with any of these criteria and is therefore contrary to this Policy. Policy RD1 states that preference will be given to residential development on brownfield sites within the urban area rather than on greenfield land. As this site is a large greenfield site located within the green belt, the proposal is therefore contrary to Policy RD1.
- 6.5** The sites specified in Schedules H1 and H2 represent the main opportunities for private sector housing, with Policy H2 stating that if additional housing land needs to be identified, further sites will be brought forward with a preference given to sites on brownfield land. As the site is greenfield and not listed in either schedule, the proposal is contrary to Policy H2. Policy GD1 sets out development control criteria for the assessment of all new development and Policy R3 encourages the development of commercial sports facilities within the urban area and subject to the considerations contained in Policy GD1. The proposal is considered contrary to Policies H2, GD1 and R3 for the reasons detailed in Section 7 below.
- 6.6** Policy E9 states that development within the green belt will have particular regard to the landscape character and distinctiveness of the area and its surroundings, with measures being proposed to minimise adverse impacts on the landscape character of the green belt. Proposals which are detrimental to the landscape character will not generally be supported. Due to the potential footprint of the development, it will have a detrimental visual impact on the green belt at this location and is contrary to Policy E9.
- 6.7** The application site is adjacent to the River Leven which is designated as a local nature conservation site and under Policy E3A, proposals should not have an adverse effect on the integrity or character of a local nature conservation site. Policy E3C states that the Council will seek to protect and enhance the River Leven fisheries resource. Subject to appropriate controls and mitigation measures, it is considered that the proposal would comply with these policies.
- 6.8** Policy T1 promotes sustainable access and the adoption of Green Transport Plans in order to reduce road traffic and Policy T4 relates to the accessibility of new development, requiring new developments to integrate with walking, cycling, and public transport routes. Priority should be given to the positioning of footpaths, cycle ways and bus stops at the main entrances to developments or within residential areas. The proposal does not promote sustainable access and is not well connected to the existing urban area. It is therefore contrary to Policies T1 and T4.
- 6.9** Policy F1 states that the Council will resist development that is likely to increase the risk of flooding or is located within the functional flood plain. Policy F2 requires all new developments to incorporate appropriate sustainable drainage measures. Subject to appropriate controls and

mitigation measures, it is considered that the proposal would comply with these policies.

- 6.10** The principle of a new stadium development, which contains a significant residential element at this location, is not supported by the adopted local plan or the strategic development plan. The application is therefore contrary to policies GB1, H2, RD1, GD1, R3, E9, T1 and T4 of the adopted local plan and Policy 14 and Box 2 of Diagram 10 (which relates to the criteria which requires to be met to justify a departure from the strategic development plan) of Clydeplan.

## **7. ASSESSMENT AGAINST MATERIAL CONSIDERATIONS**

### West Dunbartonshire Local Development Plan (LDP) Proposed Plan

- 7.1** On 27 April 2016, the Planning Committee took a final decision not to accept the Local Development Plan Examination Report recommended modification in respect of including the Duntiglennan Fields site in Clydebank as a housing development opportunity, and therefore, as a result of the Scottish Ministers' Direction, the Local Development Plan will remain unadopted. All other recommended modifications of the Examination Report have been incorporated into the West Dunbartonshire Local Development Plan, which will retain Proposed Plan status. The Council has received legal opinion that the Proposed Plan including the accepted modifications and the Examination Report continue to be a material consideration in the determination of planning applications.
- 7.2** Young's Farm is identified as a 'Changing Place', having been chosen as Dumbarton Football Club's preferred site for following consideration of a number of sites. The development as a whole is not supported by this section of the Proposed Plan (2016) as the Plan did not identify the site as suitable for residential development. Young's Farm is in the green belt and that designation is not changed by the Proposed Plan.
- 7.3** The Plan does however support the football club investigating the suitability of this site further, with particular regard given to technical issues such as access and flooding. Environmental considerations including the impact on the River Leven's nature conservation value, and landscape and visual impact were also required to be considered.
- 7.4** The Proposed Plan also states that any development of a football stadium and community facility at this location should be based on minimising the intensity of the built development, integrating as much as possible, including any enabling development, within the stadium building, and setting it within an enhanced landscape setting. Whilst a football stadium in principle is acceptable, the proposed area for residential development would intensify development and significantly increase the development footprint. The current proposal is not what was envisaged for this site in terms of the development strategy of the Proposed Plan.

- 7.5** The development strategy also indicated that the only enabling development that would be appropriate for the site would be in relation to uses such as a hotel, events/conferencing facilities and sports related uses such as a gym and sports pitches. Preference was for any built development to form part of the stadium, including enabling development. Retail development, unless ancillary to the operation of the football club would not be supported on this site and it would be a requirement of any proposal that the football stadium is developed and operating prior to any enabling development operating.
- 7.6** Policy DS2 restricts development out with the urban area to uses which support the countryside. It is considered that the development proposal does not accord with the criteria set out in Policy DS2 and does not meet the triggers for housing release identified within Policy BC1 as there is no identified shortfall in the most recent housing land audit. The proposed site is not an identified housing site in terms of Policy BC2 and is therefore also contrary to Policies DS2, BC1 and BC2.
- 7.7** Policy DS3 requires that significant travel generating uses are located within 400 metres of the public transport network and include measures to ensure that the development is easily accessible by active travel or sustainable means of transport. Due to the remote nature of this site and poor links with the surrounding urban areas, the proposal is contrary to Policy DS3.
- 7.8** Policy DS6 states development will not be supported where it would have a significant probability of being affected by flooding or increasing the risk of flooding elsewhere, and requires SuDS to be included, where appropriate in developments. Subject to appropriate controls and mitigation measures, it is considered that the proposal would comply with this policy.
- 7.9** Policy GN2 requires development to follow an Integrating Green Infrastructure approach from the outset by incorporating SuDS, open space, paths and habitat enhancement at a level proportionate to the scale of development and in accordance with relevant Planning Guidance (provided via the Our Green Network Guidance). Policy GN3 requires that the integrity of the green network assets is maintained. Subject to appropriate controls and mitigation measures, it is considered that the proposal would comply with these policies.
- 7.10** Policy GN4 indicates development that would have a significant adverse impact on the landscape character will not be permitted. Due to the potential footprint of the development which includes a large residential area, it will have a significant adverse visual impact on the green belt at this location and is contrary to Policy GN4.
- 7.11** Policy SD1 states that development should avoid adversely affecting the road network by complying with relevant standards, avoiding unacceptable congestion and providing or contributing to necessary improvements. In order to serve the development proposed, significant upgrades and alterations to the surrounding road network are required. Although the applicant has indicated a willingness to undertake any necessary access and road improvements to ensure suitable access to the development, the Council's

Roads Service have raised concerns with the information submitted and recommend refusal of the application. Therefore the proposal is contrary to Policy SD1 and this is addressed further in Section 7.26-7.28.

#### Main Issues Report

- 7.12** This consultation document is the first phase in the preparation of the second Local Development Plan for the area and it went out for consultation between June and September 2016. It represents the up to date position of the Council on various sites, including Young's Farm. The preferred option for Young's Farm is not to allow residential development to enable the relocation of Dumbarton Football Club. There is currently no requirement for significant additional housing land and it would be difficult to provide a satisfactory residential environment and a successful place connected to the existing built form. Young's Farm will remain within the Greenbelt and the relocation of the stadium will continue to be supported in line with the provisions established in the Proposed Plan (2016). The responses to the MIR supported the preferred option. The Council's responses to these representations received to the MIR will be considered by Planning Committee on 21 March 2018.

#### Scottish Planning Policy (SPP)

- 7.13** SPP states that the planning system should be plan-led, with plans being up-to-date and relevant. SPP's identified outcomes include supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places, reducing carbon emissions and helping to protect and enhance our natural and cultural assets and facilitating their sustainable use. SPP sets out how these outcomes should be delivered on the ground. By locating the right development in the right place, planning can provide opportunities for people to make sustainable choices and improve their quality of life. As a policy principle, the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost.
- 7.14** In the context of development planning, SPP sets out that local development plans should describe the types and scales of development which would be appropriate within a green belt. The development as a whole is not supported by SPP or the development plan. In particular, the housing element of the proposal is not an appropriate form of development at this green belt location since it is not well connected to the nearby settlements and is therefore not a sustainable form of development. It is likely to increase reliance on the use of cars and is not the right development for this location. In addition, the housing element will substantially increase the development footprint which will have a detrimental visual impact on the landscape. Consequently the development is not considered to comply with SPP.

#### Background

- 7.15** The vision of Dumbarton Football Club is to be successful at the highest level of football in Scotland at which it can be both financially viable and sustainable. The Club also wishes to play a wider role in the community and

contribute to health, social well-being and the economy. To achieve this, the Football Club considers it necessary to relocate to a new site which would allow a new and larger stadium to be built. The Club believe that the existing stadium is too restrictive in terms of increasing crowd capacity, maximising non-match day income and the integration of training facilities. In terms of the football clubs in the First Division in 2017/18, Dumbarton Football Club had the lowest capacity - 2,020 supporters could be accommodated in the stadium compared to 11,904 supporters for Dunfermline Athletic. Also at present, the existing stadium provides little input or facilities for community use. A new community “sports hub” would allow Dumbarton Football Club to build football and non-football revenues and contribute to the availability, accessibility and quality of sporting facilities in the local area and this objective is to be supported.

- 7.16** At the outset the Club undertook an extensive site search in the Dumbarton area to find a site which would meet their objectives. As part of the relocation requirements, they sought a site which would allow them to build a new stadium and to construct community sports facilities which could be used by the club for training. In addition, they sought to provide better facilities for the supporters and incorporate some enabling uses into the development to support the financing of the stadium and increase their non-football revenue base. At that time, it was envisaged that these enabling uses might include a hotel, events/conferencing facilities and sports related uses such as a gym and sports pitches. The site at Young’s Farm was established as the best site to meet the above requirements.
- 7.17** Through the site search process over the last 5 years, DFC have engaged extensively with the Planning Service with various submissions to the last Local Development Plan review process which resulted in the Proposed Plan being supportive of investigating a new stadium for DFC at Young’s Farm. At that time, the new stadium was to be funded by the sale of their existing site on Castle Road together with limited enabling development on the new site including a hotel, and events/conferencing facilities and sports related uses such as a gym, and sports pitches. Following further detailed analysis on how much the stadium would cost and how the relocation could be financed, it was found that the value associated with the existing site was significantly below what was needed to fund the build of a new stadium in its entirety. The outcome of this process was that the new stadium development includes residential development at the Young’s Farm site.

#### Enabling Residential and Other Development

- 7.18** The proposal includes a total of 11 hectares of land allocated for housing which the applicant has indicated would accommodate approximately 200 houses. No details of the final number, or layout of the housing has been provided at this planning in principle stage. The applicant argues that the large extent of housing land is necessary in order to deliver the new stadium. The application is accompanied by a financial sustainability report which identifies that the housing element of the proposal would generate sufficient revenue to cover the cost of the stadium development. Dumbarton FC have estimated that the total cost of the stadium development, sports pitches,

infrastructure and landscaping works would be approximately £13million. Money raised from the sale of the housing land would be used to finance the development. Any additional revenues generated from the ancillary uses and facilities on site would be used to fund and operate Dumbarton FC, allowing a cost neutral development for Dumbarton FC.

#### Phasing of the Development

**7.19** When the site was identified in the Proposed Plan, it was a requirement for the football stadium to be operational prior to any enabling development. Nonetheless, it is likely that the housing land will be sold first in order to finance construction of the new stadium. Whilst the sale of any land for housing could be subject to phasing restrictions, it is likely that there will be pressure for housing to form an early phase of the development. The design selected for the stadium means that it could be built in phases and it is likely that the pitch and main stand would be constructed in the first phase. Once the pitch and main stand were completed, the stadium could be operational with the construction of the terracing or second stand following in later phases. However, ensuring that the complete stadium is built is more difficult to achieve. In planning terms it would be reasonable to require the football stadium to be operational before any houses are occupied.

**7.20** Due to the large extent of housing land included within the application and the manner in which the development is to be funded, it is unlikely that the stadium would be completed before any of the proposed housing is occupied since the money generated from the housing element of the proposal will fund the stadium development. Once the housing development commences, it would be very difficult to prevent occupation of the houses and by that time, the precedent of housing on site would be established. The design of the stadium would allow it to be constructed in phases and although the phasing of the whole development could be controlled to an extent, there is a risk that only part of the stadium is built, thus reducing the cost of the development but not necessarily reducing the number of houses that are to be constructed.

#### Existing Football Stadium Site at Castle Road

**7.21** The existing football stadium was opened in 2000 and consists of a single stand with a capacity of 2020. Originally, it was intended that the sale of their present stadium site would fund the new stadium at Young's Farm together with some commercial enabling development. However as outlined above, this would not generate sufficient funds to cover the costs associated with the construction of a new stadium development. It should be noted that proposals for the existing stadium site do not form part of this application. It is still the intention of the Club to sell the existing site for housing, once the new stadium is operational, however any income generated would not be used for the new stadium development. DFC have indicated that they are willing to implement the findings of the Charrette report for the Castle Road site in terms of any future development proposals and this could be controlled through a legal agreement and/or appropriate planning conditions concerning the development of that site, once an application is submitted.

### Location and Amenity

- 7.22** When considering the suitability of any site for housing, it is important to determine whether it is a sustainable location which does not undermine the strategic focus of urban regeneration and brownfield redevelopment in terms of national and local planning policies. There is currently no requirement to release greenbelt land for housing in Dumbarton where the redevelopment of brownfield land continues to be the focus and priority. The proposed location for a significant housing development is not supported by the adopted local plan or Proposed Plan due to its green belt location. Therefore the site has not been identified as a suitable housing location through the local Development Plan process. It is not viewed as a sustainable location for a housing development as it has a poor relationship with the existing urban areas. It is a remote site which is not well linked to either Dumbarton or Renton and the site would be overly reliant on the use of vehicles rather than encouraging more sustainable forms of travel. Although bus stops could be provided on Renton Road, it is unlikely that any service buses would enter the site. Consequently, the distance to the nearest bus stops (over 600m from the proposed housing area) and railway station (over 900m from the nearest housing area) are likely to discourage use of public transport.
- 7.23** There is one single main vehicular access to the football stadium and associated commercial uses and housing development. Therefore, in order to access the houses, it will be necessary for vehicular traffic to share the access with the football stadium and for residents to drive past the stadium to reach their house. On match days, this could result in traffic issues and delays for residents attempting to access or depart from their houses. Whilst the delays will only occur at certain times, the relationship with the football stadium and the shared access is not acceptable from a housing development perspective and the disruption will detract from the residential amenity of any future residents. In addition, it is noted that one of the reasons for relocating is the relationship with adjacent housing at the current stadium site on Castle Road which also has only a single vehicular access. The current proposals seek to replicate the relationship with housing being located in close proximity to the stadium and the site served by a single vehicular access.

### Landscape and Visual Impact

- 7.24** The two largest elements of the development proposals are the stadium/associated community facilities and the area set aside for residential development. It is important to consider whether these two elements integrate with the immediate surroundings. The stadium by its very nature would be the largest structure and therefore the single most visible element of the proposal. By incorporating as much of the development within or close to the stadium, as recommended by the Proposed Plan, the built footprint of the development would be reduced, minimising its impact on the landscape and surrounding area. It would also leave a considerable amount of land available throughout the site for landscape improvements.
- 7.25** However, the residential development is not constricted to the confines of the stadium and will have a significant visual impact on the landscape. There is now less space for landscape improvements in order to reduce the visual

impact of the development. The increased footprint of the development due to the housing proposals, would have a greater visual impact and have a detrimental impact on the landscape, detracting from the setting at this location. This would be particularly evident when viewed from the nearby A82 which is one of Scotland's key routes for tourists heading north. The application does not demonstrate that the development will have a minimal visual impact and avoid impacting unacceptably on the landscape at this location. Overall, the scale of the built development footprint is too large at this location as it leaves less space for landscape improvements and it will detract from the landscape, thus having an unacceptable visual impact.

#### Transport and Access

- 7.26** Significant upgrade works to the surrounding road and footpath network will be required to access the development. Access to the site will be from a roundabout on the A82 slip road. Part of the slip road will have to be detrunked to allow traffic flow in both directions and responsibility for this section of the road would need to be transferred from Transport Scotland to the Council. Elsewhere, significant improvements are needed to Renton Road where a new signalised junction is proposed. Further alterations required on Renton Road include the provision of a 3m wide footpath along its full length, provision of pedestrian crossing points, installation of bus stops and the addition of street lighting. An upgrade of the secondary access/emergency access to the site will also be required. Due to the railway line which is adjacent to the site, up to four new pedestrian bridges/structures are required to ensure that there is adequate pedestrian/cycle access. In addition, Transport Scotland also state that the amount of office space within the development must not exceed 12,000sq.m and that the maximum number of residential units on site must not exceed 200.
- 7.27** The applicant has intimated a willingness to undertake any upgrades that are required to address the concerns of the Council's Roads Service and Transport Scotland. The Council sought independent advice concerning the transport information that has been provided in support of the application and there are concerns with the methodology used and the associated transport modelling. Of particular concern, is the lack of match day analysis and the corresponding impact on the road network. Consequently, there is scope for the proposed development costs to increase. In addition, some of the upgrade works that would be required are not located within the red line boundary of the planning application and could involve substantial land which is not owned by the applicant and/or require permissions from third parties such as Network Rail. The acquisition of additional land if required, could further increase development costs. The application site has only limited access to the public transport network and does not encourage or promote active travel. The nearest bus stop and railway station will be over 400m from the housing and this distance does not promote use of public transport or active travel and is not in keeping with the principles of SPP in relation to significant travel generating uses. As a consequence of the above omissions and outstanding issues, the Council's Roads Service object to the proposed development as these matters are fundamental to the development under consideration.

- 7.28** At present, the Financial Sustainability Report has made certain assumptions about the cost of the development and the extent of work required to upgrade the existing road network. However, the extent of upgrade works required, such as provision of a 3m wide pedestrian and cycle footway on Renton Road, lighting and up to four structures over the railway, are likely to increase development costs, with much of the works required being located outwith the site boundary. This could impact on the viability of the development and potentially the number of houses required.

#### Historic Environment

- 7.29** There are no listed buildings or structures within the application site. However, the application site lies in an area of archaeological potential based on the presence of recorded sites and finds in the surrounding landscape. The major issue is likely to be the potential for the area to produce material associated with a medieval manor house occupied by Robert the Bruce. An extensive programme of archaeological works would be required in order to address this issue. If the presence of surviving deposits associated with Robert the Bruce were discovered then it is likely that they would be considered of national importance, and could merit being preserved in situ. However, it is accepted that this matter could be dealt with through a planning condition.

#### Ecology

- 7.30** It is recommended that protected species surveys are completed no more than 18 months prior to the submission of an application and the surveys submitted in support of the application are now more than 18 months old. Having consulted Scottish Natural Heritage, they advise that pre-construction surveys should be carried out for bats, otters, water vole and badgers as well as a great crested newt survey before any construction work can commence on site. As part of any detailed application, it would be expected that up to date species surveys, including a great crested newt survey, would be provided for consideration and this could be addressed through a planning condition.

#### Flooding and Drainage

- 7.31** The development is adjacent to the River Leven and parts of the site are known to be at risk of flooding. As a result, the indicative layout has been designed to avoid placing any buildings within the area of land which is at risk of flooding. Only the sports pitches associated with the development will be located within the potential flood zone. SEPA have raised no objection, but have advised that a further flood risk assessment will need to be undertaken prior to submission of a detailed application. They have also advised that they are unlikely to support development which involves land raising within the floodplain. Sustainable urban drainage proposals will be required as part of any detailed proposals.

#### Proposal of Application Consultation Report

- 7.32** As the proposal constitutes a major development, statutory pre-application consultation was carried out prior to submission of the application. A public consultation event was held at the existing Dumbarton Football Club site in

November 2016. A statutory notice was published in the local press advertising the public event and the submission of the proposal of application notice. The applicant has submitted a pre-application consultation statement which summarises the responses that were received in both written and verbal form. The report indicates that feedback was received from approximately 45 people. The responses were mixed, with positive feedback in relation to the ambitions of the club and the provision of enhanced facilities. However, concerns were raised with regard to accessibility, the capacity of the proposed stadium, developing within the green belt and the financial viability of the development.

#### Pre determination Hearing

- 7.33** Under the terms of Section 38A of the Town and Country Planning (Scotland) Act 1997 (as amended) applications for major development which would be significantly contrary to the development plan require a pre-determination hearing, whereby applicants and any persons who have made representations are given the opportunity to appear before and be heard by a Committee. This takes place at the Planning Committee, but as the application requires to be referred to, and determined by the full Council, elected members who are not part of the Planning Committee have been invited to the Committee in order to observe the pre-determination hearing.

## **8. CONCLUSION**

- 8.1** The Council support the vision of DFC in seeking to provide a new community sports hub for Dumbarton and create new, modern, quality football facilities to allow DFC to be successful at the highest level of Scottish Football. The Proposed Plan is supportive of a new football stadium being investigated at this site. However, the enabling development proposed includes a significant housing development which would be contrary to green belt and housing policies of Clydeplan, the adopted local plan and Proposed Plan, where there is a preference to direct new housing development to brownfield land. There is no requirement for additional land to be made available for housing within Dumbarton to fulfil the housing land supply targets within West Dunbartonshire.
- 8.2** The new football stadium is now to be funded solely by the sale of land for housing at Young's Farm. Whilst there are planning and legal safeguards available to ensure that the funds raised from the sale of the land for housing are used for the new stadium, these mechanisms are unlikely to be either acceptable to the applicant or robust enough to ensure that a complete football stadium is achieved.
- 8.3** There will be one main vehicular access into the site for both the football stadium traffic, residential and other development. However, the submitted traffic information fails to provide detailed analysis of how the surrounding road network will function, particularly on match days. This is necessary in order to determine if the existing junctions and parts of the local road network can accommodate the development and/or will require upgrading. This is a

fundamental omission in terms of determining whether the uses are acceptable at this location and the viability of the proposal. In addition, significant upgrade works will be required on land which is outwith the application site boundary.

- 8.4** Whilst the improvement of local sporting facilities and a new stadium for Dumbarton FC are supported, the benefits are not sufficient to justify the release of additional land in the green belt for housing. There is no requirement to provide additional land for housing at this location and there are no material considerations which outweigh the terms of the development plan and would justify a departure in this instance.

## **9. REASONS FOR REFUSAL**

- 1. The site is in the green belt and the development is not in accordance with Policy 14 and Box 2 of Diagram 10 in Clydeplan as no further sites are required to be allocated in order to fulfil the housing land supply targets within West Dunbartonshire.**
- 2. The site is in the green belt and remote from the existing urban area. It is an inappropriate location for housing development and the proposal is therefore contrary to the principles of Scottish Planning Policy.**
- 3. The site is remote from the existing urban area and is contrary to policies GB1, RD1, H2 GD1, R3, E9, T1 and T4 of the adopted West Dunbartonshire Local Plan 2010 in terms of being housing in the green belt. It is an inappropriate location and would set an unacceptable precedent for the release of further housing land within the green belt.**
- 4. There is no requirement for additional green belt land to be identified to meet the strategic housing requirement. The proposal is therefore contrary to policies DS2, DS3, BC1, BC2 and GN4 of the West Dunbartonshire Local Development Plan (Proposed Plan) in terms of housing development in the green belt which is an inappropriate location and would set an unacceptable precedent for the release of further housing land within the green belt.**
- 5. The proposal is not in accordance with the specific requirements of the relevant 'Changing Place' section contained within the West Dunbartonshire Local Development Plan (Proposed Plan).**
- 6. The development site is remote and is not easily accessible by active travel or sustainable means of transport and insufficient information has been submitted to demonstrate that the existing road network can accommodate the development. The proposal is therefore contrary to policies T1 and T4 of the adopted West Dunbartonshire Local Plan 2010 and policy DS3 of the West Dunbartonshire Local Development Plan (Proposed Plan).**

**Peter Hessett**  
**Strategic Lead - Regulatory**  
**Date: 8<sup>th</sup> March 2018**

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**Appendix:** None

**Background Papers:**

1. Application Forms and Plans
2. Supporting Documents
3. Consultation Responses
4. West Dunbartonshire Local Plan 2010
5. West Dunbartonshire Local Development Plan  
Proposed Plan 2016
6. Clydeplan
7. Scottish Planning Policy

**Wards affected:** Ward 3 (Dumbarton)

Date: 8 March 2018

**DC17/140**

**Mixed use development  
incorporating a football  
stadium and associated uses  
(including restaurant,  
hospitality and function  
suites), residential  
development, commercial and  
tourism development, floodlit  
sports pitches, access,  
parking, and landscaping etc**

**Land At Young's Farm  
Renton Road  
Dumbarton**



## WEST DUNBARTONSHIRE COUNCIL

### Report by Strategic Lead - Regulatory

Planning Committee: 21 March 2018

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**DC17/293**      **Change of use of former school site to public open space including construction of footpath network, installation of play and leisure equipment, biodiversity landscaping, community garden with associated parking and ancillary structures at the former St Eunan's primary school site, Melfort Avenue, Clydebank by West Dunbartonshire Council.**

#### **1. REASON FOR REPORT**

- 1.1** This report relates to a proposal which is classified as Major Development. Under the terms of the approved Scheme of Delegation it therefore requires to be determined by the Planning Committee.

#### **2. RECOMMENDATION**

- 2.1** **Grant** planning permission subject to the conditions set out in Section 9 of this report.

#### **3. DEVELOPMENT DETAILS**

- 3.1** The site has been vacant since the demolition of the former St. Eunan's Primary School in 2011. The site is rectangular in shape and is 2.07 hectares. It is bounded by Melfort Avenue to the north and Montrose Street to the south. It is surrounded by residential properties on three sides and Kilbowie Cemetery shares the south-east boundary of the site. The site slopes down from north to south and has been cleared of buildings. The school boundary walls, gates and railings remain on the perimeter of the site.

- 3.2** Planning permission is sought for a community park comprising the following elements:

- community garden with associated parking area and ancillary buildings;
- 2no. wooden garden sheds;
- polytunnel, with raised planting/ growing beds (which would contain clean imported soil);
- portable chemical toilet;
- installation of children's natural play and adult exercise/ activity equipment;
- footpath network including lighting and seating areas;
- wooden sculptures and a heritage view point together with interpretation signage;
- erection of new boundary fencing/ walling;

- planting/ landscaping scheme that will define the habitat and contribute to the overall biodiversity of the site;

The proposals have been designed for community, recreation and educational use and will be maintained by the Council with exception to the community garden that will be managed through the creation of a community garden group, with assistance from the Council's Greenspace team. Following the school's demolition the presence of asbestos fibres, metals and polycyclic aromatic hydrocarbons (PAH's) within ground across part of the site were found and therefore use of the site as a community park is now proposed. Presently the site is currently inaccessible to the public until it is fully remediated. It was agreed by the IRED Committee in March 2016 that consultation should be held with the surrounding community to help the Council identify the best long term use for the site whilst addressing current contamination issues. Through early consultation events with the local community in June and October 2016, it was identified that they would like to see a variety of open space uses on the site suitable for people of all ages and abilities. Funding has been secured for the proposal through a commitment by the Council and Scottish Natural Heritage through the Green Infrastructure Fund.

#### **4. CONSULTATIONS**

- 4.1 West Dunbartonshire Council Environmental Health has no objection to the proposal, subject to conditions relating to site operational/delivery hours, lighting details, control/mitigation of dust, presence of unexpected contamination and SUDS/maintenance details.
- 4.2 West Dunbartonshire Council Greenspace has no objections to the proposal.
- 4.3 West Dunbartonshire Council Roads has no objection to the proposal, subject to conditions relating to vehicular access to parking provision for disabled badge holders, and the provision of cycling parking and way marking of cycle and DDA routes.
- 4.4 Scottish Environmental Protection Agency has no objection to the proposal
- 4.5 Glasgow Airport (Safeguarding) has no objection subject to the use of appropriate plant species scheme due to proximity of the site to Glasgow airport/flightpath and particular planting species acting as a possible bird attractant.
- 4.6 Police Scotland supports the proposal and recommends the use of robust park furniture with good natural surveillance.

#### **5. REPRESENTATIONS**

- 5.1 Four representations have been received in objection to the application and can be summarised as follows:

- Detrimental impact upon residential amenity which would result in loss of privacy and increases overlooking;
- Potential for anti-social behaviour and fly-tipping;
- Community garden/parking presents town cramming;
- Concern over protection of existing wildlife habitat;
- Inadequate parking & increase in use of Cambridge Avenue to 'through-traffic'/pollution;
- Council never took suggestion to develop park with amenities (butterfly house) or community garden;
- Size of the poly tunnel and sheds (not mentioned in pac) seems extreme and purpose unknown;
- Management of the garden not known;
- Suggest vehicular entrance and toilet is moved to alternative location;
- Concern over proposed height of fencing within growing space next to housing;
- Request regular street cleaning to prevent blockage of drains/alleviate flooding;
- Anticipate increased traffic in the area;
- Query over traffic management during construction;
- Position of generator and associated noise;
- Need to clarify how drainage is to be set up in relation to potential flooding with asbestos in the ground;
- Proposals could impact ground stability and drainage;
- Clarification on maintenance of shrubs next on boundary of properties;
- Concern as to how waste from chemical toilet is disposed;

The points of objection are addressed fully in Section 7 of the report.

## **6. ASSESSMENT AGAINST THE DEVELOPMENT PLAN**

### West Dunbartonshire Local Plan 2010

- 6.1** The site is allocated as a mixed use opportunity and uses of residential, community use and open space being identified as being acceptable in terms of Schedule GD2(6). The current proposal does incorporate both community uses and open space. Policy GD2 supports the redevelopment of vacant sites for ecological and greenspace uses. The proposal is therefore acceptable in terms of the site allocation and policy GD2.

## **7. ASSESSMENT AGAINST MATERIAL CONSIDERATIONS**

### West Dunbartonshire Local Development Plan (LDP) Proposed Plan

- 7.1** On 27 April 2016, the Planning Committee took a final decision not to accept the Local Development Plan Examination Report recommended modification in respect of including the Duntiglennan Fields site in Clydebank as a housing development opportunity, and therefore, as a result of the Scottish Ministers' Direction, the Local Development Plan will remain unadopted. All other recommended modifications of the Examination Report have been incorporated into West Dunbartonshire Local Development Plan, which will retain Proposed Plan status. The Council has received legal opinion that the

Proposed Plan including the accepted modifications and the Examination Report continue to be a material consideration in the determination of planning applications.

- 7.2** The site is identified as a 'housing opportunity.' in the Proposed Plan in terms of Policy BC2. The site was identified for housing before it was established that it cannot be suitably remediated to accommodate a residential use. Whilst the proposed use as a community park is not the identified use, it is supported by other local planning policies. Policy BC5 supports the provision of community facilities in appropriate locations. The use is considered compatible with the established residential area and is viewed as an opportunity to bring this site back into use which would enhance the area aesthetically and provide recreational and educational opportunities for the local community together with improving access and connectivity. Although the proposed use as a community park is not the identified use it is not possible to deliver housing on this site due to the contamination issue therefore the proposed use is considered acceptable.
- 7.3** The proposal is in accordance with policy DS1 which supports proposals which contribute towards successful places which include being adaptable, resource efficient, accessible, safe and pleasant. Specifically, the footpath network has been designed to be accessible for wheelchair users and so the site would be adaptable for both this reason and for its targeted users across community, recreation and education. Proposals for community self - planting and growing space are considered resource efficient and sustainable. The site benefits from natural surveillance given its surrounding residential context and together with the lighting scheme will create a safe environment. The open space and green network will enhance the area, creating a pleasant environment for the local community. Policy GN2 requires new development to follow the Integrating Green Infrastructure (IGI) approach to design by incorporating SUDS, open space, paths and habitat enhancements. The proposals endorse the terms of this policy.
- "Our Green Network" Planning Guidance 2015
- 7.4** The "Our Green Network" planning guidance provides further detail on the IGI approach referred to above and identifies existing green space assets and opportunities for enhancement and integration. The guidance recognises the former St Eunan's site as a development opportunity where the principles of the IGI approach should be applied. The site is not suitable for residential development and the proposals present an opportunity for the whole site to be used as valuable community green space. The site would link directly with Kilbowie Cemetery, one of three local green networks in Clydebank, and the landscaping proposed within the site will help enhance the habitat network and wildlife corridors. The proposals are therefore supported by the guidance.
- Remediation
- 7.5** Ground investigations carried out in 2014/15 following the school's demolition confirmed the presence of asbestos fibres, metals and polyaromatic hydrocarbons (PAH's) within the ground across part of the site. Short term remedial works by the Council included a surface pick of above ground

objects. The site was also secured and warning signage erected. A number of reports concerning the site contamination were presented to the Council's IRED Committee highlighting the nature and extent of the issue together with the consideration of options for the site's future. In addition, the Council arranged for a presentation to residents by the consultant who prepared the site investigation report and remediation strategy, to help explain the extent and nature of contamination on site and how it should be addressed.

**7.6** This has led to a comprehensive remediation strategy which has been submitted in support of the application which details the approach and methodology to remediate the site to enable it to be brought back into safe use for the public. The key actions include a 'cover system' approach and are as follows:

1. A regulating layer of clean imported subsoil brought onto site to provide a base layer over the areas of ground that are contaminated.
2. Capping with a permeable geo-textile 'no dig' layer to areas that are contaminated, finished in bright orange to provide a visual warning should the ground ever require to be excavated in the future. The geotextile layer is permeable so the site drainage will not be affected.
3. Covering the geotextile layer with clean imported subsoil/topsoil, to an appropriate compaction, the thickness of which will be determined by the area usage type i.e. play areas/ grassed areas.
4. Asbestos management and control measures will be put in place to protect the workforce and the surrounding area.

The proposed remediation strategy, including the above actions is considered to be robust and is acceptable to the Council's Environmental Health Service.

#### Residential amenity

**7.7** It is not considered that the proposed use as a community park and play/ activity areas would create adverse amenity issues for the residents of those properties that either share a boundary with the site or are in close proximity. The site is currently inaccessible, overgrown and unattractive. The proposals present an opportunity to enhance the site and surrounding area by bringing it back into use. The site is well overlooked by surrounding housing and the path network will integrate the site with the wider area. The former school walls and railings on the perimeter of the site are in varying states of repair and are proposed to be replaced by new fencing which will improve the amenity of neighbouring properties and the attractiveness of the site. Existing boundary fencing belonging to neighbouring properties will not be affected and the proposed fencing will not exceed the height of the existing. In addition to the fencing, planting is also proposed on the site boundaries which will offer an attractive screening treatment. Specific drainage proposals (a soakaway) have been developed for the southern part of the site to take account of reported water run-off from the site to the lane at the rear of the residential properties on Montrose Street.

**7.8** Due to the topography and undulating nature of the ground, a relatively level area at the north western aspect of the site (south of the 3 detached

bungalows) has been chosen for the siting of the community garden. The location benefits from a degree of shelter and an existing vehicular access point from Melfort Avenue. The access would lead to a 6 space car parking court designed to serve users of the community garden and would facilitate the transportation of gardening equipment and materials, when required. It is envisaged that the community garden and land to the east would be used as the site compound during the construction phase due to its accessibility and proximity to Melfort Avenue. A 'silenced generator' would be located in the compound and would operate during working hours to provide power to the temporary site offices and in the evenings to dry workers clothes. It is not expected that it would cause any adverse noise issues.

- 7.9** Ancillary structures to be located within the community garden comprise sheds, polytunnel and portable toilet. These elements featured in the proposals put out to public consultation at the events that preceded the submission of the planning application but their specific siting within the garden was not clearly annotated. The sheds and polytunnel are now proposed to be sited to the south of the shared boundary with 3no. bungalows that abut the North West boundary of the site. These structures will create a 'buffer' between the activity areas of the community garden and the 3 bungalows, in addition to the boundary fencing and hedging proposed. The portable chemical toilet has been relocated on the plans to the south of the parking bays in response to a neighbouring objection about its location. This will create good separation distance (over 10 metres) with the closest property at no.30 Melfort Avenue.
- 7.10** It is anticipated that a butterfly house or other wildlife habitat will be created within the site by local school pupils as part of community involvement during the construction process. The site will also be utilised by local schools and nurseries post construction for 'forest school' activities - these are typically carried out in small groups with limited numbers at any one time.
- 7.11** In considering the potential for any anti-social behaviour within the site, the Police Crime Reduction Officer's advice has been sought and following recommendations, revisions were made to the site layout in order to reduce the perception and opportunity for instances of crime. The community garden and associated parking area will be gated and accessible to key holders only in order to appropriately manage access to that area. The community garden would be similar to the community garden in Bellsmyre and the intention is that it will be managed by the community in a similar manner.

#### Site access and traffic

- 7.12** The proposal intends to make use of existing access points to the site including the vehicular access from Melfort Avenue (to access the proposed parking bays associated with the community garden) and 3 pedestrian access points. This will ensure good connectivity and accessibility for the site and surrounding area.
- 7.13** The Council's Roads Service are satisfied with the parking provision to be provided to service the community garden, subject to one of the parking bays

being designated for disability use. It is anticipated that as a local facility within the community, the majority of users will walk to (or through) the site.

- 7.14** In terms of access during the construction period, due to the topography of the site, the preferred access for the contractor will vary according to which part of the site is being developed. Concerns raised in representations, relating to the potential for subsidence, at steeper sections of the site boundary, will be assessed and managed by the contractor prior to any works commencing. No change is proposed to site levels and it is not envisaged that any subsidence issues will arise. The proposals have been designed to work with the existing site levels that would be covered by the geotextile membrane, upon which there would be a layer of clean soil, the depth of which will vary at locations, depending on the uses and planting proposed.

#### Landscaping and planting

- 7.15** Proposals include a variety of planting and landscaping to attract species and encourage biodiversity thereby contributing to the conservation value of the site and its connections with the wider area. Glasgow Airport noted initial concerns with some of the proposed plant species that produce fruit/ berries because of the potential to attract birds. These species were not considered compatible due to the increased risk of bird strike to aircraft in the area and so planting proposals have been amended to take account of this advice.

#### Representations

- 7.16** Four representations objecting to the proposals were received in respect of this application. All points 'material' to the consideration of this application have been addressed in section 7 of this report and through planning conditions in section 9 below. The balance of considerations are drawn together in the conclusion.

#### Pre-application consultation

- 7.17** The proposals were also subject to a Members Pre-application Briefing in November 2017. At the Members' Briefing, the proposed use and the remediation strategy was welcomed however issues were raised about areas outwith the site and the need for testing and treatment.
- 7.18** As the proposal constitutes a major development, statutory pre-application consultation with the public was also undertaken. A public consultation event was held at the new St Eunan's primary school on 27 November 2017 to obtain community views on the proposals for the site. A statutory notice was published in the local press advertising the public event. The key areas of discussion were parking, boundary treatment with residential properties, construction access points and location and proximity of play and exercise equipment relative to residential properties. The feedback has influenced the proposed use, design and layout of the site. In addition to this, four separate community consultation events (spanning a timeline from June 2016 – February 2017) took place with local schools and the community to identify the best long term use for the site whilst considering the contamination constraint.

## **8. CONCLUSION**

- 8.1** The proposal site is now known to have contaminants and would be unsuitable for residential development, despite the site allocation in the Adopted and Proposed plans. The site has lain undeveloped and closed to the public since the school buildings were demolished. The provision of public open space/ park is supported by the adopted and proposed plans to create an attractive and community facility. Supporting information in the form of a remediation strategy demonstrates that the site can be made safe for use as public open space/ park and the varying elements of the proposals would positively contribute to and enhance the recreation offer within the local community for all ages.

## **9. CONDITIONS**

- 1. During the period of construction, all works and ancillary operations which are audible at the site boundary (or at such other place(s) as may first be agreed in writing with the Planning Authority), shall be carried out between the following hours unless otherwise approved in writing by the Planning Authority:**

**Mondays to Fridays: 0800-1800**

**Saturdays: 0800-1300**

**Sundays and public holidays: No working**

- 2. No commercial vehicle making deliveries to or collecting material from the development shall enter or leave the site before 08:00 or after 18:00.**
- 3. No development shall take place on site until such time as details (including specific luminaire and lamp type; beam control; wattage; the use of reflectors; baffles; louvers; cowling; lux contours/distribution diagrams and columns types/colours) of the floodlights have been submitted to and approved in writing by the Planning Authority. The floodlights shall then be implemented in accordance with the approved details and shall thereafter be maintained. Any subsequent changed to their position or specification shall be subject to the prior written approval of the Planning Authority.**
- 4. Unless otherwise approved in writing by the Planning Authority, no development shall commence on site until such time as a scheme for the control and mitigation of dust has been submitted to and approved in writing by the Planning Authority. The scheme shall identify likely sources of dust arising from the development or its construction, and shall identify measures to prevent or limit the occurrence and impact of such dust. The approved scheme shall thereafter be implemented fully prior to any of the identified dust generating activities commencing on site and shall be**

**maintained thereafter, unless otherwise approved by the Planning Authority.**

- 5. The approved remediation scheme shall be carried out in accordance with its terms prior to the commencement of development unless otherwise agreed in writing by the Planning Authority. The Planning Authority shall be notified in writing of the intended commencement of remediation works not less than 14 days before these works commence on site. Upon completion of the remediation works and prior to the site being occupied, a verification report which demonstrates the effectiveness of the completed remediation works shall be submitted to and approved in writing by the Planning Authority.**
- 6. The presence of any previously unexpected contamination that becomes evident during the development of the site shall be reported to the Planning Authority in writing within one week, and work on the site shall cease. At this stage, if requested by the Planning Authority, an appropriate investigation and risk assessment shall be undertaken and a remediation scheme shall be submitted to and approved by the Planning Authority prior to the recommencement of site works. The approved details shall be implemented as approved.**
- 7. Prior to the commencement of development on site, details of the Sustainable Urban Drainage System (SUDS) and its maintenance following installation shall be submitted to and approved by the Planning Authority. The SUDS shall be designed to ensure that contaminants present on the site are not mobilised and that pollution pathways are not created. The Sustainable Urban Drainage System shall thereafter be formed and maintained on site in accordance with the approved details prior to development on site.**
- 8. Prior to the car park being brought into use, the existing vehicular access to the former school shall be altered as necessary to conform to fig.9 of the SCOTS 'National Roads Development Guide' (NRDG) 2014 (as amended).**
- 9. Prior to the community garden being brought into use, 6 parking spaces (one for disabled use) shall be constructed, surfaced and delineated on site.**
- 10. Prior to the commencement of development on site, details of cycle parking at points of interest within the park shall be submitted to the Planning Authority for approval and shall be implemented as approved.**

11. Prior to the commencement of development on site, appropriate measures to ensure that surrounding roads remain free of deleterious material at all times shall be implemented.

**Peter Hessett**  
**Strategic Lead - Regulatory**  
**Date: 21st March 2018**

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**Person to Contact:** Pamela Clifford, Planning & Building Standards Manager  
email: [Pamela.Clifford@west-dunbarton.gov.uk](mailto:Pamela.Clifford@west-dunbarton.gov.uk)

**Appendix:** None

**Background Papers:**

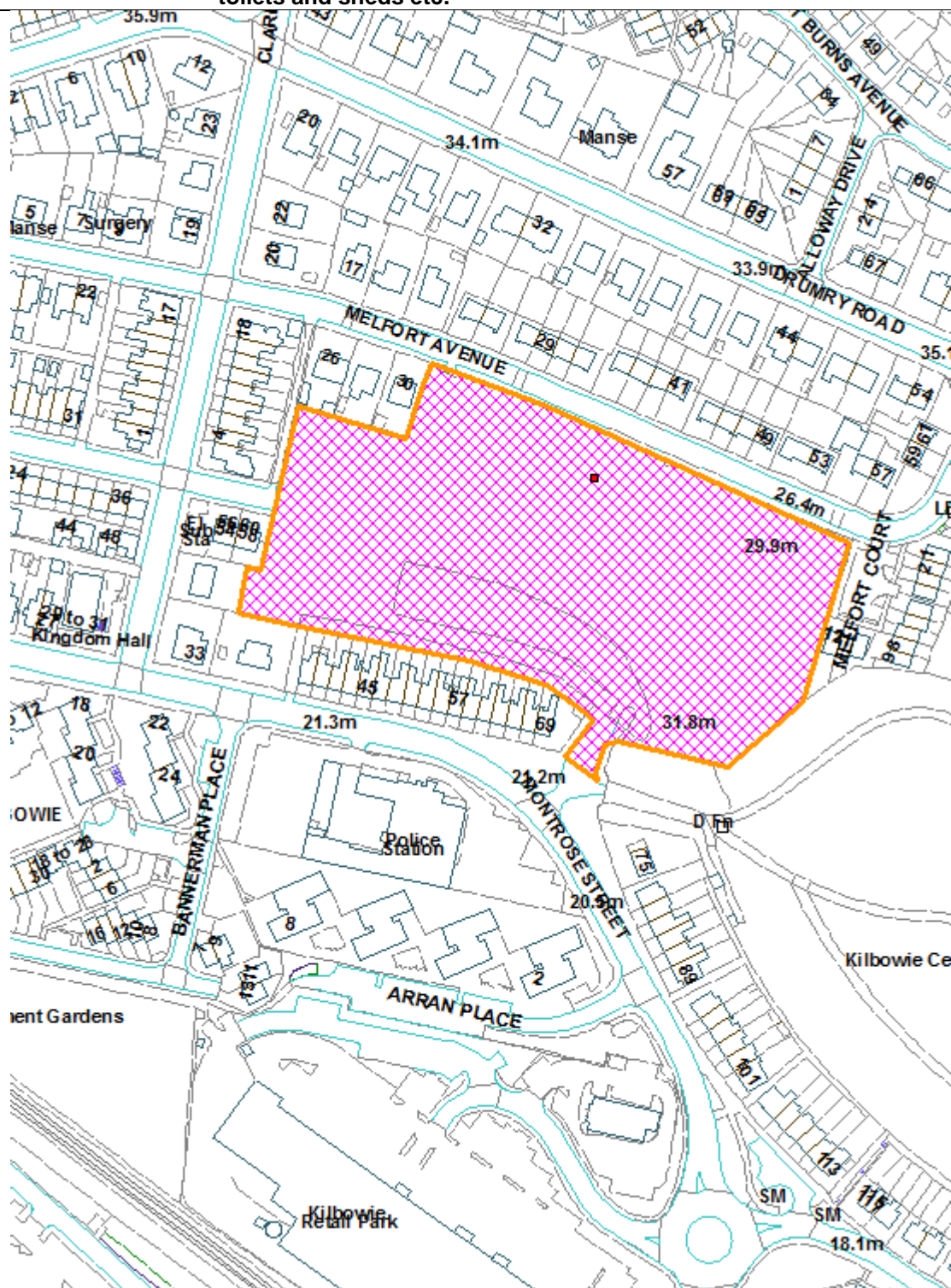
1. Application forms and plans
2. West Dunbartonshire Local Plan 2010
3. West Dunbartonshire Local Development Plan Proposed Plan
4. Our Green Network: Supplementary Planning Guidance Document

**Wards affected:** Ward 5 (Clydebank Central)

DC17/293

Use of former school site  
as public park including  
remediation of site and  
formation of new paths,  
play area, polytunnels,  
toilets and sheds etc.

Community Park  
Melfort Avenue  
Clydebank





## WEST DUNBARTONSHIRE COUNCIL

### Report by the Strategic Lead - Regulatory

Planning Committee: 21 March 2018

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**Subject: Street name for new housing development site at the former Bonhill Primary School site, Bonhill**

#### **1. Purpose**

- 1.1** To approve a new street name to the housing development site on land at the former Bonhill Primary School site.

#### **2. Recommendations**

- 2.1** It is recommended that Old School Place be approved as the preferred street name.

#### **3. Background**

- 3.1** The site is located on the land of the former Bonhill Primary School. It is bounded by Main Street to the east with the new Bonhill Primary School opposite the site. Planning permission has been granted for the erection of erect 44 flats consisting of two separate buildings, with one building facing the street.

#### **4. Main Issues**

- 4.1** The site of the former school site was well known within the Bonhill community and dates back to 1874 when the original school was first built. Given its links to the local community it was considered appropriate that reference to a school should be incorporated into the street name for the new housing development.
- 4.2** In line with the street naming policy the elected members for Ward 2 Leven and Bonhill and Dalmonach Community Council were all consulted on the above street names. No Residents and Tenants Association are active within this area. One elected member responded suggesting School Gardens was a suitable name. Bonhill and Dalmonach Community Council carried out a Facebook poll and responded with a preferred name suggestion of Old School Place.
- 4.3** Taking responses into consideration it is recommended that Old School Place fits the location and layout of the site. It also fully meets the requirements of the Street Naming and Numbering Policy.

#### **5. People Implications**

- 5.1** There are no people implications.

## **6. Financial Implications**

**6.1** There are no financial implications.

## **7. Risk Analysis**

**7.1** There are no known risks to the Council.

## **8. Equalities Impact Assessment (EIA)**

**8.1** None.

## **9. Consultation**

**9.1** As part of the Council's Street Naming Policy elected members for Ward 2 Leven and Bonhill and Dalmonach Community Council have been consulted.

## **10. Strategic Assessment**

**10.1** This proposal does not impact on any of the Council's strategic priorities.

**Peter Hessett**  
**Strategic Lead - Regulatory**  
**Date: 5<sup>th</sup> March 2018**

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**Person to Contact:** Pamela Clifford, Planning & Building Standards Manager,

Email: [Pamela.Clifford@west-dunbarton.gov.uk](mailto:Pamela.Clifford@west-dunbarton.gov.uk)

**Appendices:** None

**Background Papers:** Street Naming and Numbering policy

**Wards Affected:** Ward 2 Leven



0 10 20 30 40 50 60 70 80 90 100



1:2500/A3

drawn date

Project  
BONHILL HOUSING for  
WHEATLEY GROUP/  
CUBE HOUSING ASSOCIATION  
drawing description  
LOCATION PLAN

drawn by  
GN

date  
07.15

scale  
1:2500/A3

project no.  
pb916

dep. no.  
D(90)001

revision

drawing status



40 Berkeley Street Glasgow G5 7BW  
tel: (0141) 204 1833  
fax: (0141) 204 1844  
e-mail: e-c@elder-cannon.co.uk



**WEST DUNBARTONSHIRE COUNCIL****Report by the Strategic Lead - Regulatory****Planning Committee: 21 March 2018**

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**Subject: Street names for new housing development site at Lomondgate Area 5 by Taylor Wimpey UK Ltd**

**1. Purpose**

- 1.1** To approve new street names to the housing development site at Lomondgate Area 5, Dumbarton.

**2. Recommendations**

- 2.1** It is recommended that Glen Orchy Crescent, Glen Etive Gardens and Glenalmond Place be approved as the street names.

**3. Background**

- 3.1** The site, known as area 5, is located on land to the south of the A82 and north of the Dumbarton Golf Course which will comprise a total of 58 houses of detached and semi-detached houses being constructed. Vehicular access into the site would be through the existing Taylor Wimpey residential development to the east of the site. The main road running through that development would continue into the new site and would then form a shared surface with houses sited around the loop road and through the centre of the development, with other shared surfaces leading off.

**4. Main Issues**

- 4.1** The proposed names are in keeping with the current theme of using names of Scottish Glens within the current housing development at Lomondgate. The street names are Glen Orchy Crescent, Glen Etive Gardens and Glenalmond Place.
- 4.2** In line with the street naming policy the elected members for Ward 2 Leven and Bonhill and Dalmonach Community Council were all consulted on the above street names. No comments have been received from elected members or Bonhill and Dalmonach Community Council to date.
- 4.3** It is recommended that the above street names best fits the location and is consistent with the general theme of existing street names in the area. It also fully meets the requirements of the Street Naming and Numbering Policy.

**5. People Implications**

**5.1** There are no people implications.

**6. Financial Implications**

**6.1** There are no financial implications.

**7. Risk Analysis**

**7.1** There are no known risks to the Council.

**8. Equalities Impact Assessment (EIA)**

**8.1** None.

**9. Consultation**

**9.1** As part of the Council's Street Naming Policy the Community Council and elected members for Ward 2 Leven have been consulted.

**10. Strategic Assessment**

**10.1** This proposal does not impact on any of the Council's strategic priorities.

**Peter Hessett**  
**Strategic Lead - Regulatory**  
**Date: 5<sup>th</sup> March 2018**

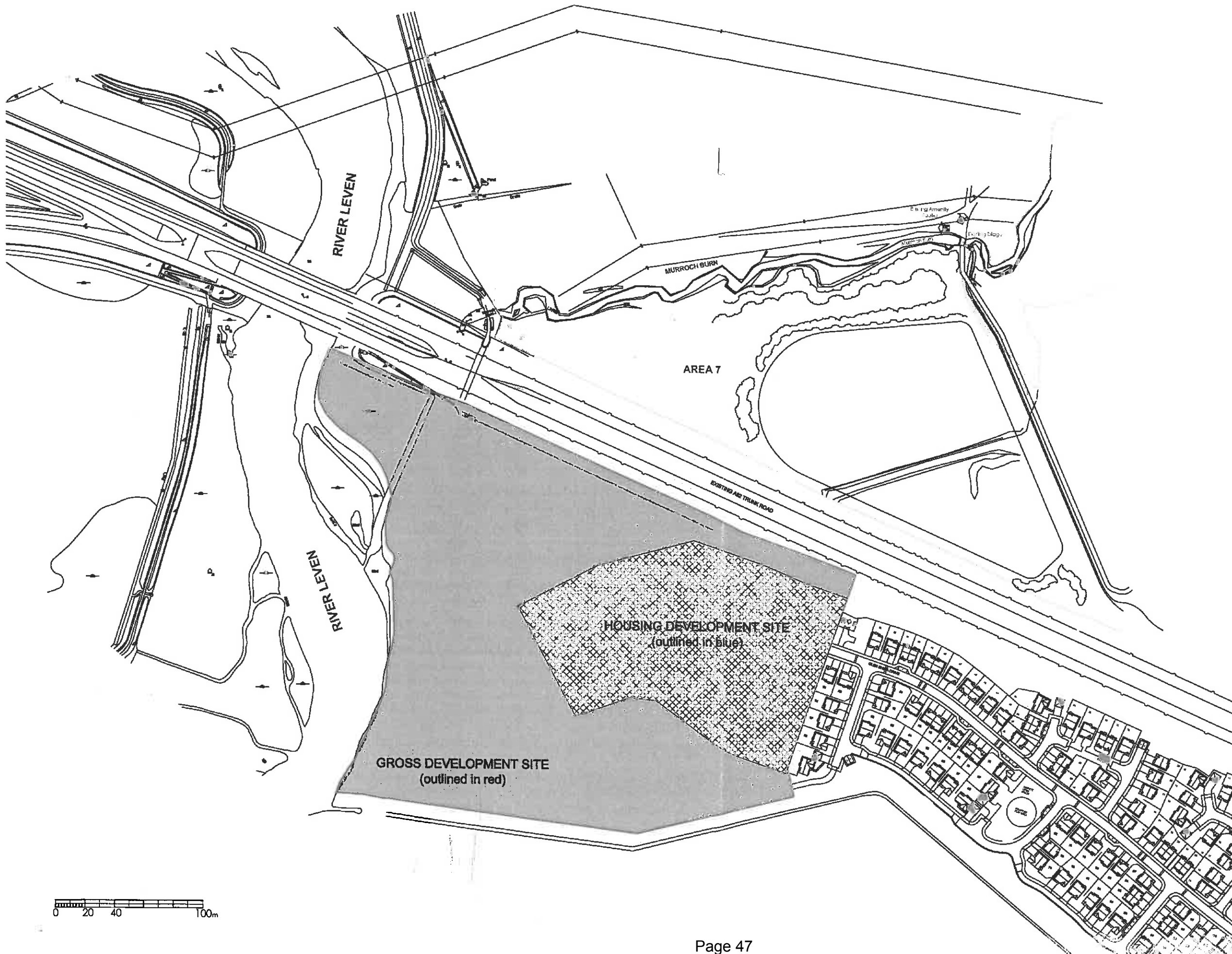
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**Person to Contact:** Pamela Clifford, Planning & Building Standards Manager,  
Email: [Pamela.Clifford@west-dunbarton.gov.uk](mailto:Pamela.Clifford@west-dunbarton.gov.uk)

**Appendices:** None

**Background Papers:** Street Naming and Numbering policy

**Wards Affected:** Ward 2 Leven



NOTES

DO NOT SCALE FROM THIS DRAWING

NOTICE TO HOUSE - PURCHASERS

Property Misdescriptions Act 1991

We hereby notify any buyer this is a working drawing & is not intended to be treated as descriptive material, in relation to any particular property or development, or any of the Specified Matters prescribed by any Order made under the above Act.

The contents of this drawing may be subject to change at any time. Alterations & variations can occur during the progress of the works without revision of the drawing. As a result of this the layout, form, content & dimensions of the finished construction may differ materially from those shown. Nor do the contents of this drawing constitute a contract, part of any contract or a warranty.

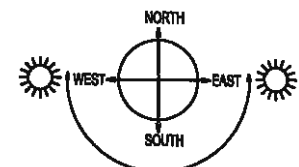
Suitable arisings from excavations provide useful engineering material for raising levels and in forming and contouring areas of landscaping. Accordingly, the finished surface levels on this development have been designed to incorporate the benefit of this material, either derived on this site, or on other GWUK developments.

**PLANNING SERVICES RECEIVED**

04 JAN 2018

PASS TO

REF. No.



REVISIONS

**Taylor Wimpey**

TAYLORWIMPEY WEST SCOTLAND  
UNIT C, GROUND FLOOR, CIRRUS BUILDING  
GLASGOW AIRPORT BUSINESS PARK  
MARCHBURN DRIVE, ABBOTSINCH, PAISLEY PA3 2SJ  
Tel: 0141 - 849 - 5500

JOB TITLE  
STRATHLEVEN,  
DUMBARTON (SITE 5)

DRAWING TITLE  
LOCATION PLAN

SCALE 1:2500 @ A3		DRAWN GO	
A3	A2	JOB NO.	CHECKED
A1	A0		

DRAWING NO. AL (0) 01	REV. -
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**WEST DUNBARTONSHIRE COUNCIL****Report by the Strategic Lead - Regulatory****Planning Committee: 21 March 2018**

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**Subject: Local Development Plan 2: Main Issues Report Consultation Responses**

**1. Purpose**

- 1.1** To inform Committee of the responses received to the Main Issues Report consultation exercise and to advise on the next steps.

**2. Recommendations**

- 2.1** It is recommended that Committee approve the Council's response to the representations received and agree to the recommended next steps for the Proposed Plan.

**3. Background**

- 3.1** A new Local Development Plan for the West Dunbartonshire is currently being prepared. The first formal stage in this process was the publication of the Main Issues Report for consultation on 30 June 2017. This was preceded by a series of consultation meetings, including all active Community Councils, all Key Agencies (Scottish Water, SEPA etc), Elected Members, developers and other organisations and other Council services. The Main Issues Report was approved for consultation by Planning Committee on 26 April 2017 for a 12 week consultation period. The Main Issues Report identified 18 policy areas that may be subject to change in the new Local Development Plan and sought views on an identified preferred option and reasonable alternatives.
- 3.2** The consultation period ran until 30 September 2017. The consultation exercise was promoted by: publication of the relevant documents on the Council's website; posts on the Council's Facebook and Twitter pages; availability of the relevant documents in Council offices and libraries and attendance at Community Council and other Forums.
- 3.3** Seven formal engagement events were held during this time: in Clydebank, Dumbarton and the Vale of Leven with a final session being held in Clydebank Town Hall on a Saturday for those people who could not attend any of the other sessions. These consultation sessions were undertaken in conjunction with the Community Planning Team, as well as, partners from Community Planning. Over 100 members of the public, including school children, gave their views on the Main Issues Report through the consultation events.

#### **4. Main Issues**

- 4.1** Sixty-seven formal responses were received which is considered to be a reasonable level of response to the Main Issues Report (MIR). A short summary on the responses to each issue is provided below. Appendix 1 provides a more comprehensive response and contains the name of the organisation or individual who responded to that particular Issue, the respondent's representation in a summarised form for each Issue and the Council's response. Appendix 2 provides a list of the respondents to the MIR.

##### **Delivering Our Change Places**

- 4.2** The responses received on the Issues associated with Delivering our Changing Places are briefly summarised below:

##### **Main Issue 1: Queens Quay Clydebank**

- 4.3** There was strong support for the preferred option which is to continue to implement the existing strategy and the proposals within the approved design framework for the central Queens Quay area, but also to reallocate areas of land at Rothesay Dock and Cable Depot Road. Comments about what type of business and commercial use there should be on the site, green infrastructure, the library, parking and access were also raised.

##### **Main Issue 2: Dumbarton Town Centre and Waterfront**

- 4.4** There was general support for the preferred option which was to update the Strategy for the Town Centre and Waterfront to reflect the progress made and to improve the existing strategy. Representations also requested that Dumbarton Central Railway Station be included within the Town Centre Boundary and links between Dumbarton Central and the castle and public realm should be enhanced. Bonhill and Dalmonach Community Council suggested that the town centre should be a Simplified Planning Zone and there were comments received regarding the retail boundaries within the town centre and the St James Retail Park.

##### **Main Issue 3: City Deal Project: Esso Bowling and Scott's Yard**

- 4.5** The representations focussed on the road alignment and the difference between the route within the MIR and the current route that was shown at the PAN consultation events for the forthcoming planning application. Other comments were made regarding potential flood risk and habitat loss and whether there was any need for the road as there was no proven demand for commercial development. Parkhall, North Kilbowie and Central and Silverton and Overton Community Councils support the need for a relief road but not the route presently being discussed.

Main Issue 4: Lomondgate, Dumbarton

- 4.6 There was general support for the preferred option for mixed use development on the site, subject to no adverse impact on the vitality and viability of Dumbarton Town Centre. However, one representation requested that the designation for mixed use should extend to the whole of the site. Other representations suggested other uses for inclusion within the site.

Main Issue 5: Vale of Leven Industrial Estate, Dumbarton

- 4.7 Most of the responses were supportive of the preferred option to review the Local Nature Reserve and Greenbelt boundaries in light of recent consents. One response thought that the MIR should have been more proactive in seeking to support business and employment creation within the industrial estate and did not agree with the preferred option as the key issue for the estate.

Main Issue 6: Young's Farm Dumbarton

- 4.8 There was strong support for the preferred option to not allow residential development on the site. Bonhill and Dalmonach and Silverton and Overton Community Councils and the Vale of Leven Trust were of the view that there should be no development at Young's Farm.

Main Issue 7: Clydebank Town Centre Strategy

- 4.9 There was strong support for the preferred option which was to update the existing strategy and to include new proposals aimed at improving Clydebank town centre. One representation supported mixed use on the Playdrome Site and another that the Clyde Retail Park should be included within the town centre. Parkhall, North Kilbowie and Central Community Council outlined the need for a recognisable town centre with day and evening activities. Other issues such as vacant units, low quality of shops, and connections between the A82 and Glasgow/Dumbarton Road were raised. The need for more outdoor facilities, traffic impacts, issues relating to the station and that the shopping centre should be relocated to Queens Quay were also raised by several respondents.

Main Issue 8: Clyde Crossing City Deal Project

- 4.10 There was a mix of views about the proposed Clyde Crossing with an equal number of respondents supporting or opposing the bridge. Traffic impacts associated with the bridge were raised as concern by Parkhall, North Kilbowie and Central Community Council.

Main Issue 9: Stanford Street, Clydebank and the Forth and Clyde Canal

- 4.11 There was general support for the preferred option to undertake a design-led approach to guide the future development of Stanford Street, to improve connections to the Town Centre and to make the Canal a focal point as a leisure and recreation resource. Many of the representations sought further detail on how the design-led approach would work. There were representations that the Canal should be left as it is and that further cafes and shops were not required. One respondent requested, as part of the design led approach, that the Clyde Retail Park should be included within the Town Centre.

Main Issue 10: Lomond Canal

- 4.12** There was strong support for the preferred option to remove the proposed route of the Lomond Canal. Visit Scotland however supported its retention.

Main Issue 11: Bowling Basin; Alexandria Town Centre, Carless, Kilpatrick Hills and Green Network

- 4.13 Bowling Basin** - it was proposed to make minor revisions to the existing strategy in line with the approved Masterplan for the area. There is general support for the strategy for Bowling Basin and therefore the revisions to the strategy based on the Masterplan will be undertaken.
- 4.14 Alexandria Town Centre** - minor revisions to the existing strategy was proposed to reflect development progress on housing opportunity sites at Kippen Dairy and Leven Cottage were required. Bonhill and Dalmonach Community Council and the Vale of Leven Trust suggested that a Simplified Planning Zone should be established for the town centre. Issues such as parking, more facilities and additional parking were also raised.
- 4.15** The MIR considered the strategy for **Carless** to be still relevant at the time of writing due to no proposals being progressed to planning application stage. However, a representation was received which sought a change to the existing strategy of the site and requested that a development strategy for the regeneration of the site is included within LDP 2 setting out the development parameters for the site. In the respondents view, this would therefore remove the requirements for a comprehensive masterplan for the site and provide much needed flexibility for the site's regeneration and reuse over the longer term.
- 4.16 Kilpatrick Hills** - there was general support for the preferred option which was to only support small/medium scale turbines in less visually prominent parts of the Kilpatrick Hills. Concerns about development at Papperthill Farm were raised and further information on what constitutes small, medium and large-scale windfarms was sought. One respondent was of the view that no wind development should be allowed within the Kilpatrick Hills.
- 4.17 Green Network** - the MIR indicated that the current strategy would require revising to more accurately reflect the agreed "Our Green Network" Planning Guidance. However, these revisions were not considered to be a Main Issue on their own and had already been subject to consultation through the preparation of the Planning Guidance document. Representations, however, sought further adjustments to the strategy to improve the green network, provide wildlife corridors and more recreational routes, and to improve maintenance of green network, paths and facilities.

Strengthening our Communities and Economy

- 4.18** The following briefly summarises the responses received for Issues relating to Strengthening our Communities and Economy:

#### Main Issue 12: Creating Places

- 4.19** There was strong support for creating high quality places and for the preferred option of incorporating strong design policies within the proposed plan. Some respondents would like design briefs prepared for certain sites and Bonhill and Dalmonach Community Council and the Vale of Leven Trust would like a framework which allows for placemaking plans to be produced for local areas.

#### Main Issue 13: Private Sector Housing Land

- 4.20** There was mixed support for the preferred options which suggested the allocation of the following additional sites, which were promoted as part of the Call for Sites exercise, to increase the range and choice of private sector housing land: Dumbain Crescent, Haldane; Former Carman Waterworks, Renton; Bonhill Quarry, Bonhill; Castle Road, Dumbarton Football Club Stadium, Dumbarton; Beardmore Place, Clydebank (in part); Hardgate Health Centre, Hardgate; Clydebank Health Centre; and Strauss Avenue, Clydebank (in part).
- 4.21** There was mixed support for the preferred option and some of the respondents wished additional sites to be allocated. Objections to the allocations of Dumbain Crescent, Former Carmen Waterworks, Bonhill Quarry, Overtoun Road, Strauss Avenue were made by Bonhill and Dalmonach Community Council, whereas, Parkhall North Kilbowie and Central Community Council and Silverton and Overtoun Community Council supported the allocation of these site.
- 4.22** Duntiglennan Fields has been submitted for consideration as a housing site by Taylor Wimpey and there were various objections to Young's Farm and Dumbuckhill being allocated for residential uses.

#### Main Issue 14: Affordable Housing

- 4.23** There was general support for the preferred approach to affordable housing which was not to include an Affordable Housing Policy within LDP 2 and to continue to allocate land for Affordable Housing in the Plan instead.

#### Main Issue 15: Business and Industrial Land Supply

- 4.24** There was strong support for the preferred option to carry out a review of business and industrial land. Some responses suggested new allocations or that some existing sites should be considered for alternative uses, such as housing.

#### Main Issue 16: Supporting Our Centres: Retail Core in Town Centres

- 4.25** There was strong support for the preferred option to allow a greater range of uses within town centres. Some respondents were of the view that a Simplified Planning Zone for Alexandria Town Centre should be established. Other comments received thought that the preferred option should also be extended to Alexandria Town Centre; the Clyde Retail Park should be incorporated within Clydebank Town Centre; there should be a widening out of the uses to include leisure within Clydebank Town Centre; consideration should be given to flexible uses of spaces; and that town centres should start to develop their own identity.

#### Climate Change and Green Infrastructure

- 4.26** The following briefly summarises the responses received for Issues in Climate Change and Green Infrastructure:

#### Main Issue 17: Heat Generation and Heat Networks

- 4.27** There was strong support for the preferred option, which was to introduce a new policy within LDP 2 aimed at supporting and provide policy guidance on the measures required now and in the future to ensure that new developments can create or link into a heat network. Housebuilders, however, were of the view that district heating is not suitable for all sites and there should be a pragmatic and balanced approach. Clydebelt indicated that new buildings should have methods of eco-friendly heat production and that the use of the River Leven should be used to produce electricity as a hydro scheme.

#### Main Issue 18: Green Infrastructure: Allotments/Community Gardens

- 4.28** There was strong support for the preferred option to allocate new sites for allotments/community gardens within West Dunbartonshire. Some of the responses specifically asked for certain sites to be allocated, whereas, one respondent asked for a site not to be considered for use as an allotment due to a planning consent on that site being partly implemented. Parkhall, North Kilbowie and Central Community Council also indicated that new sites must have funding in place for long term maintenance and clearly establish responsibility for the site. However, one housebuilder was of the view that land within new housing developments should not be sacrificed for allotments or community gardens

#### Miscellaneous Representations not relating to a Main Issue

- 4.29** There were a number of representations raising issues that were not considered within the Main Issues Report. These are briefly summarised below:

#### Developer Contributions

- 4.30** Network Rail and NHS Greater Glasgow and Clyde made representations in relation to developer contributions being collected from new development to fund new local healthcare facilities, to supplement and enhance existing facilities; and to be directed towards upgrading, where required, of rail infrastructure or facilities at train stations.

#### Transportation Issues

- 4.31** Parkhall and North Kilbowie and Central Community Council indicated that the MIR does not provide proposals to ease acute traffic congestions and omits references to improving traffic flow at the Kilbowie Roundabout, which was contained in the Proposed Plan (2016). They suggest a list of ideas to improve traffic flow. Network Rail broadly supports the MIR but requires continued support for safeguarding and improving the safety and capacity and, where appropriate, provide measures to mitigate adverse impacts on infrastructure and capacity issues arising from new development. Other issues about the operation of Kilbowie Roundabout, parking on Castlegreen Street and congestion on the A82 were raised.

#### Outdoor Advertising

- 4.32** A representation was received requesting that the Proposed Plan (2016) policy on advertising is extended to allow advertising signs on Roundabouts in order to increase the Council's income streams.

#### Representations received in relation to Development Sites

- 4.33** There were a number of representations to Chapter 5 of the Main Issues Report which detailed the sites that the Council proposed to include, remove or amend the designation of within LDP 2. These comments are not included within this report as the review of development sites is still ongoing. The responses to the Main Issue Report in this regard will form part of the Proposed Plan.

#### Strategic Environmental Assessment

- 4.34** The Main Issues Report has been subject to Strategic Environmental Assessment. The consultation authorities (Historic Environment Scotland, SEPA and SNH) have provided advice on the assessment process and results. In general terms, the consultation authorities found the Strategic Environmental Assessment Environmental Report to be comprehensive, clear and concise. There was disagreement on some of the conclusions reached, baseline data, mitigation measures and monitoring indicators. This will be addressed as the Environmental Report is revised alongside the preparation of the Proposed Plan.

#### Next Steps

- 4.35** A series of Elected Members workshops on the Proposed Plan, which is the next stage in the development plan process, will be organised for April/May 2018 to allow Members to provide their input into the Plan. It is scheduled to bring the Proposed Plan for approval to the Planning Committee no later than August 2018, which is slightly later than anticipated within the Development Plan Scheme. This is a slight delay due to the Open Space audit required for the Plan being delayed due to detailed discussions with Greenspace and the timeframe for the Glasgow and Clyde Valley Green Network Partnership to take this forward and complete the Green Infrastructure Supplementary Guidance. The Business and Industrial Review currently undertaken by Ryden, which will inform the Proposed Plan has also been subject to delay due to the initial poor response rate to the business survey that was issued as part of the review. This resulted in the survey having to be re-issued to achieve a better response. Although the submission of the Proposed Plan to Planning Committee may be delayed by a month or so, the timescale of November 2018 for the submission of the Proposed Plan to the Scottish Government which is detailed in the development plan scheme still can be achieved.
- 4.36** After approval by Planning Committee, the Proposed Plan is required to be put on deposit for a sufficient period to enable objections/representation to the Plan to be received. It is proposed to allow six weeks for the representation/objection period for the Proposed Plan. It is also proposed within this six week period to hold three public information sessions to allow

people to discuss any issues they have with the content of LDP 2. Meetings will also be offered to Community Councils and other organisations to discuss the LDP, should they so wish, within this period.

#### Clydeplan: Judicial Review

- 4.37** The approved Strategic Development Plan, Clydeplan, is currently the subject of a legal challenge in the Court of Session with a specific focus on the housing strategy and housing land requirement of the Plan. At the time of writing this report, the hearing into the legal challenge had recently been concluded and the judgement of the Court of Session is currently awaited. The implications of the judgement and the effect on the Proposed Plan are not known; however, should the appeal against Clydeplan be upheld there could be consequences for the housing land requirement within the Proposed Plan. A verbal update to Planning Committee will be given if the decision of the Court of Session has been made before this report is considered.

### **5. People Implications**

- 5.1** There are no personnel issues associated with this report.

### **6. Financial Implications**

- 6.1** There are no financial implications associated with this report.

### **7. Risk Analysis**

- 7.1** There was no risk assessment carried out in relation to this report.

### **8. Equalities Impact Assessment (EIA)**

- 8.1** An Equalities Impact Assessment was undertaken for the Main Issues Report. This suggested the targeting of certain minority groups during the consultation exercise. No responses to the Main Issues Report were received from any organisations representing minority groups. The next stage of the plan preparation exercise, the Proposed Plan, will also be subject to an Equalities Impact Assessment.

### **9. Consultation**

- 9.1** This report summarises the responses received in relation to the Main issues Report. Details of the consultation exercise are set out in paragraph 3.2 above.

### **10. Strategic Assessment**

- 10.1** The Main Issues Report had a strong focus on delivering regeneration, placemaking and design. It is considered to contribute to all of the Council's strategic priorities. This will be carried through to the Proposed Plan.

**Peter Hessel**  
**Strategic Lead - Regulatory**  
**Date: 5th March 2018**

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**Appendices:** Appendix 1: Summary of Responses to Main Issues Report and the Council's Response.  
Appendix 2: List of Respondents

**Background Papers:** West Dunbartonshire Local Development Plan: Main Issues Report and accompanying documents.

**Wards Affected:** All



## Appendix 1: Summary of Responses to Main Issues Report and the Council's Response

<b>Issue 1</b>	<b>Queen's Quay, Clydebank</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The Council's preferred option is to continue to implement the existing strategy and the proposals within the approved design framework for the central Queens Quay area, but also to reallocate areas of land</p> <p><b>Alternative Option:</b> The alternative option is to continue to implement the existing strategy and retain the current designations for the areas of land outwith the central area. This would not reflect the current position of the Council of developing this area in a comprehensive manner. It could also lead to these areas of land being undeveloped, potentially due to the market not being interested in those original uses.</p> <p>Due to the proposed expansion of the Golden Jubilee Hospital, it is considered that there needs to be a better mix of uses within these areas to allow them to be developed.</p>	
<b>Responses received from</b>	
<p>Parkhall, North Kilbowie and Central Community Council  Silvertoun and Overtoun Community Council  Bonhill &amp; Dalmonach Community Council  Visitscotland  Clyde Marine Planning Partnership  Vale Of Leven Trust  SNH  SEPA  Clydebelt  Scottish Water  Anonymous (Your Place, Your Plan event)</p>	
<b>Summary of responses</b>	
<p>General support for the preferred option of the revised Strategy and proposals. The following points were also made:</p> <ul style="list-style-type: none"> <li>• <b>Parkhall, North Kilbowie and Central Community Council</b> request that disabled access/parking to rear of Library is provided. Improved access from Clydebank railway station to Queens Quay is also required as is upgrading to the Glasgow Road/Dumbarton Road corridor.</li> <li>• <b>Silvertoun and Overtoun Community Council</b> state the need to minimise pollution and disruption to nearby Inner Clyde SSSI &amp; SPA. Support Green Network improvements through the site.</li> <li>• <b>Bonhill &amp; Dalmonach Community Council</b> state that the Council must strengthen active travel routes for sustainable commuting and enhance green infrastructure. Any mixed use must not conflict with Clyde Shopping</li> </ul>	

Centre. They are disappointed with removal of Fastlink.

- **VisitScotland** ask how the Council will ensure that any business/commercial uses are compatible with residential? Plots 4 and 5 adjacent to the riverside would be better suited to leisure/recreation/tourism/food and drink businesses to take advantage of waterfront location and views.
- **Clyde Marine Planning Partnership** state, through SNH, that a sea level rise report: 'Impacts of sea level rise and storm surges due to climate change in the Firth of Clyde' has been commissioned .
- **SNH** state that careful consideration to design, massing and scale, including materials and colour to integrate the development within the landscape and wider views. Need for improved connections between the waterfront and wider assets including the town centre and canal. Support the intention to explore green infrastructure and recreation opportunities at the railway bridge/embankment. All factors that may have implications for the conservation objectives of the SPA must be considered.
- **Clydebelt** state inadequate greenspace provision in masterplan for the size of future population. Need more open spaces. Provide fitting memorial/tribute to this famous former shipyard. Provide adequate parking for public buildings-especially for elderly/infirm.
- **Anonymous (Your Place, Your Plan event)** is of the view that we need to create an extension to Town Hall for expanded museum.

### Our response

There is overall strong support for the revised Strategy set out in the MIR. Issues of green infrastructure, parking and access will be refined as the Strategy and masterplan is finalised. The SPA will be protected. Individual proposals for business/commercial use will be assessed against the Strategy and on their own merit in terms of benefits and fit with other uses.

LDP 2 will reflect the latest proposals in the Masterplan.

<b>Issue 2</b>	<b>Dumbarton Town centre and Waterfront</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The Council's preferred option is to update the Strategy to reflect the progress that has been made and to improve the existing strategy by revising the existing proposals and including new proposals as detailed in "Does the strategy for Dumbarton Town Centre and Waterfront need to be revised?" It is proposed that the footbridge from the town centre to Levensgrove Park is also retained within the strategy even though the aspiration for the footbridge is a long term ambition of the Council.</p> <p><b>Alternative Option:</b> To include within the revised strategy, support for a retail development opportunity to the east of St James Retail Park and for the revision of existing floorspace, including the introduction of smaller scale retail development, within the retail park.</p> <p>This is not the preferred option as the current strategy for the Network of Centres Retail Strategy restricts small-scale retail development at out-of-town-centre locations in the interest of protecting the vitality and viability of the town centre as required by Scottish Planning Policy, in particular, the Town Centre First Principle. Further to this, it is not considered necessary to identify a commercial centre development in Local Development Plan 2 where the retail related policies will allow for consideration of any new proposals that come forward.</p> <p>The alternative option also removes the aspiration of the footbridge over the River Leven due to it being a long term goal.</p>	
<b>Responses received from</b>	
<p>David Harvie(Dumbarton Stations Improvement Trust)  Mr Jeremy Watson  Parkhall, North Kilbowie and Central Community Council  Silvertoun and Overtoun Community Council  Theatres Trust  Montagu Evans on behalf of Dumbarton Football Club  Bonhill &amp; Dalmonach Community Council  Visitscotland  LaSalle Investment Management Ltd  Clyde Marine Planning Partnership  Vale of Leven Trust  Montagu Evans on behalf of Legal and General - St James Retail Park  SNH  SEPA  Scottish Water  "Rose" (Your Place, Your Plan event)</p>	

### Summary of responses

There is general support for the preferred option of revising the existing Strategy and including new proposals. The following points were also made:

- **Dumbarton Stations Improvement Trust** is of the view that the station needs to be within the town centre boundary and public realm improvements are required for the surrounding area.
- **Mr Jeremy Watson** is of the view that enhanced links and public realm are required to link the Castle and Central Station and that they must include the station within the town centre. The Council should consider designating a conservation area to include Station and environs to provide a 'Gateway to Dumbarton'. Consideration needs to be given to setting up a Planning Forum to take forward work of Charrette. Improved river access for boats/ferries also needs to be included.
- **Parkhall, North Kilbowie and Central Community Council** state that improved access and signage for Dumbarton Castle is required and that the Dumbarton Central should be included within the town centre. Glencairn House on High Street needs proper restoration and reuse. They oppose the footbridge over River Leven.
- **Silvertoun and Overtoun Community Council** request the inclusion of Dumbarton Central within the Town Centre Strategy.
- **Theatres Trust** supports the preferred approach but state that any redevelopment/refurbishment of Artizan Centre must be mindful of operation and future of Denny Theatre, especially links to High Street.
- **Bonhill & Dalmonach Community Council** state that the Council should consider a Simplified Planning Zone for the town centre. They welcome a new footbridge across the River Leven but do not support residential development on Dumbarton Football Club site; the existing Football Club ground should remain and be enhanced rather than relocating the existing facilities. Do not support any proposals at Young's Farm. Dumbarton Central train station should be included in the town centre boundary and Sandpoint Marina should be developed at lower density.
- **Montagu Evans for Dumbarton Football Club** state that the current stadium should be redeveloped in line with Charrette and a new stadium built at Young's Farm.
- **Visit Scotland** state that there should be provision of a step-ashore facility in the River Leven.
- **LaSalle Investment Management Ltd** is of the view that the Council should exclude riverside redevelopment areas from town centre boundary and retain a compact core shopping area around High Street and Artizan Centre. Any move away from large scale, bulky goods units at Retail Park

should be resisted.

- **Montagu Evans on behalf of Legal and General** state that Phase 2 (extension) of Retail Park should be acknowledged as retail opportunity. Smaller units and High Street uses (Class 1 or 3) should be allowed at Retail Park.
- **SNH** is of the view that the Council should recognise the Special Protection Area in the Town Centre policy. Careful consideration should be given to design, massing and scale, including materials and colour across the wider area.

#### **Our response**

The Local Development Plan will take forward the Preferred Option and include the Railway Station within the town centre boundary to recognise its role in the functioning of the town centre. There is no additional evidence to justify changing the policy status, with regard to the retail function of the St James Retail Park, from its current complementary role to the town centre.

<b>Issue 3</b>	<b>City Deal Project: Esso Bowling and Scott's Yard</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The preferred option is for Local Development Plan 2 to reflect the route of the realigned road, as detailed in map 6, to accord with City Deal proposals and the draft Masterplan. It is considered that the realigned road can be accommodated without having an adverse impact on natural heritage and flood risk, although this still requires to be demonstrated. It is proposed to retain the existing strategy for Scott's Yard.</p> <p><b>Alternative Option:</b> The alternative option is to retain the existing strategy with no change to the road alignment. This does not reflect the technical work undertaken for the City Deal project and the preferred route within the draft Masterplan, which is subject to consultation and planning permission being granted.</p>	
<b>Responses received from</b>	
<p>Systra on behalf of Transport Scotland,  Susan Dick,  Parkhall, North Kilbowie and Central Community Council,  Silverton and Overtoun Community Council,  Susan Jameson,  Bonhill and Dalmonach Community Council,  G Parton,  Visitscotland,  Peter Brett Associates on behalf of City Deal,  Clyde Marine Planning Partnership,  Vale of Leven Trust,  SNH, SEPA,  Clydebelt,  Scottish Water</p>	
<b>Summary of responses</b>	
<p>There was general support for a relief road but not the route that was detailed within the preferred option. The following points were also raised:</p> <ul style="list-style-type: none"> <li>• <b>Transport Scotland</b> state that further discussion regarding the level of development and the impact on the existing road network is required.</li> <li>• <b>Susan Dick, Susan Jameson and G Parton</b> state that the proposed line of road is incorrect. It runs through private land, is greenbelt and there is considerable opposition to it.</li> <li>• <b>Parkhall, North Kilbowie and Central Community Council</b> provide support for A82 relief road, although the route needs to be reconsidered, and support for industrial development. Explore funding to facilitate restoration of Dunglass Castle, and ensure access to it and the Henry Bell monument is maintained.</li> <li>• <b>Silverton and Overtoun Community Council</b> support the need for a</li> </ul>	

relief road, but not the proposed route. Disagree in principle with any industrial development on this site, with a preference for a nature reserve.

- **Bonhill and Dalmonach Community Council** support the relief road, but have concern regarding deliverability due to ownership. There is sufficient existing business and industrial space; preferred use would be marina with opportunity for cruise ships to dock.
- **Bonhill and Dalmonach Community Council, Vale of Leven Trust and Clydebelt** state that good pedestrian and cycle links should be provided along the new road
- **Peter Brett Associates** advise that the road alignment shown during the PAN consultation events is the current preferred option, but some flexibility may still be required. The strategy shown in Map 6 requires to be updated in a number of respects.
- **Clyde Marine Planning Partnership** advise that a recent publication on sea level rise and storm surges in the Firth of Clyde should be taken into consideration in order to direct development away from coastal areas at risk of future flooding.
- **SNH** do not support proposed route of road as it does not reflect most recent discussions and would result in habitat loss within the SPA.
- **SEPA** support the emerging strategy for the site and the new road. Some concern over changing Scott's Yard to residential use which is more vulnerable to flood risk.
- **Clydebelt** query the value of developing the road when there is no proven demand for commercial development. Support residential development on Scott's Yard. Consider the future river passenger transport and a possible heritage centre, ensure access to Dunglass Castle, and clean up Bowling Harbour.
- **Scottish Water** state that discussions are on-going regarding the most appropriate water and waste water strategies whilst retaining access to Scottish Water's assets .

#### **Our response**

The road layout shown in the MIR was the current one at the time of preparation of the MIR. It is clear that there is opposition to this route and the current draft masterplan has revised it.

The development of this site is through the City Deal project and the future uses of the site will be reflective of the aims of this project. An assessment of existing business and industrial land is currently being undertaken by Ryden, on behalf of the Council, which may help assess the need and demand for these uses.

The concerns raised through the MIR consultation will be addressed through the

Proposed Plan and the masterplan for the site. It will take into account any new information in relation to updated flood risk and ensure no adverse impact on the SPA.

<b>Issue 4</b>	<b>Lomondgate</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred option:</b> The Council's preferred option is to adopt a more flexible approach when considering potential uses for the proposed business park area. The majority of the site would still be reserved for Business and Industrial uses, but the Council will allocate a portion of the site for alternative uses, such as commercial leisure and tourism uses associated with a garden centre, hotel, gym etc. These types of uses will only be considered acceptable where they are complimentary to the development and where there would not be a detrimental impact on the vitality and viability of Dumbarton town centre. This approach would provide greater flexibility and allow the marketing of the business park to a wider market.</p> <p>It is not considered appropriate or necessary to designate the Roadside services site as a commercial centre.</p> <p><b>Alternative Option:</b> The Council will continue to safeguard the business park as an industrial/business opportunity reserved for use classes 4 and 5 as is the current situation within the Proposed Plan (2016) and any proposals for alternative uses will be considered against the appropriate policies within Local Development Plan 2. The Council will also continue to identify the Roadside Services site for the same types of uses which are currently on the site but only where they do not significantly impact on trade within town centres, which is the existing approach within the Proposed Plan (2016).</p>	
<b>Responses received</b>	
<p>Systra on behalf of Transport Scotland,  Parkhall, North Kilbowie &amp; Central Community Council,  Silvertoun and Overtoun Community Council,  Strathleven Regeneration CIC/Walker Group,  Bonhill &amp; Dalmonach Community Council,  VisitScotland,  Vale of Leven Trust,  SNH,  SEPA,  Scottish Water.</p>	
<b>Summary of responses</b>	
<p>There was general support for the preferred option but the following points were made:</p> <ul style="list-style-type: none"> <li>• <b>Strathleven CIC/Walker Group</b> seek the flexibility of having the mixed use zoning extended to cover the full current business and industrial opportunity site.</li> <li>• <b>Transport Scotland</b> requires further information to understand the potential trip generation differences between the existing land use</li> </ul>	

allocation any new proposed land use allocation.

- **Parkhall, North Kilbowie and Central Community Council** are in general agreeance with the preferred option but think that this could be extended to include hotel/tourist information centre.
- **Silvertoun and Overtoun Community Council** suggest a tourist information centre use for the site.
- **Bonhill & Dalmonach Community Council** and the **Vale of Leven Trust** generally support flexibility here subject to the vitality/viability of town centres not being affected and support a use which is not in the vicinity of the area, is different to elsewhere and suggest more wet weather activity centres.
- **Visit Scotland** support the option to allocate mixed use at Lomondgate Business Park.
- **SNH** recommend where new development is proposed that consideration is given to factors to help integrate the development in wider views, as well as setting out developer requirements and active travel connections.
- **SEPA and Scottish Water** have no specific comment but Scottish Water recommend early engagement by developers once uses are known
- **Susan Cuthbert** supports use of creches, gym and garden centres at this location.
- A note of support of the preferred option was recorded at the Your Place, Your Plan events.

### Our response

In relation to the representation from Strathleven CIC/Walker Group, the Council will explore the request to extend the mixed use coverage to the full site. However, this decision will be influenced by the Business and Industrial Review that is currently being carried out by Ryden on the behalf of the Council. The requirement to have flexibility is understood; however, this is a key site for business and industrial development and the majority of the site must be reserved for this purpose. Therefore, should the Council's views be quantified by the Ryden study, then a strong policy framework would be required to ensure that the site is predominantly developed for business and industrial and that any other use on the site is appropriate and based on the types of uses suggested within the MIR preferred option. The Council has held a subsequent meeting with Systra and Transport Scotland and has agreed to provide further details on the likely uses within the site once these have been agreed.

Consideration for the mixed-use zoning to be extended to hotel/tourist information centre will also be considered as these could be compatible uses within the site

and due to Lomondgate's prominence on the A82, these could be beneficial to the development of the site.

LDP 2 will include a new development policy to be developed to ensure that the majority of the site is developed for business and industrial use and that the other acceptable uses for the site are in line with the MIR preferred option and protect the vitality and viability of Dumbarton Town Centre.

When deciding on the final allocation and composition of the site, the comments of SNH will be considered and these could become requirements for developers to include within their development proposals. Similarly, a requirement to consult Scottish Water at an early stage on development of the site can also be included.

<b>Issue 5</b>	<b>Vale of Leven Industrial Estate</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The Council will review the Greenbelt and Local Nature Conservation Site designations in light of the consent granted for Macphersons to ensure that the boundaries of these areas are current. It will not reflect the proposals from Chivas at this point as this may prejudice the consideration of the forthcoming planning application, but the future Proposed Plan will revisit the boundary should the planning permission for Chivas be granted.</p> <p>The Council will also ensure that significant protection is given for the remaining areas of open space and habitats, the woodland setting of the Vale of Leven Industrial Estate and its current recreational use. Further protection through planning policy will ensure that there is no significant and adverse loss of leisure and recreational resources as a result of development with the Vale of Leven Industrial Estate. This will also ensure that there is no significant and adverse loss of open space and habitats within the Greenbelt and River Leven Local Nature Conservation Site.</p> <p><b>Alternative Option:</b> There was not considered to be an alternative option for this Issue.</p>	
<b>Responses received from</b>	
<p>Parkhall, North Kilbowie &amp; Central Community Council  Bonhill &amp; Dalmonach Community Council  Visitscotland  Vale of Leven Trust  Muir Smith Evans on behalf of Chivas  SNH  SEPA  Clydebelt  Scottish Water</p>	
<b>Summary of responses</b>	
<p>There was general support for the preferred option of the revised Strategy and proposals. The following points were also made:</p> <ul style="list-style-type: none"> <li>• <b>Bonhill &amp; Dalmonach Community Council and Vale of Leven Trust</b> state that: <ul style="list-style-type: none"> <li>○ Areas GE1(5) &amp; GE1(3) as outlined on Map 9, should be returned to green space. This area has historically always been open space (at least 75 years) and has significant biodiversity, flora &amp; fauna. In any case it is within the HSE notification zone so has limited use. Supports no further incursion into the greenbelt.</li> </ul> </li> </ul>	

- The Council should consider a pedestrian/cycle route from Bonhill to Dumbarton.
  - BH3 – Strathleven Estate – on the map, area of estate protection overlaps with development opportunity shading, which is confusing. Which takes precedence?
  - Further site opportunity at GE1(2) should be held back as plenty of existing vacant units. Concentrate on filling those before releasing more land.
  - Would support the reinstatement of the footway around the Kilmalid Extension Boundary GE1(5).
- **Muir Smith Evans on behalf of Chivas** state the following–
    - MIR should have been more proactive in seeking to support business and employment creation.
    - Measures to accommodate the sustainable expansion of Kilmalid by Chivas could and should have been identified as a main issue. The preferred option should have clearly stated support for the Chivas proposals and should have confirmed the proposed amendment of the LDP in order to accommodate them instead of through a planning application.
    - In relation to Question 5 in the MIR, Chivas does not agree that protection of the greenbelt and local nature conservation site is the key issue facing the Vale of Leven Industrial Estate.
  - **SNH** agree with the preferred option for a review of the Green Belt and Local Nature Conservation Site to protect remaining areas of open space and habitats, the woodland landscape framework of the Industrial Estate and to support recreational uses.
  - **Clydebelt** state that areas GE1(2), GE1(3) and GE1(5) contain mature trees, particularly in the designed landscape to the east of Strathleven House. The MIR shows these as being suitable for industrial/business use. These woodlands should be enhanced rather than destroyed and have a TPO put on them.

### **Our response**

Most responses were supportive of the preferred approach to review the Greenbelt and Local Nature Conservation Site designations in light of the consent granted for Macphersons to ensure that the boundaries of these areas are current.

It is considered that this approach best maintains a balance between protecting open spaces, the green belt and nature designations on the one hand, and allowing for suitable development opportunities for new and expanded businesses.

It would not have been appropriate to make changes to the designations to

support/accommodate the Chivas extension proposals in advance of the determination of a planning application, as it would have prejudiced the consideration of the application. However the planning application has now been approved and the boundaries will be updated in the Proposed Plan to reflect this permission.

LDP 2 will also ensure that the correct boundaries are shown on the Proposals Maps for Strathleven Estate to address the comments of Bonhill & Dalmonach Community Council, Vale of Leven Trust and Clydebelt. The Proposals Map will also be updated based on the review of the Greenbelt and Local Nature Conservation Site in light of the consents granted for Macphersons and Chivas.

<b>Issue 6</b>	<b>Young's Farm</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The preferred option is not to allow residential development to enable the relocation of Dumbarton Football Club. There is currently no requirement for significant additional housing land and it would be difficult to provide a satisfactory residential environment and a successful place connected to the existing built form. Young's Farm will remain within the Greenbelt and the relocation of the stadium will continue to be supported in line with the provisions established in the Proposed Plan (2016).</p> <p><b>Alternative Option:</b> The alternative option, which is not preferred, is to allow housing on the site as enabling development, limited to the minimum amount of housing required to enable the stadium to be built, which has not been justified at this stage.</p>	
<b>Responses received</b>	
<p>Systra on behalf of Transport Scotland,  Susan Dick,  Parkhall North Kilbowie and Central Community Council,  Silverton and Overtoun Community Council,  Montagu Evans for DFC,  Bonhill and Dalmonach Community Council,  G Parton,  VisitScotland,  Vale of Leven Trust,  SHN,  SEPA,  Clydebelt,  Scottish Water,  Susan Cuthbert (Your Place, Your Plan Event)</p>	
<b>Summary of responses</b>	
<p>Most responses were supportive of the preferred option. However, the following points were raised:</p> <ul style="list-style-type: none"> <li>• <b>Susan Dick, Parkhall, North Kilbowie and Central Community Council, Silverton and Overtoun Community Council, Bonhill and Dalmonach Community Council, G Parton, VisitScotland, Vale of Leven Trust, Clydebelt, and Susan Cuthbert</b> do not support residential development at Young's Farm.</li> <li>• <b>Silverton and Overtoun Community Council, Bonhill and Dalmonach Community Council and Vale of Leven Trust</b> state that there should be no development proposed at Young's Farm at all given the technical uncertainties about whether development is feasible and the impacts on access, traffic, nature conservation, habitat loss etc.</li> </ul>	

- **Bonhill and Dalmonach Community Council** state that the Proposed Plan should provide clarity over whether development is supported by the Council or not as the previous Local Development Plan: Proposed Plan (2016) was unclear on this.
- **Montagu Evans on behalf of Dumbarton Football Club** are of the view that the enabling residential development is the only viable option to fund the new stadium, and this in turn will help promote the vision of the Dumbarton Rock and Castle Charrette on the existing stadium site. An application has been submitted for Young's Farm, the proposals of which differ in some respects to those shown in the Main Issues Report.
- **SNH** state that there is sufficient land to meet housing requirements and the Local Development Plan needs to align with the SDP's compact city model.
- **SEPA** advise that there is a need to ensure no development occurs in the functional floodplain and that the site can be suitably drained.
- **Scottish Water** advises that the site would drain to Ardoch Waste Water Treatment Works, which is currently undergoing an assessment of capacity. A growth project may be required here to serve development.
- **Transport Scotland** advised that a revised Transport Assessment is awaited in relation to the planning application.

#### **Our response**

A planning application has been submitted for the relocation of the football and enabling residential development which is currently under consideration. Local Development Plan 2 will therefore reflect the decision made on the current planning application.

<b>Issue 7</b>	<b>Clydebank Town Centre</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The Council's preferred option is to update the Strategy and to include new proposals aimed at improving Clydebank town centre.</p> <p><b>Alternative Option:</b> The alternative option is to retain the existing strategy as outlined in the Proposed Plan (2016). This option is not preferred as parts of the strategy would be out of date and, as a result, would not reflect the current aspirations of the Council, existing and future development proposals or the Clydebank Charrette proposals.</p>	
<b>Responses received</b>	
<p>Zander Planning on behalf of Henry Boot, Parkhall, North Kilbowie &amp; Central Community Council, Savills on behalf of Clyde Retail Park, Bonhill &amp; Dalmonach Community Council, VisitScotland, SNH, SEPA, Scottish Water, Anonymous (Your Place, Your Plan event), Martin Aird (Your Place, Your Plan event)</p>	
<b>Summary of responses</b>	
<p>There is general support for the preferred option. The following points have also been made:</p> <ul style="list-style-type: none"> <li>• <b>Zander Planning on behalf of Henry Boot</b> agree with the preferred option to identify a mixed use proposal at the Playdrome site.</li> <li>• <b>Parkhall, North Kilbowie &amp; Central Community Council</b> outline the need for a recognisable town centre with evening and day activities. Issues need addressed surrounding the existing provision of uses (low quality/vacant shops. Bookmakers etc) and connections between A82 and Glasgow Rd/Dumbarton Rd needs to be rethought.</li> <li>• <b>Savills</b> propose that the preferred strategy should include Clyde Retail Park as part of the town centre, given its complementary role.</li> <li>• <b>Bonhill &amp; Dalmonach Community Council</b> agree with preferred option for Playdrome site but state that this should not impact negatively on the existing retail offer of the shopping centre. They are fully supportive of transport improvements at the Clydebank interchange.</li> <li>• <b>VisitScotland</b> agree with the preferred strategy.</li> <li>• <b>SNH</b> support delivery of green infrastructure and high quality active travel, as well as, outlining any developer requirements.</li> </ul>	

- **SEPA and Scottish Water** have no specific comments on the issue but **Scottish Water** encourage early engagement once uses are agreed and developers in place.
- **A range of comments from those attending the Your Place Your Plan events included the following:** the need for another big supermarket retailer in the town centre; more outdoor facilities (West Dunbartonshire wide); concern regarding traffic impact from development; do people use/need an interchange; disabled access to train station is poor and more low carbon transport should be encouraged; the shopping centre should have been moved to Queens Quay and redeveloped for housing; and vehicular access onto Kilbowie Road is required.

### **Our response**

The existing town centre provides for a mix of uses including the Clyde Shopping Centre, as well as, traditional retail, leisure, commercial and residential uses. Scottish Planning Policy identifies commercial centres as those which have a more specific focus on retailing and/or leisure uses. The existing uses at Clyde Retail Park have a specific retail focus and therefore fit the context of a commercial centre.

Widening the town centre boundary could have impacts for the existing retail offer within Clydebank, particularly where there are already vacant units in prime retail locations (closures of BHS and Dunnes in the last couple of years have left large vacancies in the shopping mall).

Therefore, it is considered that the town centre boundary should not be amended to include the Clyde Retail Park and it will be reviewed through the approach to Stanford Street and the Forth and Clyde Canal as per Main Issue 9.

The proposed strategy for the town centre encourages a further mix of town centres uses, including activity and connections with the canal area and supports improvements to and connections between the town centre and Queens Quay across the A814. Traffic impacts from proposed developments are assessed as part of the planning application process.

Local Development Plan 2 will therefore proceed to implement the preferred option.

<b>Issue 8</b>	<b>Clyde Crossing City Deal Project</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The Council is working with Renfrewshire Council to understand the proposals for the new crossing and how this will impact on Clydebank. The Council is waiting for the conclusions of the various studies and will take an informed decision on how best to proceed following the outcomes of these studies.</p> <p><b>Alternative Option:</b> There is not considered to be an alternative option for this issue.</p>	
<b>Responses received</b>	
<p>Parkhall, North Kilbowie and Central Community Council;          Bonhill &amp; Dalmonach Community Council;          SNH;          SEPA;          Scottish Water;          Claire McDonald;          Mr Alan Speirs;          Martin Aird;          Anonymous comments (Your Place Your Plan event)</p>	
<b>Summary of responses</b>	
<p>The following points were raised in relation this Issue:</p> <ul style="list-style-type: none"> <li>• <b>Parkhall, North Kilbowie and Central Community Council</b> are in favour of the new bridge linking Renfrew and the east end of Clydebank. The Community Council state that while the proposals for the project south of the river are quite detailed and realistic; the scheme on the north bank lacks much detail, especially with respect to traffic management. Further they state that they were informed as part of the consultation on the proposed crossing at the new bridge would not become a primary route across the river and that the traffic flows would be relatively small. They state they don't believe this and that any closure of the Erskine Bridge or repair works would cause a huge surge in traffic heading through Clydebank to the new crossing. Kilbowie Roundabout and the existing road connections between the A82 and Dumbarton Road and Glasgow Road are already very badly congested at peak hours so additional traffic would result in gridlock. Before the new bridge receives planning permission there has to be a logical, well developed and fully funded plan in place to improve traffic flow through and around Clydebank. Failure to do this will result in even greater economic malaise and further pollution of the environment from stationary traffic.</li> <li>• <b>Bonhill &amp; Dalmonach Community Council</b> would support in principle the new connection over the River Clyde, particularly if this allowed better access to employment opportunities and also to the airport, etc. However more details of the bridge would require to be set out, to show what</li> </ul>	

benefits West Dunbartonshire would gain from the bridge, also what plans the Council has to attract people, business, and commercial interests along with employment to West Dunbartonshire to gain maximum benefit from the bridge and to prevent all the benefits going to surrounding areas such as Renfrewshire.

- **SNH** have responded to a recent planning application for the Clyde Waterfront and Renfrew Riverside City Deal proposal and are continuing to advise with regards to the impact of the proposal on bats.
- **SEPA** advise that this main issue is unlikely to prejudice their interests, however they highlight the need of awareness on the siting of the new bridge structure associated with this project and the provision of the infrastructure associated with the district heating systems in the adjacent areas.
- **Scottish Water** request continued engagement with the planning of the Clyde crossing to determine the impacts on Scottish Water infrastructure.
- **Ms Claire McDonald** thinks the bridge would be a good idea in terms of commuting.
- **Mr Alan Speirs:** advises that there are a number of issues with this proposal:
  - 1) The 'pull' of visitors from Clydebank to Braehead - example of Paisley Town Centre as an example;
  - 2) - Lack of contingency should bridge be out of use/inaccessible;
  - 3) Unsuitability of feeder roads which would serve the bridge on Clydebank side; and
  - 4) Lack of informed discussion with locals around this issue. No real attempt made to engage locals.
- **Mr Martin Aird** is of the view that the bridge would help access to new hospital and airport.
- **Anonymous comments:** one respondent was worried that the new bridge will hurt shops in Clydebank and questioned how the town centre would ever compete with Braehead. Also stated that Clydebank town centre needs another supermarket as ASDA is not enough of a draw.
- Another respondent stated the new bridge would be good for getting to Queen Elizabeth Hospital, but was worried about extra traffic and delays in Clydebank.
- The final respondent stated that the bridge will have negative impact on Glasgow Road due to the increased traffic and wondered what how the bridge proposal would affect the Glasgow Road street improvements at Clydebank Town Hall?

<b>Our response</b>
<p>The planning applications for the City Deal project have been referred to the Scottish Ministers for determination.</p> <p>Local Development Plan 2 will reflect the decision of the Scottish Ministers where appropriate in terms of land use planning within West Dunbartonshire.</p>

<b>Issue 9</b>	<b>Stanford Street and the Forth and Clyde Canal</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> A Design-led approach will be undertaken to guide the future development of Stanford Street and to improve connection with surrounding areas, in particular the town centre and the Clyde Retail Park and any future development on the Playdrome site. It will also look at proposals to improve the Forth and Clyde Canal for leisure and recreation and how the Canal can become a central feature in establishing night time uses within the town centre and how this could extend to include the retail park.</p>	
<p><b>Alternative Option:</b> The alternative option would be to continue with the existing strategy within the Proposed Plan (2016). This approach would not use the Forth and Clyde Canal as an integral part of encouraging night time uses within the town centre and beyond. It would also not allow for consideration of the adjacent retail park as a possibility for contributing towards an improved evening economy.</p>	
<b>Responses received</b>	
<p>Ms Susan Dick;  Parkhall, North Kilbowie and Central Community Council;  Savills on behalf of Clyde Retail Park;  Bonhill &amp; Dalmonach Community Council;  G Parton;  VisitScotland;  SNH;  SEPA;  SportScotland</p>	
<b>Summary of responses</b>	
<p>There was general support for the preferred option, however, the following points were also raised:</p> <ul style="list-style-type: none"> <li>• <b>Ms Susan Dick and G Parton</b> are of the view that the canal should be left to wildlife and nature. They state that the wildlife areas are being destroyed everywhere for commercial, residential and even leisure uses. They are firmly of the opinion that natural areas are needed in West Dunbartonshire and are not in favour of more cafes or shops as there are plenty of places for commercial uses but there are fewer areas of untouched, natural wildlife and they need to be preserved for future generations to enjoy.</li> <li>• <b>Parkhall, North Kilbowie and Central Community Council:</b> concur with the preferred option but they do not think that trying to “improve the canal for leisure and recreation” is very realistic. Many millions of pounds have been lavished on the Forth and Clyde Canal in recent times but the outcomes in many cases have been poor.</li> <li>• <b>Clyde Retail Park</b> support a design-led approach which would improve connections for pedestrians between the town centre and the Clyde Retail Park. This approach would also seek to establish a stronger evening</li> </ul>	

economy within the town centre and aim to extend this to the Clyde Retail Park. In parallel with the implementation of these approaches, it would also be logical to designate Clyde Retail Park within the town centre boundary.

- **Bonhill & Dalmonach Community Council** state they are not clear on how a design-led approach would work and list a number of questions on this matter. The Community Council would support proposals to improve the Forth and Clyde canal for recreation, but state that the types of night time economy cannot be to the detriment of the amenity of the area, nor can it result in an over concentration of bad neighbour developments in one area or have them across three areas such as the Town Centre, retail centre as well as the canal.
- **VisitScotland** state that the integration of the canal as a community/heritage/tourism/recreation/leisure/transport asset and investment catalyst is an important consideration and neighbouring local authorities are already exploring action plans that embrace the waterways network and Scottish Canals as strategic and commercial partners.
- **SNH** support the preferred option and agree that a design-led approach should be undertaken for the site, including consideration of its relationship to the canal as an important strategic green network. SNH recommend that clear developer requirements and developer contributions should be set out in the Proposed LDP.
- **SEPA** advise that they have no comments to make on this issue.
- **SportScotland** support the preferred option and state that new development should incorporate existing and provide for new walking and cycling infrastructure and should link to both functional and recreational networks, including to routes that may extend into the wider countryside. Multi-use should form the starting point providing shared use for walking and cycling. They welcome the reference to future opportunities for leisure and recreation as this may include sporting uses linked to the canal-side location with benefits for sport.

#### **Our response**

The Council acknowledges the need to maintain the natural beauty of the canal; however, disagrees that this cannot be maintained whilst sensitively introducing uses within town centre which creates a night time economy. By making more recreational use of the Canal, it will help with creating walkable communities whilst introducing activities which make the Canal a focal point for activity.

The Council were successful in obtaining funding from the Scottish Government's Making Places Fund to take forward further design and community capacity building work in relation to this Issue. Consultants have been appointed to undertake this project which focuses on Clydebank Town Centre and the Forth and Clyde Canal. The Final report, masterplan etc is due by the end of May 2018. Where practical this will be included within Local Development Plan 2 but is more likely to form Supplementary Guidance to the Plan.

<b>Issue 10</b>	<b>The Lomond Canal</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The preferred option is for the proposed route of the Lomond Canal to be removed from Local Development Plan 2 as it is unlikely to be delivered in the short to medium term. Full consideration of its environmental impact has not taken place within the period of the Proposed Plan (2016). By removing the route from Local Development Plan 2 any uncertainty regarding its potential impact on development sites would also be removed. The Plan should also remove its support for a project that is not being progressed and is restricting development on other sites.</p> <p><b>Alternative Option:</b> The Local Development Plan should continue to 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.</p>	
<b>Responses received from</b>	
<p>Jeremy Watson, Parkhall North Kilbowie and Central Community Council, Silverton and Overtoun Community Council, Loch Lomond and the Trossachs National Park Planning Authority, Bonhill and Dalmonach Community Council, VisitScotland, Vale of Leven Trust, SNH, SEPA, Clydebelt, SportScotland, Scottish Water.</p>	
<b>Summary of responses</b>	
<p>The majority of those who responded supported the preferred option to remove the proposed route of the Lomond Canal from Local Development Plan 2, as it is generally considered over-ambitious and undeliverable. The following points were also raised:</p> <ul style="list-style-type: none"> <li>• <b>VisitScotland</b> supports the alternative option and considers the scheme could be transformational for the area.</li> <li>• <b>Sportscotland</b> encourages any proposals which would maximise opportunities for canal-side recreational and leisure activities. Concern about impact on existing communities was raised, although it could be beneficial if offering permanent solution to flooding in Dumbarton (Vale of Leven Trust).</li> </ul>	
<b>Our response</b>	

It is agreed that this proposal has deliverability issues and safeguarding the route in the plan has certain disadvantages. No progress has been made over the lifetime of the current Plan.

Local Development Plan 2 will therefore remove the route of the proposed Lomond Canal and any reference to safeguarding the route and supporting its development from the Plan.

<b>Issue 11</b>	<b>Bowling Basin</b>
<b>Preferred Option and Alternative Option</b>	
<p>The minor revisions to the existing strategy were not considered to be a Main Issues on their own. Therefore, there is no preferred or alternative option.</p>	
<b>Responses received from</b>	
<p>Parkhall North Kilbowie and Central Community Council,  Silverton and Overtoun Community Council,  Bonhill and Dalmonach Community Council,  G Parton,  VisitScotland,  Clyde Marine Planning Partnership,  Susan Dick,  Lesley McEwan,  SNH,  SEPA,  Clydebelt.</p>	
<b>Summary of responses</b>	
<p>There is general support for the strategy for Bowling Basin. The following points were also raised:</p> <ul style="list-style-type: none"> <li>• <b>Parkhall North Kilbowie and Central Community Council, Silverton and Overtoun Community Council and Bonhill and Dalmonach Community Council</b> support revising the strategy as proposed and in addition suggest the need for improvements to Bowling Harbour.</li> <li>• <b>G Parton, Susan Dick, Lesley McEwan and Clydebelt</b> request that the woodland areas are kept as natural as possible and retain existing flora.</li> <li>• <b>G Parton, Susan Dick</b> are of the view that there should be no housing on land between the Clyde and the canal. There is also the need to enhance equestrian access.</li> <li>• <b>Clyde Marine Planning Partnership</b> highlight that a recent publication on sea level rise and storm surges in the Firth of Clyde should be considered in order to direct development away from coastal areas at risk of future flooding.</li> <li>• <b>SNH</b> are very supportive of enhancement of waterfront areas and improved access; however there is a need to ensure that there is no adverse impact on the Inner Clyde SPA.</li> </ul>	

<b>Our response</b>
<p>There is general support for the strategy for Bowling Basin and therefore the revisions to the strategy based on the Masterplan will be undertaken.</p> <p>Local Development Plan 2 will also ensure that any development proposed will take into consideration the revised advice on future flood risk and ensure that there is no adverse impact on the SPA. The proposed green network enhancements will be required to take into account comments regarding the woodland areas.</p>

<b>Issue 11</b>	<b>Alexandria Town Centre</b>
<b>Preferred Option and Alternative Option</b>	
<p>The proposed revisions to the existing strategy to reflect development progress on housing opportunity sites at Kippen Dairy and Leven Cottage was considered to be a minor revisions and therefore it was not a Main Issue on its own. As a result, there no preferred or alternative option.</p>	
<b>Responses received</b>	
<p>Bonhill &amp; Dalmonach Community Council,  Vale of Leven Trust,  Alice Fletcher (Your Place, Your Plan event),  Anonymous respondent (both Your Place, Your Plan event)</p>	
<b>Summary of responses</b>	
<p>The following points were raised in relation to Alexandria Town Centre:</p> <ul style="list-style-type: none"> <li>• <b>Bonhill &amp; Dalmonach Community Council and the Vale of Leven Trust</b> suggest a Simplified Planning Zone.</li> <li>• <b>Vale of Leven Trust</b> seek further detail on new developments/investment in the town including former medical centre site and would like to see additional parking and raise issue with parking in surrounding streets.</li> <li>• <b>Alice Fletcher</b> is of the view more retail provision and leisure facilities such as soft play, clothes and shoe shops are required.</li> <li>• <b>Anonymous respondent</b> asked why replace old flats and shops in Alexandria with more shops and flats (with flat roofs); stated the need for more facilities to cater for population if building more houses; and raised issues with the A82 from Lomondgate to Luss particularly if there's an accident.</li> </ul>	
<b>Our response</b>	
<p>A Simplified Planning Zone needs careful consideration as it would relax planning restrictions and allow more permitted development which could result in possible undesirable town centre uses. It is important to note that there is no core retail area restriction in Alexandria like Dumbarton and Clydebank; therefore, other uses could be acceptable within the Town Centre without the need for an Simplified Planning Zone.</p> <p>Therefore, it is intended to make the revisions to the existing strategy within Local Development Plan 2 and it is not proposed to take forward a Simplified Planning Zone for Alexandria Town Centre due to the size of Alexandria itself and the potential delays this could have on the preparation of the Proposed Plan.</p>	

<b>Issue 11</b>	<b>Carless</b>
<b>Preferred Option and Alternative Option</b>	
<p>At the time of writing the Main Issues Report there had been some interest shown in the site, but no proposals had progressed to the planning application stage. At that point, the existing strategy was considered to be relevant and, as a result, Carless wasn't considered to be a Main Issue.</p>	
<b>Responses received</b>	
Peter Brett Associates on behalf Malin Group Properties Ltd	
<b>Summary of responses</b>	
<p>The response seeks changes to the existing strategy for Carless. The Malin Group request that Local Development Plan 2 should allow for, and promote, a phased approach to development with the removal of the requirements for a comprehensive masterplan and remediation strategy and should contain a development strategy for the Carless site. This would set out high level development parameters for the site, identifying the initial and subsequent phases of development on the site in a sequential manner, alongside indicative land uses. By allowing for the phased approach to development (alongside the necessary phasing of remediation works), it would permit works to proceed in an expedient way that is aligned with the financial viability of each phase. The Malin Group would also work with the Council to develop a development strategy and would be guided by the principles currently set out in Main Issue 12: Creating Places.</p> <p>The Malin Group state that the advantages of this approach are that it allows development to proceed in a phased manner according to the needs of each phase, without having to prepare proposals for the whole site before the plans for the eastern area are fully crystallised. At the same time, it provides the Planning Authority with the assurance of a development strategy for the site that is embedded in Local Development Plan 2 and that can be used to assess planning applications for future phases. It is considered that this approach balances the commercial considerations of site development with the need for a co-ordinated approach to planning.</p> <p>The Malin Group also state, in relation to the two references to the site within Chapter 5 of the Main Issues Report, that this dual reference to the site under two separate headings is confusing and that it would be better to identify it as a mixed use redevelopment opportunity, recognising that the site is potentially suitable for both business and industry and, in parts, for housing.</p>	
<b>Our response</b>	
<p>Local Development Plan 2 will provide an updated Development Strategy and place based policies for the Carless site which give certainty to the developer but also to ensure that as, one of our key regeneration sites, the uses of the site are appropriate to its context; that the current proposals for green network enhancement as contained within the Proposed Plan are reflected and delivered;</p>	

and ultimately that the site is brought back into active use.

<b>Issue 11</b>	<b>Kilpatrick Hills</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The current strategy for the Kilpatrick Hills remains relevant, appropriate and is in accordance with the Renewable Energy Planning Guidance. Wind energy proposals will be supported where they involve small/medium scale turbines located within less visually prominent parts of the Kilpatrick Hills. Wind energy developments involving large/very large scale turbines are unlikely to be supported.</p> <p><b>Alternative Option:</b> An alternative option would be to have a more open approach to large and very large scale wind turbines where the benefits of providing renewable energy are considered to outweigh the impact on the local landscape.</p>	
<b>Responses received from</b>	
<p>Mr John Mullen,  Parkhall North Kilbowie and Central Community Council,  Silvertoun and Overtoun Community Council,  Loch Lomond and the National Park Planning Authority,  Bonhill &amp; Dalmonach Community Council,  G Parton,  VisitScotland,  Susan Dick,  Lesley McEwan,  Vale of Leven Trust,  SNH,  Stirling Council,  SEPA,  Clydebelt,  East Dunbartonshire Council,  John Smith SCOTPLAN,</p>	
<b>Summary of responses</b>	
<p>Most responses are in favour of the preferred option of keeping the existing policy with regard to windfarm development in the Kilpatrick Hills. The additional points were also made:</p> <ul style="list-style-type: none"> <li>• <b>Silvertoun and Overtoun Community Council</b> state that the Local Development Plan should make reference to Lang Craigs Community Woodland, on Maryland Farm and the surrounding 400 hectares, to the immediate north-east of Dumbarton, and owned by the Woodland Trust. It is a valuable community resource and western gateway to the Kilpatrick Hills.</li> <li>• <b>Bonhill &amp; Dalmonach Community Council</b> are concerned about proposals for Papperthill Windfarm – it would harm visual amenity, scenery, wildlife and community use of the area - should this be a separate</li> </ul>	

Main Issue. Would like clarification in the Local Development Plan on what constitutes small/medium/large scale turbines. Would also like clarification on Policy DS2 - Green Belt zoning along with Policy GN4 Local Landscape Area Designation, in particular, the area to the north east and east of Dumbarton. Unclear which Policy took precedence, or whether this meant there was double protection for these areas. This should be made clearer in the next iteration of the Plan.

- **G Parton** disagrees with all Main Issues Report options and feels that no wind developments of any scale should be allowed.
- **Susan Dick** is of the opinion that no wind developments of any scale should be allowed.
- **Vale of Leven Trust** state that the Council appears to support a windfarm at Papperthill and enquire how does that proposal relate to the Policy and as a Council-led project should it not be a Main Issue? Need clarification in LDP of what constitutes small/medium/large scale turbines.
- **Stirling Council** fully supports the preferred approach not to allow large scale wind farms into the Kilpatrick Hills. This would accord with their own policy approach.
- **East Dunbartonshire Council** support the preferred approach.
- **John Smith** states that windfarm policy should be criteria based rather than area based. He is also of the view that the Council should also develop a Masterplan for Kilpatrick Hills to also include tourism and access opportunities/potential.
- **Loch Lomond & Trossachs National Park Planning Authority** support the existing strategy and preferred option. Any proposals in the Kilpatrick Hills should ensure that they do not have an adverse impact on the special landscape qualities of the National Park.

#### **Our response**

This Main Issue relates specifically to wind energy policy for the Kilpatrick Hills, so greenspace/tourism issues will be addressed under the relevant Main Issues Report heading. As part of the update to the 'Our Green Network' planning guidance, there will be an opportunity to make greater reference to the Lang Craigs Community Woodland, which is only briefly mentioned in the current guidance.

There is general support for the preferred option and no additional information has been presented to suggest this is not appropriate. Local Development Plan 2 will therefore proceed with the implementation of the preferred option.

<b>Issue 11</b>	<b>Green Network</b>
<b>Preferred Option and Alternative Option</b>	
<p>The current strategy will require be updated to more accurately reflect the agreed “Our Green Network” Planning Guidance. However, these are revisions and are not considered to be a Main Issue on their own and have already been subject to consultation through the preparation of the Planning Guidance document.</p>	
<b>Responses received from</b>	
<p>Susan Dick Vale of Leven Trust SEPA Clydebelt G Parton Faifley Community Council</p>	
<b>Summary of responses</b>	
<p>The following comments were raised in relation to the Green Network:</p> <ul style="list-style-type: none"> <li>• <b>Susan Dick</b> stated that more provision should be made for horse riding areas/routes. Green network approach is focussed too much on new play parks and there should be greater attention on creating new greenspaces and equestrian routes.</li> <li>• <b>Vale of Leven Trust</b> is of the view that there should be greater provision of cycle and pedestrian routes within road infrastructure to reduce dependence on cars. They support the provision of better active travel routes for commuters and would welcome the opportunity to work alongside the Council in getting the right routes in place. The Trust is fully supportive of the existing strategy to safeguard the Green Network and suggests that further enhancements to the network should be provided; cycle provision should be increased and further connections to green space should be made.</li> <li>• <b>SEPA</b> consider Local Development Plan 2 should include ‘blue networks’ and should link green network with improvements to the water environment, as required by the Water Framework Directive and river basin planning. Multiple benefits could be realised for integrated habitat networks, biodiversity, flood management etc. SEPA welcome the preferred approach and acknowledge that the current strategy proposes a direct connection with delivery at site level as part of development briefs and design frameworks.</li> <li>• <b>Clydebelt</b> support the Main Issues Report strategy but request that wildlife corridors are built into and enhanced as part of green network to help protect and promote wildlife diversity.</li> </ul>	

- **G Parton** is of the view that no parks and natural spaces are being created by the Council only play parks. Better equestrian routes are required – e.g. at Overtoun House and disused railway lines are required.
- **Faifley Community Council** state that maintenance of open spaces, woodlands and green networks/routes is poor: paths are overgrown and blocked, and it encourages fly tipping and vandalism and discourages outdoor access. They are of the view that the Council needs to improve access and surfaces of paths. Also need to improve and replace play areas, some of which were lost in the 1980's and were never replaced.

#### **Our response**

The policy detail and site guidance for greenspace is set out principally in the “Our Green Network” Guidance. This is being reviewed alongside the preparation of Local Development Plan 2.

The Council will review whether a “blue network” of river basins should be identified and better integrated with the Green Network: however SEPA's comments appear to overlook that the existing Strategy already recognises the Rivers Clyde and Leven and the canal as part of the Green Network. As such, it may be more appropriate to consider whether the network could be re-labelled.

The responses concerning specific open spaces and maintenance will be forwarded to the Greenspace Team.

<b>Issue 12</b>	<b>Creating Places</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The preferred option is to expand on Policy DS 1 of the Proposed Plan (2016) and develop a suite of policies to ensure that new development considers the needs of people first and that new places are integrated into existing neighbourhoods and communities, thereby ensuring that liveable and walkable places are created.</p> <p>The Council will establish a framework within Local Development Plan 2 which allows for place-making maps to be produced, in conjunction with communities, taking into account the place standard. Place-making maps will help to focus on what improvements are required which can be delivered through Local Development Plan 2, to help improve the quality of existing places.</p> <p>Local Development Plan 2 will give much more visual and design guidance on how medium to large-scale sites, or sites within sensitive areas, should be developed and integrated with existing communities. Local Development Plan 2 will illustrate, for example, where connections should be made; where development and green infrastructure could be located; how development should be orientated etc. These design guidelines should be incorporated into the layout of the site by the developer.</p> <p><b>Alternative Option:</b> The alternative option is to continue with the approach advocated in the Proposed Plan (2016). This is not the preferred option. Local Development Plan 2 requires a much stronger emphasis on place to ensure that development creates new high quality places and strengthens existing ones by putting people first and involving the community in the production of placemaking plans to enhance the attractiveness of existing places and West Dunbartonshire as a whole.</p>	
<b>Responses received</b>	
<p>Mrs MacKay,  Parkhall Community Council;  Silvertoun and Overtoun Community Council;  Persimmon Homes;  Bonhill &amp; Dalmonach Community Council;  VisitScotland;  Cameron Planning on behalf of Taylor Wimpey;  Homes for Scotland;  Vale of Leven Trust;  SNH;  SEPA;  East Dunbartonshire Council</p>	

## Summary of responses

There was general support for the preferred option; however, the following points were also raised.

- **Mrs Mackay** supports the renovation of pavilion at Mountblow playing fields only if good quality materials used.
- **Parkhall, North Kilbowie & Central Community Council** state that creating high quality spaces in the public and private domains is a very desirable aim. Ambitious initiatives abound but they nearly always lack the planning, funding and persistence to ensure their long term viability. A good example of such failure is the raised beds along the centre of Dumbarton Road and Glasgow Road in Clydebank. They agree that the Local Development Plan 2 should give much more visual and design guidance on how sites should be developed especially to avoid passing architectural fads like timber cladding and deliberately rusting metal.
- **Silvertoun and Overtoun Community Council** agree with the preferred option in principle, but do not feel qualified to comment in detail. They are aware, however, of the placemaking maps idea, and will be exploring this idea at a strictly local (Silvertoun and Dumbarton East) level in the coming months. They are strongly in favour of each town and village having identifiable identities; of giving greater consideration to visual and design guidance on developments, in particular the incorporation wherever possible of green infrastructure.
- **Persimmon Homes** state that clear and concise policies will ensure that developers can address design requirements whilst ensuring that development viability is not compromised. Key to this is also recognising that no two developments are the same and the way policies are applied should reflect this. The creation of the new Design Panel and Design Officer post will also be of assistance in ensuring that design and place-making form part of initial pre-application discussions.

They are of the view that sites promoted for development would benefit from 1-2 page design briefs to accompany diagrams detailing how a site could be developed. These briefs would be informed by Call for Sites submissions and discussions with landowners/developers in order to set out opportunities and constraints. There should however be scope through pre-application design discussions to allow for alternative approaches to site development to be justified where they do not conform fully to potential briefs/place-making maps.

- **Bonhill & Dalmonach Community Council** support a range of policies aimed at creating new places and delivering high quality development. It is key that development proposals integrate well into existing neighbourhoods and communities and support liveable and walkable places.

Although the Plan may provide more clarity and certainty on the standards of new development, the Council as whole should aim to adopt this

approach as the Community Council currently find that the current policies & procedures of different departments can directly contradict what is best for areas and places. They would like to see the heart put back into communities; however' they feel that at times the different Council departments are at odds with each other which is detrimental to towns and villages. The Community Council propose that each town and village should have identifiable identities that are different in character and that stop the faceless generic town centre look.

The Community Council would welcome the establishment of a framework which allows for place-making maps to be produced but would like more clarification of when the maps would be produced; whether they would be a part of the Proposed Plan and what the involvement of the Community Council would be in influencing these place-making maps.

- **VisitScotland** support the preferred option.
- **Taylor Wimpey** note the content of this Main Issues Report.
- **Homes for Scotland:** state that the LDP should ensure that it is as clear as possible in its expectations and aspirations regarding new places and quality of developments. The Council must also be reasonably flexible and pragmatic in how any policy is applied and should accept that there may be circumstances and clear reasons given as to why a particular approach cannot be adopted without adversely affecting development viability. Delivering sufficient new homes to meet all housing needs and demands must remain a priority.

In relation to the production of place-making maps, Homes for Scotland would support the principle of this in that it can provide a clear view of settlement wide expectations and aspirations. However, Local Development Plan 2 is a key policy document that must also contain clear and unambiguous policy statements to reduce the level of necessary interpretation and assumption that could arise with an over-reliance on visual presentation.

- **Vale of Leven Trust** support a range of policies aimed at creating new places and delivering high quality development and support liveable and walkable places particularly in relation to many of the comments provided above. However although the Plan may provide more clarity and certainty on the standards of new development, the Council, as a whole, should aim to adopt this approach as the current policies and procedures of different departments can directly contradict what is best for areas and places. It is a key ambition within the Trust to see the heart put back into local communities; however, they feel that at times the different Council Services appear at odds with each other about this issue and this is something which can only be detrimental to our towns and villages.

The Trust would welcome the establishment of a framework that allows for place-making maps to be produced. They suggest that each town &

village is developed with their individual and identifiable identities and want a mandatory requirement for all reasonable sized developments, regardless of developer to provide in depth visual and graphic information at the pre-planning stage.

**SNH** support the continued emphasis on place and the ambition to deliver high quality places and development. In particular they welcome the intention to ensure that new development considers the needs of people and the emphasis on the need to deliver well integrated, liveable and walkable places. SNH also support the inclusion of place making maps and highlight green infrastructure and active travel considerations, the likely relationship to the green network strategy and the need for alignment. Further support is given to the intention to provide more visual and design guidance. They highlight the range of design tools set out in paragraph 57 of Scottish Planning Policy.

- **SEPA** advise that this main issue is unlikely to prejudice their interests provided that Policies DS1 – DS8 (revised versions) continue to be an integral part of the decision making process and that they are used in conjunction with the proposed use of place-making maps. They should jointly better deliver high-quality development. In the place-making maps SEPA would encourage highlighting the presence of blue corridors/the water environment and the buffer strips/ no development zones that should be provided in these areas, linking to the provision of green infrastructure and again visual presentation of this in allocated sites better defines the developable footprint of the site.
- **East Dunbartonshire Council** is supportive of the preferred option to develop a suite of policies, ensuring new development considers the needs of people first to create liveable and walkable neighbourhoods and communities. This reflects their policy position of taking a design-led approach, as set out in Policy 2 of their adopted Local Development Plan and the Design and Placemaking Supplementary Guidance.

#### **Our response**

Local Development Plan 2 will provide a suite of design policies that aim to raise the standard of design. Careful consideration will be given to ensure that development viability is not affected; however, these policies will be a step change and it will be up to the development industry to embrace them in order to create a place that people want to live, invest, visit and explore. Local Development Plan 2 will also require to give policy weight to the work of the Place and Design Panel and when the panel should be consulted.

It is proposed that visual design guidance for sites will take the form of development briefs to be contained within Supplementary Guidance due to the time required to prepare these.

In relation to placemaking, the Council is currently looking at how locality planning can be incorporated within Local Development Plan 2 and as such, placemaking

maps may be better undertaken as part of Locality Planning. Locality plans will also have to reflect the comments in relation to green and blue networks

Consideration will be given on how Local Development Plan 2 will incorporate and give policy weight to the provisions of the Locality Plans. However, locality plans will have to consider spatial planning and placemaking within them in order to be adopted as Supplementary Guidance.

Issue 13	Private Sector Housing Land
<b>Preferred Option and Alternative Options</b>	
<p><b>Preferred Option:</b> The preferred option is to allocate the following additional sites, which were promoted as part of the Call for Sites exercise, to increase the range and choice of private sector housing land: Dumbain Crescent, Haldane (2.2 ha); Former Carman Waterworks, Renton (2-3 units); Bonhill Quarry, Bonhill (139 units); Castle Road, DFC Stadium, Dumbarton (4.5 ha); Beardmore Place, Clydebank (in part) (24 units); Hardgate Health Centre, Hardgate (0.13 ha); Clydebank Health Centre (1.0 ha); and Strauss Avenue, Clydebank (in part) (4.2 ha)</p>	
<p><b>Alternative Option 1:</b> As well as the sites listed above, four other sites, which were promoted as part of the Call of Sites exercise, should also be allocated. These sites are: Overtoun Road, Alexandria (13 units); Youngs Farm, Dumbarton (10.0 ha); Dumbuckhill, Dumbarton (420 units) and Faifley Bowling Club, Faifley (1.0 ha). It is considered that there is no need for additional land release at the scale proposed at Dumbuckhill and Young's Farm, which would also have adverse environmental impacts. Similarly, it is important to protect open spaces, especially where they are of benefit to the community; therefore, it is considered that Overtoun Road and Faifley Bowling Club should not be allocated for residential uses.</p>	
<p><b>Alternative Option 2:</b> No additional sites are allocated. This option would not accord with Scottish Planning Policy as this approach will not increase the range and choice of housing sites</p>	
<b>Responses received</b>	
<p>Homes for Scotland, Knowes Housing Association, Claire Marshall, Stuart Macdonald, Claire MacDonald, Pierre de Fence, NHS Greater Glasgow and Clyde, Parkhall North Kilbowie and Central Community Council, Silverton and Overtoun Community Council, Persimmon Homes, Jessie Turner/Hugh Kinloch, Bonhill and Dalmonach Community Council, Savills on behalf of Logan Factoring and Management, SNH, Vale of Leven Trust, SEPA, Clydebelt, Cameron Planning on behalf of Taylor Wimpey, Houghton Planning on behalf of Church of Scotland, Keppie Planning on behalf of Craigelvan, Montagu Evans on behalf of Dumbarton Football Club, SNH and Systra on behalf of Transport Scotland.</p>	
<b>Summary of responses</b>	
<ul style="list-style-type: none"> <li><b>Homes for Scotland</b> state that housing supply targets should be updated to reflect the approved SDP. The Housing Land Audit 2017 as agreed by Homes for Scotland and the supported at that time the deletion of some non-effective sites, with the addition of <b>Bonhill Quarry, Carless, North Douglas Street and Dalquhurn</b>. Despite agreeing the 2017-24 programming, <b>Homes for Scotland</b> are now saying it is a reasonable assumption that only 80% of this programming is 'reasonable', and that that would result in a 'finely balanced' supply to meet targets, and to be 'truly generous' there should be additional allocations. <b>Persimmon Homes</b> similarly are of the view that additional allocations are required.</li> </ul>	

- **NHS Greater Glasgow and Clyde** support the inclusion of Clydebank and Hardgate Health Centres.
- **Knowes Housing Association, Claire Marshall, Claire MacDonald, Stuart Macdonald and Pierre de Fence** request that Faifley Bowling Club is allocated for affordable housing . However, **Clydebelt** are of the view that the site should not be developed for housing but for allotments or community gardens due to density and road congestion.
- **Vale of Leven Trust and Bonhill and Dalmonach Community Council** are concerned that too many flats are being built with no regard for the services and infrastructure that will be required.
- **Parkhall North Kilbowie and Central Community Council and Silverton and Overtoun Community Council** agree with the preferred option.
- **Bonhill and Dalmonach Community Council and the Vale of Leven Trust** do not agree that Dumbain Crescent, Former Carman Waterworks, Bonhill Quarry and Overtoun Road should be allocated.
- **Bonhill and Dalmonach Community Council** is of the view that Strauss Avenue and Dumbuckhill should not be allocated.
- **Jessie Turner on behalf of Hugh Kinloch** support the continuing allocation of Jamestown IE BC2(7) and it's extension into industrial area GE1(14).
- **Savills on behalf of Logan Factoring and Management** support the allocation of Strauss Avenue for residential development of 100 houses.
- **SEPA** do not objection to preferred approach, but advise that the development footprint of some sites could be constrained by flood risk.
- **Silverton and Overtoun Community Council, Bonhill and Dalmonach Community Council and the Vale of Leven Trust** object to Young's Farm being allocated for development.
- **Clydebelt** is of the view that Old Mill Garage should only be developed to south of the burn. **SEPA advise** that any development of the site should be outwith the functional floodplain. **Clydebelt** is also of the view that William Street should be withdrawn as a site.
- **Taylor Wimpey** seek the allocation of Duntiglennan Fields for residential development.
- **The Church of Scotland** seek the allocation of Old Kilpatrick Glebe for limited residential development.

- **Dumbarton Football Club** seek the allocation of Young's Farm for residential use.
- **Craigelvan** seeks the allocation of a site on Main Street, Jamestown for allocation for 3-4 residential units.

#### **Our response**

It is agreed that the LDP will conform to the approved SDP with the amended Housing Land Requirement. It is not considered the land supply position requires any further allocations to meet this requirement.

In relation to the comments raised with regard to specific sites, the review of these sites is still ongoing. The responses to the Main Issue Report in this regard will form part of the Proposed Plan.

<b>Issue 14</b>	<b>Affordable Housing</b>
<b>Preferred and Alternative Option</b>	
<p><b>Preferred Option:</b> There is no justification or evidence contained within the Local Housing Strategy (2017 – 2022) for an Affordable Housing policy in West Dunbartonshire. The More Homes Better Homes aspirations of the Council can be delivered within the current generous land supply and through the financial support available to the Council from the Scottish Government. The inclusion of such a policy could reduce the viability of private sector sites. Instead, land will continue to be allocated for Affordable Housing in the Plan.</p>	
<p><b>Alternative Option:</b> An Affordable Housing policy requiring a percentage contribution towards meeting Affordable Housing requirements from every private sector housing site would be introduced. This could have an adverse impact on the delivery of private housing.</p>	
<b>Responses received</b>	
<p>Parkhall, North Kilbowie and Central Community Council,  Silverton and Overtoun Community Council,  Persimmon Homes,  Bonhill and Dalmonach Community Council,  Savills on behalf of Logan Factoring and Management,  Homes for Scotland,  Swan Real Estate PLC,  Vale of Leven Trust,  SEPA,  Scottish Water.</p>	
<b>Summary of responses</b>	
<p>There is general agreement with the preferred option that whilst there is a desire to see more affordable homes provided, <b>Persimmon, Bonhill and Dalmonach Community Council, Logan Factoring and Management, Homes for Scotland, Swan Real Estate, Vale of Leven Trust</b> agree that there is no justification for an affordable housing policy to achieve this goal.</p>	
<p>Whilst agreeing with the preferred option, <b>Parkhall, North Kilbowie and Central Community Council and Silverton and Overtoun Community Council</b>, consider that the private housing sector should provide a certain percentage of affordable housing on their sites where possible.</p>	
<b>Our response</b>	
<p>We welcome the general support to the preferred approach to the delivery of affordable housing.</p>	
<p>The approach to affordable housing provision will therefore not change within Local Development Plan 2 and no percentage affordable housing contribution will be required from private developers, but a generous supply of land for social rented housing will be allocated in the Plan.</p>	

<b>Issue 15</b>	<b>Business &amp; Industrial Land Supply</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The Council will undertake a comprehensive review of business and industrial land supply within West Dunbartonshire. Based on the outcomes of the review, it will consider whether further business and industrial land should be allocated within Local Development Plan 2 or, where appropriate, existing sites should be re-allocated to suitable alternative uses. This approach will ensure that the Council will have an up to date effective and marketable supply of business and industrial land allocated within Local Development Plan 2.</p> <p><b>Alternative Option:</b> The alternative option will continue to implement the approach to business and industrial land as detailed within the Proposed Plan (2016). This approach is not considered to be in accordance with the provisions of Scottish Planning Policy as a review of business and industrial land supply will not have been undertaken. This approach could also provide a barrier to new Investment within the area as the safeguarded business and industrial sites may not be attractive to the market, which could result in potential new businesses with an interest in moving to West Dunbartonshire choosing to locate elsewhere. Also it could involve existing business moving outwith the area, due to a shortage of land for relocation and/or expansion which meets their requirements.</p>	
<b>Responses received</b>	
<p>Dalglish Associates Limited on behalf of William Thompson &amp; Son (Dumbarton) Ltd,  Parkhall, North Kilbowie &amp; Central Community Council,  Silverton &amp; Overtoun Community Council,  Persimmon Homes,  Bonhill &amp; Dalmonach Community Council,  Vale of Leven Trust,  Smith Muir Evans on behalf of Chivas,  SEPA,  East Dunbartonshire Council,  Susan Cuthbert</p>	
<b>Summary of responses</b>	
<p>There was a general consensus in favour of the preferred option; however, the following points were also raised:</p> <ul style="list-style-type: none"> <li>• <b>Dalglish Associates Ltd</b> propose a new allocation for industrial land adjoining Sheephill Quarry.</li> <li>• <b>Parkhall, North Kilbowie &amp; Central Community Council and Silverton &amp; Overtoun Community Council</b> agree that the Council should undertake a review of industrial/business land and should resist development within the greenbelt.</li> <li>• <b>Parkhall, North Kilbowie &amp; Central Community Council</b> also suggest that the Council should support small businesses in finding suitable</li> </ul>	

premises and Rosebery Place should be considered for start-ups.

- **Persimmon Homes** suggest that the Council should consider alternative uses in industrial areas, in appropriate locations.
- **Bonhill & Dalmonach Community Council and the Vale of Leven Trust** support the industrial/business land review and suggest that there is an oversupply.
- **Chivas** agree with the option to undertake a review of industrial and business land and wish to see their proposals for expansion reflected in Local Development Plan 2.
- **SEPA** outline that this issue is unlikely to prejudice their interests provided any existing sites where the 'use' class is changed are fit for purpose.
- The preferred option is supported by **East Dunbartonshire Council** and **Susan Cuthbert**.

#### **Our response**

The Council have commissioned Ryden to undertake the Business and Industrial Review and the findings of that report will be incorporated into Local Development Plan 2. The Council will also give due consideration to the request from the Community Councils that the plan can further encourage start up business. The Clydebank Town Centre Charrette indicated that the preferred use for Roseberry Place was for residential. Further consideration will be given to including small scale business use within the site.

Ryden are also investigating if the approach promoted within the Planning Guidance for Clydebank Business Park is suitable for other business and industrial areas. The Council will give due consideration to the findings of Ryden when the report is received.

The recent consent for expansion of Chivas will be reflected in the Plan, or if development is underway soon, it should be reflected as existing industry and business. This should be considered in line with any changes that are proposed in relation to representations and the preferred option in relation to Main Issue 5: Vale of Leven Industrial Estate.

In relation to Sheephill Quarry, should the Ryden study indicate that new business and industrial land is required then the request to allocate business and industrial land next to the Quarry will be considered further.

Local Development Plan 2 will reflect the findings of Ryden's report, which will also form a Background Report as part of the Plan.

<b>Issue 16</b>	<b>Retail Core in Town Centres</b>
<b>Preferred Option and Alternative Options</b>	
<p><b>Preferred Option:</b> The retail core policy applicable to Clydebank and Dumbarton town centres should be less restrictive towards uses which are considered as being suitable for a vibrant town centre, such as cafes and restaurants, dentists, offices for the visiting public. The policy (or similar) should also be in accordance with the provisions of the Pay Day Lending and Betting Shops planning guidance (2016). This is the preferred option as it will encourage a mix of suitable town centre uses whilst also allowing protection against over-provision/clustering of uses, such as pay day lending and betting shops.</p> <p><b>Alternative Option 1:</b> This alternative option proposes that the existing retail core policy, which currently requires further (criteria-led) assessment of all non-Class 1 proposals within the identified ground floor units of the retail core, is retained. This option is not preferred. It does not actively encourage support for a further mix of suitable town centre uses which could affect the attractiveness of the town centres as shopping destinations. This may be seen as a barrier to potential occupiers and make the town centres less favourable locations. This approach could also discourage the occupancy of vacant units, which is particularly an issue for Dumbarton town centre as it has the highest vacancy rate of the three town centres within West Dunbartonshire.</p> <p><b>Alternative Option 2:</b> This alternative option proposes the removal of the retail core policy and to have no policy restrictions in order to retain Class 1 uses within the town centres. This option is not preferred. Complete removal of the policy and consideration of the recent planning guidance may risk an over-provision/clustering of less favourable uses, such as betting offices and pay day loan shops, to the detriment of the town centres.</p>	
<b>Responses received from</b>	
<p>Parkhall etc Community Council  Silverton &amp; Overtoun Community Council  Savills(Valad) Clyde Retail Park  Bonhill &amp; Dalmonach Community Council  Visitscotland  Vale of Leven Trust  SEPA  East Dunbartonshire Council  Susan Cuthbert</p>	
<b>Summary of responses</b>	
<p>There was strong general support for the preferred option. The following points were also made:</p> <ul style="list-style-type: none"> <li>• <b>Silverton &amp; Overtoun Community Council</b> state that there is a strong case for radically altering Dumbarton High Street; restricting vehicle</li> </ul>	

parking and encouraging 'through traffic' from a more-pedestrianised High Street to an improved riverside area, and a pedestrian bridge across the Leven. Perhaps even opening the west side of the High Street.

- **Savills(Valad) Clyde Retail Park** support a more relaxed policy to attract greater range of uses in Clydebanks town centre, especially leisure. They also state that the Town Centre boundary should include Clyde Retail Park and allow the same flexibility of uses for the retail park.
- **Bonhill & Dalmonach Community Council** support measures to avoid clustering of betting shops, etc. They consider the adoption of a Simplified Planning Zone in Alexandria town centre would be worthwhile as well as preparing a simplified planning zone scheme which can help with clustering but also allow some flexibility for a range of other uses.

The Main Issues Report preferred option should be extended to Alexandria Town Centre - there is a real need for investment and a focus on trying to encourage a range and choice of uses into this centre along with improving the public realm, parking, seating and connections to and from the centre.

- **VisitScotland** is of the view that streetscape experiences (food and drink, performance, public art, exhibition space, cultural activities) will save town centres, as will, the flexible use of buildings and open spaces. They are strongly of the opinion that the Main Issues Report approach should apply to Alexandria too as previous policies appear not to have had desired outcomes.
- **Vale of Leven Trust** consider the adoption of a Simplified Planning Zone in Alexandria town centre would be worthwhile as a well prepared simplified planning zone scheme can help with clustering but also allow some flexibility for a range of other uses. The Trust would like to see all different approaches extended to Alexandria Town Centre and ask why is it excluded? Alexandria and other town centres / villages should start to develop their own unique identity.
- **East Dunbartonshire Council** supports the preferred option, which is similar to the approach to town centres taken by East Dunbartonshire Council.

#### **Our response**

There is strong support for the preferred option to retain core retail areas, but to allow a greater range of uses that complement and support the retail function of town centres.

With regard to Alexandria, the existing Strategy already promotes and supports improvements to the public realm, buildings and accessibility/movement. It also supports significant flexibility to permit a wide range of retail and non-retail uses. Creating core/non-core retail areas in Alexandria would be difficult, due to its

smaller size and as there is no real identifiable 'prime' retail area, where shops dominate. It may also limit the ability to attract a suitable, diverse range of uses to the town centre, and achieve regeneration of key sites.

Similarly, it is not clear that a Simplified Planning Zone would introduce any extra flexibility over the current Strategy that would help attract additional investment or users to the town. Indeed a Simplified Planning Zone may lead to unwelcome or unsuitable uses in the town centre and would potentially entail significant resources to set up (see also response to 'Main Issue 11: Alexandria Town Centre').

It is not considered appropriate to include the Clyde Retail Park within the boundaries of Clydebank Town Centre, or to extend to it the same range of permissible uses as the Town Centre. The Retail Park provides a different, but complementary function to the Town Centre: predominantly bulky-good and food retail uses. Allowing a full range of town centre uses, including leisure, could introduce greater competition with, and divert investment away from, the existing Town Centre. The role of the Retail park and its linkages with the Town Centre will be reviewed through the approach to Stanford Street and the Forth and Clyde Canal as per Main Issue 9.

<b>Issue 17</b>	<b>Heat generation and networks</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> Using the Scottish Government's heat mapping, the Council will investigate opportunity areas where significant developments, such as large scale housing, within such areas should create or link into heat networks. New developments within this area should consider connection to, or creation of, a new heat network. Developers must provide detailed reasoning and financial costings to support why connection to or creation of a new heat network is not viable. From this investigation, the Council will seek to introduce a policy within Local Development Plan 2 to support this and indicate what measures may be required both now and in the future if creating/linking into a heat network is not possible. Consideration will be given to providing Supplementary Guidance if necessary. This option is preferred as it is considered to help support Scottish Government and Council targets.</p> <p><b>Alternative Option:</b> All new developments must create or link into heat networks, regardless of scale or location. This is not the preferred option. Although it would tie in with national targets, it has the possibility of restricting development where it may not be viable and may therefore impact on the delivery of development.</p>	
<b>Responses received</b>	
<p>Parkhall, North Kilbowie &amp; Central Community Council,  Silverton &amp; Overtoun Community Council,  Persimmon Homes,  Bonhill &amp; Dalmonach Community Council,  Homes for Scotland,  Vale of Leven Trust,  SNH,  SEPA,  Clydebelt,  East Dunbartonshire Council</p>	
<b>Summary of responses</b>	
<p>There is general support for the preferred option; however, the following points were also raised:</p> <ul style="list-style-type: none"> <li>• <b>Parkhall, North Kilbowie &amp; Central Community Council and Silverton &amp; Overtoun Community Council</b> are in support of the preferred option and support this for all housing developments where possible.</li> <li>• <b>Parkhall, North Kilbowie &amp; Central Community Council</b> also outline that there must be contingency plans in place for system failures and consideration to residents rights to choose an energy supplier.</li> <li>• <b>Silverton &amp; Overtoun Community Council</b> further urge the Council to condition into planning consents solar heating/micro energy generating/ground source heat schemes where possible into housing and</li> </ul>	

industrial developments. The Community Council would also support applications for such projects.

- **Persimmon Homes and Homes for Scotland** are of the view that district heating systems will not be suitable for all sites and in which case an energy statement outlining this is the case where a development is not close to an existing/proposed heat source or part of a large mixed use development with the potential to share/sell heat. Energy statements can address how developments will address climate change.
- **Homes for Scotland** urge caution in how district heat networks are sought and while they support reducing carbon emission reduction, it must be through a pragmatic and balanced approach. They further outline that for housing developers to deliver such infrastructure and absorb the risks is misplaced and inappropriate; new buildings should avoid specified and rising proportion of project greenhouse gas emissions from their use; improvements have already been made through Building Standards changes and new installations have the potential to be temporary, bring maintenance and user implications; a 'fabric first' approach should be taken through the Local Development Plan policy; and they would not support a detailed quantification of the reduction in greenhouse gas emissions from the use of the proposed development at the planning application stage.
- **Bonhill & Dalmonach Community Council and the Vale of Leven Trust** agree with the preferred option but should extend this further than to just large scale housing developments and link in uses requiring energy over long/consistent periods. They do not see the need for supplementary guidance if a good policy framework is in place.
- **SEPA** support the preferred option and consider that a stronger position is taken requiring all new substantial developments to have their heat demand met through district heating. They recommend that the Local Development Plan /Supplementary Guidance ensures that such new developments incorporate space to be safeguarded for future pipework/piperuns and energy centres, and to provide a robust framework to support a sustainable approach to resource management and specific reference to SEPA's Thermal Treatment of Waste Guidelines when referring to energy from waste. They also encourage an approach in policy DS5 which will incorporate energy from waste plants.
- **SNH, Clydebelt and East Dunbartonshire Council** agree with the preferred option.
- **Clydebelt** further outline that all new buildings should have methods of eco-friendly heat production considered and also suggest the use of the river Leven to produce electricity from turbines.

#### **Our response**

Scottish Planning Policy does not require developers to provide an energy statement. The Council is required by the the Town and Country Planning (Scotland) Act 1997 (as amended) to provide a policy on low and zero carbon buildings which must improve upon the carbon reduction emission standards contained within the Scottish Building Standards (2010). This requirement is contained within Appendix 1 of the Local Development Plan (Proposed Plan) (2016) and it is proposed to review the appendix, update where necessary, and to include it within Local Development Plan 2. Consideration will be given to requiring developers to provide an energy statement demonstrating they have complied with the policy on low and zero carbon buildings.

The comments from Homes for Scotland are understood; however, Scottish Planning Policy provides clear requirements in terms of what Local Development Plan 2 is required to support and provide policy on. Taking this into consideration, there needs to be flexibility on how the policy is implemented in practice and the Council will ensure that the policy, whilst conforming to Scottish Planning Policy, does not provide a significant burden to developers.

Local Development Plan 2 will therefore incorporate a new policy on heat taking into account the requirements of Scottish Planning Policy and SEPA, but ensuring that it is flexible enough not to affect development viability.

<b>Issue 18</b>	<b>Green Infrastructure: Allotments/Community Gardens</b>
<b>Preferred Option and Alternative Option</b>	
<p><b>Preferred Option:</b> The Council will seek to allocate new sites for allotments/community gardens within areas of demand in West Dunbartonshire. The sites suggested through the Call for Sites will be considered against other areas of land with potential for allotment/community garden uses. The Council will also include a new policy or requirement to ensure that new residential developments, especially Affordable Housing developments, give due consideration to including an area of an allotment/community garden for use by the residents and potentially the wider community.</p> <p><b>Alternative Option:</b> The Local Development Plan will safeguard existing allotments/community gardens within West Dunbartonshire but will not allocate new sites. This is not the preferred option as it would not comply with legislation or Scottish Planning Policy as the Council would not be fulfilling its duty to take reasonable steps to provide allotments after the trigger points in legislation have been reached.</p>	
<b>Responses received from</b>	
<p>Parkhall, North Kilbowie &amp; Central Community Council,  Silverton &amp; Overtoun Community Council,  Persimmon Homes,  Bonhill &amp; Dalmonach Community Council,  G Parton,  Susan Dick,  Swan Real Estate PLC,  Vale of Leven Trust,  SNH,  SEPA,  Clydebelt,  East Dunbartonshire Council</p>	
<b>Summary of responses</b>	
<p>The majority of those who responded supported the preferred option to seek to allocate new sites for allotments/community gardens within areas of demand in West Dunbartonshire and to also include a new policy to ensure that new residential developments, give due consideration to including an area of an allotment/community garden.</p> <p>In addition, the following comments were made:</p> <ul style="list-style-type: none"> <li>• <b>Silverton &amp; Overtoun Community Council</b> request sites at Townend Road and Millburn Crescent are allocated. Each urban area should have its own allotment provision. The Council should support community gardens for people with physical, social, and mental disabilities or deprivation.</li> <li>• <b>Parkhall, North Kilbowie &amp; Central Community Council</b> suggest that if a new community garden is proposed there must be a plan and funding in place for its long term maintenance with a clearly identified line</li> </ul>	

of responsibility. The Council must also take steps to ensure that allotments are not neglected or underused.

- **Persimmon Homes** argue that within new housing developments valuable development land should not be sacrificed for allotments or community gardens. Concern that such allotments can be seen as unsightly and may not be of benefit to the new homeowners. Furthermore the allocation of such areas may become contentious.
- **Bonhill & Dalmonach Community Council** suggest the contaminated land behind the new housing at Bonhill Primary School (old school Football Park) could be decontaminated and made into allotments.
- **Swan Real Estate PLC** ask that the site at the former Distillery Site, Bowling be removed from the list of sites considered for allotments. This site has a planning consent for housing which has partly been implemented therefore still live. This site is now being proposed for Affordable Housing and discussions have taken place with the Council's Planning Service. Contained in the SHIP to commence in 2018.
- **Vale of Leven Trust** state that it is unclear what demand there is in the area of Vale of Leven and a feasibility study may be appropriate to gauge this.
- **SNH** consider that the Council is best placed to offer views on the appropriateness of sites, but in general suggest that these should be located in accessible locations, close to areas of population where there is demand. The former bowling greens at Faifley Bowling Club the location and previous site use might lend itself to community growing or allotment provision.
- **Clydebelt** ask if the site of the old manse glebe at the west side of Faifley Road north of the Cochno Burn could be considered for use as an allotment. It would however need considerable tree removal, root clearance and drainage.
- **East Dunbartonshire Council** are supportive of preferred option, which reflects their own strategy.

### Our response

Individual sites for allotments are still to be assessed but the preferred option remains in line with Scottish Government goals and there is broad support for it in the responses.

The preferred option does not require that community gardens/allotments are created in new developments but that "due consideration" is given to these as part of the required open space provision. Removing the need for "due consideration" for allotments/community gardens to be provided in new developments could weaken the Local Development Plan strategy for open space/greenspace

enhancement.

It is considered Local Development Plan 2 will move ahead with the preferred option.

<b>Miscellaneous</b>	<b>Developer Contributions</b>
<b>Responses received</b>	
NHS Greater Glasgow and Clyde; Network Rail	
<b>Summary of responses</b>	
<p><b>NHS GGC</b> note that there is no information in relation to developer contributions or infrastructure provision as a result of the sites allocated within the proposed development plan.</p> <p>Healthcare bodies need to be involved within the Local Development Plan process to establish the health service needs arising from new site allocations and healthcare issues, At present these are not addressed when detailed planning applications are submitted for major housing developments. The effect of this is that housing developments are not aligned with the NHS investment strategy and that developers are not required to provide contributions towards the development of new local healthcare facilities or to supplement and enhance existing facilities.</p> <p>They are aware of other Health Boards in Scotland who are part of the development plan and development management process and have agreements to receive developer contributions as a result of residential development and are seeking a similar agreement to be part of any developer contribution policy with West Dunbartonshire Council.</p> <p><b>Network Rail:</b> The Main Issues Report through the guidance issued through Clydeplan and in particular the emerging strategies set out in SESplan (which are extremely helpful and provide a new context Clydeplan could follow) set out clear strategic context for seeking developer contributions for required infrastructure enhancements or station improvements as a direct consequence of new development growth. This requirement for and pooling of contributions should be adopted and the lead of East Lothian Council in producing the Proposed Local Development Plan 2016 and Draft Developer Contributions Framework Supplementary Guidance, which sets out a range of pooled contributions which includes a levy on development to fund rail improvements at different rates on development close to the rail network. By considering and introducing the same approach as part of the West Dunbartonshire MIR and LDP it would allow for development which relies on sustainable rail transport to contribution to the funding to improve both services and capacity.</p> <p>The Main Issues Report and Local Development Plan should recognise that by directing growth towards public transport corridors, without the provision of additional capacity or where required, improved facilities, the network will become constrained and will not be able to provide increased service. Accordingly, Network Rail requests that the Main Issues Report is refined to ensure inclusion of the requirement that development must be accountable for resultant requirements to railway infrastructure and facilities. In addition, the Main Issues</p>	

Report should look to follow the Developer Contribution pooling approach, being advocated and endorsed through both Strategic Development Plans and Local Development Plans.

Given the proposed growth strategy of the Main Issues Report is very closely related to the existing rail network with future development linked to in particular to the stations, there will be an increase in demand for rail service. This increased provision may result in the requirement for upgraded rail infrastructure or to upgrade facilities at stations. This may require platform lengthening at some stations.

They state that they should be clearly excluded from having to make developer contributions as a publically owned company.

### **Our response**

The only developer contributions that the Council require are in relations to green infrastructure and parking related issues i.e. where suitable car parking cannot be provided on site a contribution to off-site provisions is required to be made.

No detail has been provided on what the NHS is precisely seeking developer contributions for and further discussions with the NHS and Network Rail on developer contributions will be required in this regard before the Council is in a position to form a final view on the necessity for developer contributions.

It must be reminded that LDP 2 must conform to Clydeplan and not any other strategy set out in the Plans that Network Rail suggest. The Council already in certain circumstances requires developers to provide contributions to public transport provision within the site and this is clearly evidenced in the Proposed Plan (2016) and this approach will be continued within LDP 2 where required

The proposed plan will contain a policy on developer contributions towards green infrastructure and this may, dependent on the impact on viability of development sites, be required to be extended, dependent on the discussions with the NHS and Network Rail. However, any contributions that these organisations are seeking will require to conform to the tests set out in Circular 3/2012

However, the Council is not in favour of developer contributions where there is a likelihood that these would prove to be unsurmountable obstacle to development within West Dunbartonshire, especially on our regeneration sites. Therefore, a balance may need to be struck in terms of the impact on health care; rail provision and the need for development.

<b>Miscellaneous</b>	<b>Transportation Infrastructure</b>
<b>Responses received</b>	
<p>Parkhall, North Kilbowie and Central Community Council, Network Rail, Anonymous (Your Place Your Plan event); Martin Aird (Your Place Your Plan event); Anonymous (Your Place Your Plan event); Gillian Clark(Your Place Your Plan event) ; Gordon Milloy (Your Place Your Plan event)</p>	
<b>Summary of responses</b>	
<p><b>Parkhall, North Kilbowie and Central CC</b> state that the main failing of Local Development Plan 2 and the resultant Main Issues Report is the lack of coherent proposals to ease the acute road transport problems that afflict West Dunbartonshire. It is widely acknowledged that traffic congestion has a high economic cost and is bad for the environment and so, for example, it is surprising that Local Development Plan 2 omits the references to improving traffic flow at Kilbowie Roundabout that were contained in Local Development Plan: proposed Plan (2016) especially when the problems at the roundabout are becoming ever more acute.</p> <p>In our opinion the following should be considered to improve traffic flow:</p> <ul style="list-style-type: none"> <li>• Implement well thought out plans for the A82 relief road without delay.</li> <li>• Improve the roundabout at Barloan and especially the disastrous one at Lomondgate.</li> <li>• In the short term install new traffic light equipment at Kilbowie Roundabout to replace the obsolete apparatus that is no longer fit for purpose.</li> <li>• Until a final solution can be developed for Kilbowie Roundabout four slip roads should be constructed to ease congestion.</li> <li>• The A82 from Dalnottar Interchange to the Glasgow boundary should be returned to trunk road status to enable Transport Scotland to maintain it properly.</li> <li>• The bus lane on the north section of Kilbowie Road should be removed.</li> <li>• Parking on Kilbowie Road between the roundabout and Hawthorn Street should be prohibited at peak periods.</li> <li>• The Connecting Clydebank proposals are misconceived. The A814 is a busy main road and sensible and practical plan for improving traffic flow should have been a part of the Local Plan.</li> </ul> <p><b>Network Rail</b> broadly supports the Main Issues Report on the need for investment in infrastructure to support the City Deal. Their comments endeavour to reinforce the policy framework set out in the Clydeplan and to ensure that it accommodates reasonable foreseeable future demands on both existing and future railway infrastructure in the City Region.</p> <p>They seek continued support for safeguarding and improving the safety and capacity of the existing and future railway network in tandem with new development, and that where improvements are required, to mitigate the</p>	

infrastructure and capacity issues required.

### Level Crossings

The Proposed Plan should provide strategic guidance for Local Development Plan spatial strategies to avoid allocating development required to use level crossings. Local Development Plan site assessments must take cognisance of the impact of development proposals affecting level crossings. Transport assessment and developer contributions policy and supplementary guidance must ensure infrastructure risks are identified and mitigation secured i.e. level crossing upgrades; alternative crossings etc.

### Notification Zones

We would request that the Main Issues Report provides a strategic context for Local Development Plan's to provide a designated notification zone around all operational railway infrastructure within which any development application proposals would be notified to Network Rail.

This strategy would be similar to that associated with the oil and gas pipelines which run through the SDP area.

**Anonymous (Your Place Your Plan event):** Kilbowie Roundabout should be a main issue - bad congestion and traffic lights are not doing a good job. Show it in the Local Development Plan!

**Martin Aird (Your Place Your Plan event):** Insufficient parking -especially in Drumry, Singer Avenue. Lack of bus service to new leisure centre.

**Anonymous (Your Place Your Plan event):** Congestion on A82 will get worse as more development proposed for Balloch. Single track railwayline to Balloch is an issue.

**Gillian Clark (Your Place Your Plan event):** If building new housing are the road networks going to be improved? Empty shops-can rents be reduced to encourage retailers to move in? Employ more traffic wardens, would pay for themselves. Parking on pavements is a problem - people with prams have to walk onto the road.

**Gordon Milloy (Your Place Your Plan event):** Currently there is increased traffic from traffic lights on Glasgow Road to HBR facility on Castlegreen St. With completion of housing currently underway on Castle Street it appears highly likely householders will use this route up to Glasgow Road. Roadside parking on Castlegreen St already restricts traffic flow. With increased vehicle movement I have concern for regular tailbacks and reduced air quality.

### **Our response**

The comments of Parkhall, North Kilbowie and Central Community Council are understood. However, some of these cannot be addressed within Local Development Plan 2 but will be taken forward with the Council's Road Service. The strategy for the Kilbowie Roundabout, as detailed in the Proposed Plan (2016) will be taken forward into Local Development Plan 2.

Any new development which is likely to have an adverse impact in the Trunk and/or Local Road Network will be required to provide mitigation and enhancement measures to alleviate these impacts.

In response to Network Rail, the Council will ensure that Local Development Plan 2 provides continued support safeguarding and improving the safety and capacity of the existing and future railway network within the Plan. However, there are no operational road level crossings within West Dunbartonshire and the need for a policy on level crossings is not required.

The Council will give further consideration to Network Rail's request to provide a notification zone around their rail infrastructure.

In relation to the anonymous comments made during the Main Issues Report consultation events, the strategy for the Kilbowie Roundabout and comments on the impact of development proposals have been addressed above. In terms of the railway line to Balloch, this is an issue for Network Rail.

In relation to the comments regarding parking provision made by Martin Aird, Gillian Clark and Gordon Milloy, these will be forwarded to the Council's Road's Service to take forward. Local Development Plan 2 will provide, however, clear guidance on parking within new developments etc within its design guidance. In terms of the public bus provision to the Leisure Centre, the Council are aware of this issue and are investigating it further with public transport operators. However, this is not an issue that Local Development Plan 2 can address.

The proposed plan for Local Development Plan 2 will therefore take forward the Strategy for the Kilbowie Roundabout and introduce policies to deal with transport appraisals and significant travel generating uses to ensure that new development does not have an adverse impact on the road network within West Dunbartonshire.

The Proposed Plan will also include text to support safeguarding of the rail network and its capacity within Local Development Plan 2. However, there may be practical difficulties especially on the proposals maps, in terms of providing a notification zone for Network Rails infrastructure which could make the proposals map overly complicated and difficult to comprehend.

<b>Miscellaneous</b>	<b>Outdoor Advertising</b>
<b>Responses received</b>	
Communications, Culture & Communities, West Dunbartonshire Council	
<b>Summary of responses</b>	
<p>The revised Local Development Plan should create a more supportive environment for outdoor advertising in West Dunbartonshire. The Council faces considerable financial challenges in the coming year and needs to identify any means possible of raising income in order to protect key frontline services. One new income stream that could be easily sourced is from controlled-approach to outdoor advertising.</p> <p>One example of this would be discreet advertising signs on roundabouts in the local area. Another example would be to explore options for larger roadside billboard advertising sites which could be leased to third-parties. There is a fantastic opportunity for such a billboard at the scrubland beside Milton's BP garage and there was interest from a private company to pay around £10,000 per year. Precedent exists at the A82 billboard site near the West Park Hotel and there are countless examples elsewhere in Scotland. There could be further opportunities at other key points along the A82 and in central Clydebank.</p> <p>In summary, there is an opportunity for the Council to bring in income to support frontline services and with minimal impact on the local area. If the Local Development Plan was more open to such proposals then they could be taken forward in a sensitive manner.</p>	
<b>Our response</b>	
<p>The Proposed Plan (2016) contained a policy on Advertisements and this will be taken forward into Local Development Plan 2. At present, the proposals suggested by the respondent could potentially have health and safety implications of road users and could also set a precedent for other forms of advertising which are not connected to a business or needed for directional or tourism related uses; therefore, resulting in potentially detrimental impacts to the character and amenity of the areas in which they are located and also, as detailed above, have road safety issues.</p> <p>The advertisement policy within the Proposed Plan (2016) will be taken forward within its current format and will not be extended to accommodate the respondents' suggestions.</p>	

## **Appendix 2: Respondents to West Dunbartonshire Local Development Plan Main issues Report consultation**

### **Organisations and Community Groups**

1. Amec Foster Wheeler on behalf of National Grid
2. Bonhill & Dalmonach Community Council
3. Cameron Planning on behalf of Taylor Wimpey
4. Clydebelt
5. Clyde Marine Planning Partnership
6. Dalgleish Associates Limited on behalf of William Thompson & Son (Dumbarton) Ltd
7. Dumbarton Stations Improvement Trust
8. East Dunbartonshire Council
9. Faifley Community Council
10. Glasgow Airport
11. Homes for Scotland
12. Houghton Planning on behalf of Church of Scotland
13. Keppie Planning on behalf of Craigelvan
14. Knowes Housing Association
15. Muir Smith Evans on behalf of Chivas
16. Muir Smith Evans on behalf of LaSalle Investment Management Ltd
17. Loch Lomond and the Trossachs National Park Planning Authority
18. Montagu Evans on behalf of Dumbarton Football Club
19. Montagu Evans on behalf of Legal and General - St James Retail Park
20. Mr Patrick Doherty on behalf of Sandpoint Marina
21. Network Rail
22. NHS Greater Glasgow and Clyde
23. Parkhall, North Kilbowie and Central Community Council
24. Persimmon Homes
25. Peter Brett Associates on behalf of City Deal
26. Peter Brett Associates on behalf of Mahlin Group Ltd
27. Savills on behalf of Clyde Retail Park
28. Savills on behalf of Logan Factoring and Management
29. SCOTPLAN
30. Scottish Water
31. SEPA
32. SNH
33. Scottish Water
34. Silvertoun and Overtoun Community Council
35. SportScotland
36. Stirling Council
37. Strathleven Regeneration CIC/Walker Group
38. Swan Real Estate PLC
39. Systra on behalf of Transport Scotland
40. Theatres Trust

41. The Coal Authority
42. Vale Of Leven Trust
43. Visitscotland
44. West Dunbartonshire Council
45. Zander Planning on behalf of Henry Boot

Individuals

1. Mr Jeremy Watson
2. Ms Susan Dick
3. Ms Susan Jameson
4. Mr Graham Parton
5. Ms Susan Cuthbert
6. Mr Martin Aird
7. Ms Claire McDonald
8. Mr Alan Speirs
9. Ms Lesley McEwan
10. Ms Alice Fletcher
11. Mr John Mullen
12. Mrs MacKay
13. Ms Claire Marshall,
14. Mr Stuart Macdonald,
15. Ms Claire MacDonald,
16. Mr Pierre de Fence
17. Ms Jessie Turner on behalf of Mr Hugh Kinloch
18. Ms Gillian Clark
19. Mr Gordon Milloy
20. Mr Harry Borthwick
21. Mr John Mullen
22. Ms Karen King