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By email:  
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Our ref: A38920293  
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Dear Alan,

**West Dunbartonshire Council - Draft Supplementary Guidance on Creating Places and Green Network and Green Infrastructure**

I refer to your correspondence dated 12<sup>th</sup> May, 2022, inviting comments on the above documents. Please see below comments from the Scottish Government:-

**Draft Supplementary Guidance - Creating Places**

At page 21 – Habitat Enhancement: Second paragraph, delete “The site” at start of sentence.

**Draft Supplementary Guidance - Green Network and Green Infrastructure**

General comment	Scottish Planning Policy (SPP) states at paragraph 232: “In the design of green infrastructure, consideration should be given to the qualities of successful places.” We suggest the SG should make reference to those qualities, which are set out in paragraphs 41-46 of SPP.
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General comment	<p>In part 4, it is stated that contributions for green infrastructure will be sought in line with the circumstances set out in Policy GI4 of the LDP, and lists those four circumstances.</p> <p>Two of those circumstances are:</p> <ul style="list-style-type: none"> <li>• Where a development site is accessible to open spaces but those spaces are of a poor quality; and</li> <li>• Where development sites are accessible to good quality open spaces but a contribution to the green network is required to enhance its provision to the Central Scotland Green Network.</li> </ul> <p>It is not clear in the draft SG (particularly the flowchart in Appendix 1) whether developer contributions under Policy GI4 will/may be required in the above two circumstances even if the development includes sufficient open space (meeting the relevant quality and quantity standard) within the development site. The flowchart in Appendix 1 implies that such contributions would be required in such instances, but Example 1 in Appendix 3 does not. This should be clarified.</p>
Page 10, 'Accessibility standard'	<p>It is stated that the accessibility standard is: "Everyone will live within a 250m walk of a 0.2 ha usable and good quality greenspace." If 'good quality' is intended to mean that the space meets the 'quality standard' i.e. meets or exceeds the threshold score set out in Table 2, this should be made clear.</p>
Pages 10-11, 'Quality standard'	<p>The draft SG on pages 10-11 refers to a 'Quality standard', and states that the quality of an open space is an assessment-derived score based on work undertaken as part of the Open Space Audit carried out in 2016 and updated in 2018 to reflect changes to some spaces.</p> <p>It is stated that "The quality standard is: All publicly usable open spaces should meet or exceed the threshold score set out in Table 2". Table 2 includes different "Quality standard threshold scores" expressed as a percentage for different types of open spaces.</p> <p>However, it is not clear in the draft SG how to identify/calculate the score of existing or proposed open spaces, to determine whether they meet or exceed the threshold score set out in Table 2. This should be made clear.</p>
Page 11 'Quantity standard'	<p>There is a formatting error on page 11 below the heading 'Quantity standard' – it is assumed that the text in the box should be below the text in the first paragraph.</p>
Page 11 'Quantity standard'	<p>It is stated that "Development sites should provide this quantity of open space [30 m<sup>2</sup> per person] as a minimum where the accessibility standard identifies a need based on an analysis of open space provision for the wider area".</p> <p>However this implies that the open space is always required to be provided within the development site, which seems to contradict the text in the box, which refers to "access to" the open space. It also seems to contradict the text under the heading 'Accessibility</p>

	<p>standard' which states that the site appraisal/ assessment will inform what type of space, if any is required within the development or if a financial contribution to an existing space is more appropriate.</p> <p>These apparent contradictions should be addressed.</p>
Appendix 3: Developer contributions examples	It would be useful to expand/revise the examples to show exactly how they follow the process shown in the flowchart in Appendix 1 (e.g. the application of the questions regarding the accessibility and quality standards).
Appendix 3: Developer contributions examples – Example 1	It would be useful to expand the first example to show how the 'site appraisal' method would be used to determine the form of open space required to be provided.
Appendix 3: Developer contributions examples – Example 3	The example refers to a financial contribution to upgrade play equipment in a park less than 400m walking distance. It is not clear whether/how this is considered acceptable in relation to the 'accessibility standard' which refers to a 250m walking distance. This should be clarified.
Appendix 3: Developer contributions examples – Example 6, and explanation of Quality standard on pages 10-11	<p>The example states that “the first step is to see if it meets the accessibility standard i.e. is it within 250m of a 0.2ha amenity greenspace, play space <u>or</u> natural/semi-natural greenspace?” (emphasis added).</p> <p>The example then refers to a “park” within 250m of the site. It states that “the play area is below the 50% threshold and requires investment”. However, the specified 'Quality standard threshold score' for 'Parks and gardens' in Table 2 is 69%. It is not clear whether/why there has to be a play space scoring over 50% within 250m of the development site, if the park scores at least 69%. This should be made clear. Adding an explanation as to how the scoring system works may help the reader to understand this.</p>

There is no mention of historic environment assets so suggest adding the following:

On page 19, 'Appendix 2: Green infrastructure checklist' consideration should be given to an additional check box that states *“identifies historic environment assets and recognises their significance in the site design”*, within the 'Site Analysis' flowchart blue box, under the 'Site Appraisal' section. This would ensure the consideration of gardens and designed landscapes, scheduled monuments and The Antonine Wall (FRE) World Heritage Site and recognise their contribution to green infrastructure.

Yours sincerely

**Allen Hughes**  
**Planning & Architecture Division**