

Green and Blue Infrastructure Guidance Comment Analysis

Comment Summary	Received From	PKC Officer response	Change to be made to Guidance
Relevant Section of Guidance			
1. General Comments			
Confirmed support for the provision of a spatial strategy which is better focussed on settlement scale opportunities, and expansion and enhancement of the green/blue network. SNH also supports the clearer language and structure of this revised guidance.	SNH	The supporting comments are noted.	No change proposed by the Council.
HES welcomes the improvements made in terms of the online spatial tool as well as the specific opportunities identified at the settlement and strategic scales. The recognition of the contribution made by gardens and designed landscapes is appreciated.	HES	The supporting comments are noted.	No change proposed by the Council.
It would be beneficial if the document referenced other guidance on the design and implementation of active travel infrastructure to ensure best practice.	TACTRAN	The Council does not have their own best practice guidance on the implementation of active travel infrastructure. From the list of guidance recommended by TACTRAN, Transport Scotland's Cycling by Design has been referred to as an advisory document in the past however this will soon be reviewed. The updated guidance is expected to provide a better baseline for designing for active travel and once completed can be referred to in planning guidance.	No change proposed by the Council.
The guidance should emphasise the importance of native woodlands and flag up the key importance of conserving	Member of the public	Woodlands are an essential component of GI and form part of the guidance, including the online map and data analysis (See Appendix 1 of the guidance).	No change proposed by the Council.

<p>natural habitats to help avert the Climate Emergency. Developments both adjacent & within native woodlands are incompatible with maintaining habitat integrity and should not be permitted.</p>		<p>The guidance states that “all development should avoid fragmentation or loss of existing green/blue resources and look to enhance these” and encourages “connecting fragmented woodland through new planting or regeneration”. It cannot be stated however that development adjacent to or within native woodland will be refused planning permission. In order to determine proposals which may have an impact on woodlands, the Council follows the Scottish Government’s policy on control of woodland removal .</p>	
2. Introduction			
<p>Additional key linkages of health and wellbeing and climate change adaptation could be added to the spider diagram.</p>	SEPA	<p>The diagram was prepared to illustrate the relationship between this guidance and other Local Development Plan policies. Climate change mitigation and well-being are overarching aims that the individual policies contribute to – this could be reflected better in the vision statement.</p> <p>Section 4 also states that: “Green/Blue infrastructure allows the essential <u>benefits of nature to be provided to people</u>. These essential benefits are known as ecosystems services and include the provision of food, clean air and water, regulating the effects of <u>climate change</u>, and cultural benefits such as <u>providing opportunities for recreation and exercise</u>.”</p>	<p>Amend description under the spider diagram to read as:</p> <p>Proposals should take into account other Local Development Plan policies and guidance relevant to the delivery of green infrastructure.</p> <p>Amend the vision statement to read as:</p> <p>Green infrastructure across Perth and Kinross will be high quality and multifunctional, allowing the free and easy movement of people and wildlife. It will deliver a wide range of ecosystem services, contributing to climate change adaptation and mitigation as well as well-being.</p>
<p>The SG could highlight that linkages to Local Place Plans (LPPs) should be considered in developing green</p>	SEPA	<p>The diagram under the ‘How to use this guidance’ section highlights that community input should inform proposals throughout their development.</p>	<p>No change proposed by the Council.</p>

infrastructure and opportunities for incorporation of LPP objectives maximised.		This will also ensure that any green infrastructure opportunities already identified within existing community plans are considered. Once secondary legislation regarding LPPs is passed, their place within the planning process will be clarified and they can be referred to in planning guidance.	
The last sentence of the first paragraph is presumptive: “guidance to help direct actions that enhance our natural resources.” Development often denigrates natural resources.	Member of the public	The full sentence reads as: “Community groups and Council services are also encouraged to use the guidance to help direct actions that enhance our natural resources.” The purpose of the guidance is to encourage best practice and help ensure that GI is considered in development proposals and other projects.	No change proposed by the Council.
3. The Vision			
The vision could be expanded to highlight the contribution to social cohesion/health and wellbeing and educational aspects.	SEPA	The Council agrees that delivering green and blue infrastructure contributes to a number of social and environmental objectives. The definition of GI (Section 4) already refers to education, habitat creation and health as benefits delivered through GI. The vision statement can be amended to specifically mention well-being as a key aim of the guidance.	Amend the vision statement to read as: Green infrastructure across Perth and Kinross will be high quality and multifunctional, allowing the free and easy movement of people and wildlife. It will deliver a wide range of ecosystem services and contribute to climate change adaptation and mitigation and well-being.
The aim of the strategy should be to create a nature-rich city with benefits for all citizens.	Member of the public		
The vision is presumptive; development arising from both local development plans will reduce the movement of people and wildlife.	Member of the public	The vision statement is a declaration of the objective the Council aims to achieve by preparing and implementing this guidance. The guidance encourages best practice and helps ensure that GI is considered in development proposals.	No change proposed by the Council.
Temporary green infrastructure cannot be considered a mitigation measure.	Member of the public	Temporary use is mentioned within Policy 40 that is quoted in the guidance under Section 2. The policy does not suggest that temporary greening is a mitigation measure. It is simply good practice that the Council encourages.	No change proposed by the Council.

4. How to use this Guidance			
Support the flow chart which considers green infrastructure as part of a development's early concept plan.	SNH	The supporting comments are noted.	No change proposed by the Council.
<p>With regards box 1, it would be useful for landscape architects to have hydrology of site information available to overlay when looking at blue-green linkages in order that they can design in this context.</p> <p>In box 2, Blue/Green infrastructure should complement access and active travel routes across the site and not just primary access routes. It should be integrated from streetscape up for example bioretention features fed by dropped kerb for individual housing plots.</p>	SEPA	The Council agrees with SEPA's comments, the diagram can be amended to provide clearer advice.	<p>Amend the text in the diagram to read as:</p> <p>"As part of the site appraisal, identify existing green and blue infrastructure to protect and enhance. Use the online map alongside relevant surveys and records (e.g. on biodiversity, hydrology) and community and stakeholder input."</p> <p>"Make green and blue infrastructure part of your early design work and concept plan, similar to road layouts or access points."</p> <p>"Develop a proposal and design statement which demonstrates how the development will enhance green and blue infrastructure at different scales."</p>
Make it clear that the design of proposals should also be informed by a 'site appraisal', 'design and development' work, and, where relevant, a 'masterplan' in order to identify opportunities for new infrastructure.	RP Planning	The table on page 4 outlines the process from site appraisal stage to developing proposals with GI in mind. Masterplanning is also referenced throughout the document.	<p>Amend the text in the diagram to read as:</p> <p>"Make green and blue infrastructure part of your early design work and concept plan..."</p>
It is difficult to see how larger developments in both local development plans can achieve the following: "Develop a proposal and design statement which demonstrates how the	Member of the public	The guidance requires developers to analyse the site context with regards to green and blue linkages and develop a proposal that allows for the protection and enhancement of these assets. The design statement is a tool to explain the applicant's train of	No change proposed by the Council.

development will enhance green and blue infrastructure.”		thought, show different options that have been tested throughout the process and highlight measures which contribute to GI (e.g. additional planting)	
5. What is Green and Blue Infrastructure?			
The section clearly defines green and blue Infrastructure and principles. Recommends adding biodiversity as a function and having greater emphasis throughout the guidance on the value of using native species where appropriate.	SNH	The Council agrees that promoting biodiversity should be mentioned and proposes to expand neighbourhood level opportunities in relation to this. The use of native species is promoted both by Policy 40: Forestry, Woodland and Trees as well as the new Supplementary Guidance on Open Space which provides detailed advice on landscaping and design. Site specific developer requirements also call for native plating where considered appropriate.	Add `promoting biodiversity` to the list of ecosystem services. Under neighbourhood level opportunities in Section 5, amend the text to read as: “Green/blue infrastructure should be designed and planned to support and increase biodiversity by considering proximity to natural habitats, habitat heterogeneity, presence and requirements of native species, patch size and management practices.”
Mention the marketability benefits to developers of well-planned green infrastructure.	SNH	The Council agrees that GI can contribute to increasing the quality of life and benefit people in made different ways. The list of ecosystem services already highlights active travel, recreation, health and education but this can be expanded further.	Add `cultural value and sense of place` to the list of ecosystem services.
Benefit in terms of economic uplift associated with enhanced “sense of place” could be added to the definition of Multifunctionality and opportunities for better social inclusion across the site could be included in Connectivity.	SEPA	Paths, woodlands and watercourses are considered green and blue infrastructure and have been identified on the online map. Road verges are not captured by data but where they have beneficial features, can be considered GI. The definition	Under Multifunctionality, include the following text: Well planned green and blue infrastructure also contributes to creating character and a sense of place, increasing the value of developments.
Ecosystem services should include noise abatement and cultural services provided by GI should also be acknowledged. The	Member of the public		Under Connectivity, include the following text:

definition of green & blue infrastructure should include verges of roads, paths and watercourses where these have natural vegetation such as wildflower grassland or shrubs. Woodland should be defined not just by the presence of trees but also shrub layer and ground flora of woodland plants.		includes examples of 'green features', it is not a definitive list.	Connecting green and blue features facilitates the movement of wildlife and by incorporating paths, it also provides opportunities for active travel and better social inclusion across the area.
Definitions should be consistent with the ones given in the Glossary of LDP2 (e.g. Green Infrastructure). For example, the LDP includes 'quality of life' within its definition which could include sports facilities.	RP Planning	In terms of sport facilities, parks and open spaces, including playing fields are included in the data analysis. The Open Space SG includes more information on how these areas can be designed to provide biodiversity and landscape benefits. Tennis courts and bowling greens are also part of the Greenspace Open map and the Council hasn't excluded anything from this data as a base layer https://www.ordnancesurvey.co.uk/documents/os-open-greenspace-product-guide.pdf	
The following sentence is misleading. "Green/Blue infrastructure allows the essential benefits of nature to be provided to people."	Member of the public		
Note in the guidance that whilst they may not constitute green infrastructure; sport areas such as tennis courts and bowling greens are important in terms of planning for sport; health and recreation.	Sport-scotland		
6. Delivery of Green and Blue Infrastructure at Different Scales			
The draft SG must not require applicants to improve the network beyond the development site. Policy 42 (Green Infrastructure) only refers to the green infrastructure "within and linked to the site", but the draft SG appears to go further and suggests that improvements could be sought from a wider area.	RP Planning	Developers will not be required to provide landscaping outside of the site boundary. However, submissions should show an understanding of the wider context and how GI within the site can link to the existing network outwith the red-line boundary. Some sections could be reworded to avoid misunderstanding.	Amend the text under Neighbourhood level opportunities to read as: "Developments should create networks that link to green infrastructure beyond the site boundary".

			<p>Amend the text in the opening paragraph of Section 5 to read as:</p> <p>“Thought must be given as to how existing resources will be protected and new green/blue infrastructure will connect to other habitats and green/blue features beyond the ‘red line’ boundary of the development site.”</p>
Generally, supports this section however the cycle path on the Bertha Park drawing is too narrow to act as a multifunctional route and doesn’t illustrate good practice	SNH	The illustration was included as it represents well the relationship between the green, blue and access elements of Green Infrastructure. The drawing is only conceptual and it would be ensured at the detailed design stage that the path is suitable for multiple users.	<p>Caption to be modified as follows:</p> <p>“Conceptual drawing of Bertha Park pond and cycle path on the edge of housing development”</p>
Support the encouragement of the daylighting of culverts; reference could be made to PKC’s Flood Risk guidance with regards this issue and proposed river crossings, along with reference to the CAR Practical Guide to ensure readers are aware of the authorisation requirements of river crossings.	SEPA	References will be added to the guidance.	Add the following text to page 8: “See the Council’s Flood Risk Guidance and the CAR Practical Guide for detailed advice on culverts and river crossings.”
Road and path verges should be more imaginatively designed to provide habitat by using nutrient-poor soil and seeding with perennial mixtures of Scottish grasses and wildflowers that can withstand occasional (or even frequent) mowing.	Member of the public	Page 8 of the guidance (‘Streets’) encourages creating multifunctional verges which help absorb runoff and add green value. The Open Space guidance goes into more detail about landscape design and promotes low maintenance solutions which are beneficial for biodiversity. It is not considered necessary to add more detail to the GI guidance.	No change proposed by the Council.

<p>Development over a certain size should be required to provide a traffic free link to the nearest point on the national cycle network, or at least have a safe cycling and walking route to the nearest schools and shops. Planning officers should investigate whether informal walking routes exist as part of their assessment of planning applications and ensure that the developer provides footpaths to preserve these routes.</p>	<p>Member of the public</p>	<p>The Council agreed with the need to connect to existing cycle infrastructure, walking routes and utilise existing desire lines within development sites. There are however other policies and guidance that provide detailed advice on active travel and masterplanning.</p> <p>Policy 60 in the Local Development Plan states that: “New developments should provide access from the development to off-road walking and cycling provision as part of the green network, and contribute to its enhancement and improved connectivity. Existing active travel routes will be safeguarded and incorporated into development. Cycle parking facilities should be provided.”</p> <p>The Council’s Placemaking Guidance highlights the need to identify and where possible follow informal walking routes and `desire lines` under the `Accessibility & Permeability` chapter. Applicants are required to consider routes across the site that people are most likely to take, providing direct access and minimising detours.</p> <p>Furthermore, Transport Scotland’s Cycling by Design has been adopted as an advisory document however this will soon be reviewed. The updated guidance is expected to provide a better baseline for designing for active travel and once completed can be referred in this supplementary guidance.</p>	<p>No change proposed by the Council.</p>
<p>In relation to the opening paragraph of section 5.1; the guidance should demonstrate where “adverse effects” on</p>	<p>Member of the public</p>	<p>It depends on the context of the site and the proposal itself what would constitutes as an unacceptable adverse effect. The guidance and the</p>	<p>No change proposed by the Council.</p>

existing green and blue infrastructure will be unacceptable and lead to refusal of planning applications.		policy presume against the removal GI and fragmentation of wildlife habitats, and this is taken into account at the determination of planning applications.	
There is little evidence that “Strategic developments provide opportunity to deliver large scale green/blue infrastructure.	Member of the public	Strategic developments, where designed with green and blue infrastructure principles in mind can deliver new GI that links to the existing network. The website below includes some example case studies developed by CSGN: https://www.gcvgreennetwork.gov.uk/what-we-do/delivering-green-infrastructure	No change proposed by the Council.
7. Perth an Kinross Green & Blue Infrastructure Strategy			
The Council should undertake effective monitoring and assessment of the success of delivery of green infrastructure for specific developments.	SNH	The comment is noted and welcome.	No change proposed by the Council.
Under `the output` section, recommends inserting wording stating that the opportunities table should be read in conjunction with the online map.	SNH	This is already stated on page 13.	No change proposed by the Council.
State that the map may not be 100% accurate but that where elements of green or blue infrastructure are not included on the map; if they clearly meet the relevant criteria; then they should be appropriately protected and considered in the design process.	Sport-scotland	The Council used the most accurate, available open data for this guidance (i.e. OS Greenspace map supplemented with local data where available. Ordnance Survey is committed to maintaining its products to the highest levels of accuracy and currency. The initial capture of data for Open Greenspace was completed using existing topographic databases and aerial imagery however OS cannot guarantee that all relevant sites will be included in the data.	Add the following text to Appendix 1 and to the online map: The Council has used the most accurate, available open data for this Guidance (i.e. OS Greenspace map supplemented with local open data – see table) Ordnance Survey is committed to maintaining its products to the highest levels of accuracy and currency. OS has processes in place to allow expert users to feed back on the

		OS has processes in place to allow expert users to feed back on the product and allow us to act on potential omissions and improvements to content, subject to accuracy checks. https://www.ordnancesurvey.co.uk/documents/os-open-greenspace-product-guide.pdf . It is crucial that designers and developers consult all available sources for information, including site surveys and stakeholder engagement.	product and allow OS to act on potential omissions and improvements to content, subject to accuracy checks. Data displayed on the online map should always be validated through detailed site assessments. Features which are not identified on the map but could be classified as green/blue infrastructure should be protected and considered in the design process.
Net gain should be a requirement for development - not just limiting impacts on green & blue infrastructure but creating more than was there before.	Member of the public	The guidance encourages enhancement of wildlife through the provision of green and blue infrastructure in accordance with Policy 41 of the LDP which seeks to protect and enhance wildlife and habitats but does not require a net gain.	No change proposed by the Council.
This guidance needs to identify how green/blue infrastructure to be provided will be maintained, such as providing a management plan with the planning application and identifying committed financial resources.	Member of the public	Applicants are required to have an agreement in place for the management of landscaped areas within their site. The Open Space Guidance outlines the options developers have for the long-term maintenance of open spaces. It is not considered necessary to reiterate it in this guidance.	No change proposed by the Council.
8. Opportunities Table			
Welcomes the strategic green network link shown from Perth to Dundee, which forms part of TAYplan's strategic green network.	SNH	The supporting comments are noted.	No change proposed by the Council.
The table and the online map should identify further potential strategic linkages as well as additional active travel routes (e.g. segregated cycle ways) within and beyond the Council area.	SNH	The revision had a limited scope and the Council decided to focus on data analysis and internal consultation as a means of information gathering. However, the value of cross-boundary thinking and engagement is acknowledged.	Add the following commitments to the moving forward section: <ul style="list-style-type: none"> • cross-boundary working • including further active travel routes

		The development of a dataset with existing cycle routes is underway; when this is finalised, it could be added to the online map and help identify gaps in the existing network.	
We support opportunities identified for “alongside the Lade” (pg.15) and the statement “provide appropriate connections with the existing Lade and River Almond routes” (pg. 16). However we suggest this is strengthened, and enhancement of the Lade greenspace and access is identified as a key green and blue route opportunity.	SNH	The Lade is identified as an existing resource, as well as an opportunity for further improvement on the online map. The integrity of the corridor is protected by LDP policy and the Council is currently preparing a Management Plan which will outline improvements to the Lade.	No change proposed by the Council.
The SG does not state any specific requirement for development in or near an opportunity area to support (either through contributions or direct intervention) one of the opportunities identified. It would make the Guidance more effective if it stated requirements of development rather than an aspirational wish list.	TACTRAN	LDP2 was already at Examination stage when the revision of this guidance was undertaken. Therefore, additional opportunities that have been identified through data analysis and engagement could not inform the developer requirements in LDP2. Nevertheless, as the supplementary guidance is statutory and will form part of the LDP following approval by Scottish Ministers, developers will be required to consider these additional opportunities when preparing development proposals and submitting planning applications. It should also be noted that opportunities will not all be delivered through new development, there are other mechanisms for achieving these connections (see page 12).	No change proposed by the Council.
The requirements (including the maps within the online document) should be consistent with the LDP2 ‘Site Specific Developer Requirements’ for development sites.	RP Planning		
There are some opportunities which are not included as developer contributions for specific allocations in the LDP. For example under ‘Perth core villages,’ the opportunity to link Bridge of Earn and Abernethy is not included. SNH refers to	SNH	Developers will have to demonstrate that they considered the opportunities within and around the site and developed a proposal which maximises the potential benefits of GI to people and wildlife. The	

their comments on the Council's 'Developer Contributions and Affordable Housing draft SG' as a way of delivering some of these key links.		planning application stage will provide an opportunity to determine the ideal form of GI delivery in light of the analysis provided in this guidance and the detailed site work and studies undertaken by the developer.	
Objects to any change within the draft Supplementary Guidance document which alters the agreed position on Almond Valley.	Pilkington Trust	The representation does not provide any examples where the draft SG would be conflicting with the approved planning consent.	No change proposed by the Council.
Throughout the response, comments have been made on the acceptability and impact of developments such as Bertha Park, the Cross Tay Link Road. The respondent stated that the mitigation measures proposed for these developments are not adequate. North Inch is not a multifunctional open space area. Alongside the SuDS pond in Luncarty, they have poor management which limits benefits for wildlife.	Member of the public	The comments on the individual developments are noted and welcome. The Council agrees that in order to maximise the benefits of green infrastructure over time, good design and effective maintenance is crucial. As noted above, the new Open Space Guidance provides detailed advice on the design and maintenance of open spaces and promotes landscaping solutions that support biodiversity and does not require regular maintenance. The comments have also been forwarded to the Council's Greenspace team who is responsible for the planning and implementation of maintenance on Council owned public opens spaces.	No change proposed by the Council.
9. Online Map			
SNH welcomes this locationally specific online map using an O.S. base and suggests a few improvements to aid developers on how to best use this.	SNH	Comment is noted and welcomed. The online map should be viewed alongside the Guidance. Section 3 outlines how the guidance should be used and the case study under Section 6 shows how different elements of the guidance can inform developers. The online map contains information widget to direct users on how to navigate and use the map. Additional suggestions to this text are welcome.	Include the following text in the guidance: The Online Green/Blue infrastructure map is intended to be a dynamic map product. Newly available data will be reviewed regularly and added where deemed appropriate to Green/Blue infrastructure planning and as resources permit.

<p>The status of the “Green and Blue Infrastructure Map” and the method used for generating it is not specified and should be made clear. Will the map form part of the statutory SG? It’s also unclear whether it is a dynamic document and whether the maps within it are part of this consultation.</p>	<p>RP Planning</p>	<p>The online map is a key part of the statutory SG and is referred to throughout the document.</p> <p>The method of generating the map is outlined in Appendix 1 of the guidance.</p>	
<p>10. Moving Forward</p>			
<p>Support the addition of ‘Perth City Cycle network project routes’ in particular, and the need for an Open Space Audit and Strategy. Recommends excluding ‘woodland cemeteries’ and including Local Nature Conservation Sites.</p>	<p>SNH</p>	<p>Woodland cemeteries are going to be new burial areas, where trees will be planted instead of/alongside traditional graves. As such, they will form new green infrastructure and deliver benefits similar to other new woodlands.</p> <p>The Council does not currently have any Local Nature Conservation Sites. Surveys are due to start in 2020 to establish geodiversity and biodiversity sites and once these are established, the Council can review their role in terms of Green and Blue infrastructure and consider their inclusion in this guidance.</p>	<p>Include the following text in the guidance:</p> <p>The Online Green/Blue infrastructure map is intended to be a dynamic map product. Newly available data will be reviewed regularly and added where deemed appropriate to Green/Blue infrastructure planning and as resources permit.</p>
<p>11. Appendix</p>			
<p>There is an omission at a strategic scale of paths and segregated cycle routes. There is reference to this under ‘settlement scale potential green-space linkages’ in the table but this seems to be incomplete and it is not clear what data has been used.</p>	<p>SNH</p>	<p>Appendix 1 outlines path and cycle data used in existing (adopted paths, long distance routes) and potential linkages (Future Potential Routes/ Indicative Cycle Path (e.g. Perth to Dundee)</p> <p>PKC intends to update the map with active travel plan cycle routes as they become available</p> <p>Existing and proposed Greenspace linkages (including paths and cycle ways have a scale</p>	<p>No change proposed by the Council.</p>

		threshold applied due to the detailed nature of the dataset. It is possible to zoom in to display these layers at a strategic scale	
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