

APPENDIX A

Report detailing consultee responses and suggested amendments

Falkirk Greenspace: A strategy for our green network Consultative Draft

RESPONDENT: Roads Development Co-ordinator, Development Control & Flooding, Falkirk Council	
Comment Received	Proposed Council Response
<p>The document appears to cover the relevant issues and provides an overview. Site specific issues would require to be considered as and when they arise.</p> <p>Schemes to alleviate flooding may utilise green space as temporary storage and the installation and management of measures would be discussed with all relevant parties. Conversely, proposals for access and greenspace would also require to consider implications for flood alleviation.</p>	<p>Noted.</p> <p>Future reviews of Falkirk Greenspace Strategy should be informed by the forthcoming Flood Risk Management Plan.</p>

RESPONDENT: Policy Officer, Education Services, Falkirk Council	
Comment Received	Proposed Council Response
<p>In paragraph 3, could you please insert “and play facilities” in the final sentence, so it reads “This includes the potential for on-site improvements to school grounds and play facilities and existing or upgraded off-site enhancements ...”</p> <p>Under “Vision” at the top of the second column, can you please add “safe” after “high quality”.</p>	<p>Agreed. Text amended as follows:</p> <p><i>“This includes the potential for onsite improvements to school grounds and play facilities, and existing or upgraded off-site enhancements to.... “</i></p> <p>Agreed. Amend “Vision” text as follows: <i>“Young people across Falkirk Council have access to high quality, safe greenspace.....”</i></p>

RESPONDENT: Maida Ballarini, Development Officer (East), Central Scotland Conservancy, Forestry Commission Scotland	
Comment Received	Proposed Council Response
<p>The document reads very well, it is concise but comprehensive and makes use of clear and simple graphics. A very good document that takes stock of all the initiatives that Falkirk Council has taken forward with partners over a period of time, as well as spelling out a clear and ambitious vision, linked with the economic growth of Falkirk. We look forward to continue to work with yourself, your colleagues and the other partners to continue to deliver quality green network initiatives in the heart of the Green Network.</p>	<p>Noted.</p>
<p>We support the vision and aims as spelled out in the document. In particular we support the wide range of opportunities highlighted under the Priority Actions.</p>	<p>Noted.</p>

We welcome the emphasis placed on partnership working as a successful way to deliver woodland creation and management. We welcome the reference to the Woodlands in and Around Towns (WIAT) programme and the Central Scotland Forest Strategy, as well as the site specific projects that the Council has developed/ supported/ instigated over the years.	Noted.
<p>We would however like to propose an addition to the section '5.6 Woodland: Planting, protecting and managing woodlands':</p> <p>We would recommend the inclusion of a reference to the Scottish Government Policy on Control of Woodland Removal in this section to highlight the guiding principle that there is a strong presumption in favour of protecting Scotland's woodland resources</p>	<p>Agreed. Add text to beginning of paragraph 3:</p> <p><i>"Scottish Government Policy on Control of Woodland Removal highlights the guiding principle that there is a strong presumption in favour of protecting Scotland's woodland resources."</i></p>

RESPONDENT: Angela Burke, SEPA	
Comment Received	Proposed Council Response
We are pleased note that our comments on the draft strategy have been taken on board. We therefore support the provisions of the strategy and are satisfied that the associated multiple benefits that the green network can deliver will assist the implementation of the river basin management plan and sustainable flood risk management.	Noted.
<p>We have the following brief comments to make in relation to Section 5.7:</p> <p>Paragraph 4 - the Forth Estuary South Coastal Catchment is also located with the Falkirk Council area.</p>	<p>Agreed. Amend text as follows:</p> <p><i>"Within the Falkirk Council area, the water environment comprises the Forth Estuary South Coastal Catchment, along with the catchments of the River Avon and the River Carron."</i></p>
Paragraph 5 - the introduction to this paragraph could be improved by including the background to the Forth Multiple Benefits Project e.g. As part of the effort to align the CSGN and RBMP objectives the Forth Multiple Benefits Project is being delivered etc.	<p>Agreed. Amend text as follows:</p> <p><i>"As part of the effort to align the CSGN and River Basin Management Plan objectives the Forth Multiple Benefits Project is being delivered by...."</i></p>
It would also be helpful if the identified sites were included on the map on the next page.	Agreed. Amend map to include sites: Castlecary Low Wood, Bonnyfield Local Nature Reserve, Tamfourhill/Portdownie and Pow Burn.
Objectives - this should be amended to state "maintain and improve <u>the ecological quality of the water environment</u> within the Falkirk area". This terminology aligns with the Water Framework Directive and covers all aspects of the water environment including water quality, habitat, morphological and flow characteristics.	<p>Agreed. Amend text as follows:</p> <p><i>"To maintain and improve the ecological quality of the water environment within the Falkirk area".</i></p>

RESPONDENT: Isla Campbell, SNH	
Comment Received	Proposed amendment / Council response
We welcome the importance the Council is putting on the development of multi-functional greenspace and commend you for producing a document which focuses specifically on greenspace and builds on the good work that has already been done in the area. The document makes good links to the Central Scotland Green Network (CSGN) and recognises that green networks are a multi-functional network of interconnected components and corridors.	Noted.
It is slightly unclear how the document links into the LDP and in particular the 'Spatial Strategy' and 'SG13: Openspace & New Developments'. The LDP makes no reference to the Greenspace Strategy which is disappointing considering the strategy could complement the aims of the LDP and help deliver the greenspace elements of the vision and objectives.	<p>Disagree. No change required.</p> <p>The Local Development Plan (LDP) process and drafting pre-dated the Greenspace Strategy production. The Greenspace Strategy does reference the LDP, complements its aims and helps deliver some thematic and spatial elements of its vision and objectives.</p> <p>Any revision of the LDP, as suggested by the comment, is therefore a matter for the LDP and would require to be made as a representation at the appropriate time and as part of any future revision of the LDP document.</p> <p>SG13 is a clear policy on Open Space & New Developments as part of the statutory Development Plan. The Greenspace Strategy is a non-statutory document.</p>
There are a number of actions planned throughout the document, however it is unclear what the timescales are for the actions and whether some are just aspirations.	<p>Noted. No change required.</p> <p>This is a 5 year strategy projecting the intended direction of travel in greenspace delivery in the Falkirk Council area over this period.</p> <p>This is an overarching strategy, not just for Falkirk Council, but to direct a range of greenspace partnership action. It is therefore felt, for document brevity, that any additional level of detail would be more appropriate for retention in the annual work plans of individual partners and partnership annual work plans (e.g. CSFT Falkirk Annual Work Programme).</p>
We welcome that you have identified 9 key priority areas and that you have set a vision, objectives, and actions for each of the 9 priorities. It would have been good if you could have linked these 9 priority areas back to the LDP and referred to this strategy within the Spatial Strategy.	<p>Agreed. CSFT has also made this comment and has suggested additional text which will assist in addressing this point:</p> <p><i>"The implementation of spatial policy within the LDP will provide the opportunity for green network delivery that is functional and sustainable and is characterised by the elements set out in section 1.5."</i></p>

<p>In section 5.3 (Outdoor Access) when referring to the 'path network' it appears the main focus is on walking. It appears cycling has been somewhat forgotten about, despite being mentioned briefly in a couple of the actions at the end of the section. An "accessible green network" should include walking and cycling routes.</p> <p>Within Falkirk you have a number of good cycle paths including NCR76, canal towpaths and Callander Estate cycle trails, yet you have no mention of them, nor encouraging people to use them.</p>	<p>Disagree. No change required.</p> <p>Section 5.3 refers to 'path networks' which, in accordance with the Land Reform (Scotland) Act 2003, are available for use by cyclists and horse riders as well as walkers.</p> <p>Emphasis is given within priority actions to encouraging use and promotion of the extensive path network:</p> <p>Management and Maintenance Action: "To encourage more path use, we shall make sure the network is safer and more welcoming by..."</p> <p>Marketing and Promotion Actions: "To encourage greater use of our paths, we shall..."</p>
<p>The document does appear to showcase a lot of the work that has already been done to develop greenspace within Falkirk - however we recognise you have done this to highlight what has been achieved and what can be done to develop and improve it further. As a result of all this good work and planning Falkirk Greenspace Initiative deservedly won the '2012 Scottish Awards for Quality in Planning' and has now been shortlisted for a UK wide award which is commendable.</p>	<p>Noted.</p>
<p>It would have been good if the document made a link to the Open Space Strategy (OSS). There are a couple of sections where there should be a strong link between the 2 documents e.g in section 5.4 (community growing initiatives) one of the actions refers to "investigating sites for potential allotment provision and community growing space". This is an action in the OSS and within the OSS you have already mapped potential new sites for allotment provision.</p>	<p>Noted.</p> <p>Section 5.4 already includes the action:</p> <p><i>"Identify who is responsible for each council-owned site identified in Falkirk Council's Open Space Strategy for potential allotment, community growing and orchard development"</i>.</p> <p>However, a reference has been added to section 5.3 Outdoor Access as follows:</p> <p><i>Working with partners, we shall develop strategic priority projects identified in existing strategies through:</i></p> <p><i>"Working towards implementing deficiencies in the access network as identified in the Open Space Strategy and the Core Paths Plan."</i></p>

RESPONDENT: Dorothy Watson, Built Environment - People, Performance & Supply Statistics, Communities Analytical Services, Scottish Government	
Comment Received	Proposed amendment / Council response
<p>I have had a quick look at figures relating to the Scottish Vacant and Derelict Land Survey and all looks good to me. There are just a couple of things that I thought I should mention.</p> <p>In section 5.2 you state that there are 139 hectares of vacant and derelict land (1% of our land area). The percentage may be more accurately stated as 0.5% (It is actually just less than 0.5% and so would round to 0% if rounded to the nearest whole number - I reckon that the calculation is 139 compared to 29,737 ha).</p>	<p>Agreed. Amend text to reflect revised figure:</p> <p><i>"0.5% of our land area".</i></p>
<p>I have also noticed on your map for section 5.2 that you have more vacant sites (49) compared to 44 in the previous text. Perhaps this is because the map is more up to date than the figure in the 2012 SVDLS publication?</p>	<p>Agreed. Amend figures within text:</p> <p><i>"...49 (60ha) are vacant urban land."</i></p>

RESPONDENT: Mike Batley, Mike Ewart, Emilie Wadsworth, CSFT	
Comment Received	Proposed amendment / Council response
<p>1.4 Why is a new strategy required?</p> <p>The Strategy's ability to be the expression of delivery for both CSF / CSGN objectives and LDP spatial priorities is crucial and cannot be overemphasised. This being the case we believe it is important to emphasise the options for delivery in this section as well. The fourth bullet touches on this, but could it go further?</p> <p>- Identify delivery mechanisms and partners so that effort can be focused on securing the strategic priorities on the ground</p>	<p>Agreed. Amend text in section 1.4, bullet 4, as follows:</p> <p><i>"- a renewed strategic approach to align future partnership effort and delivery mechanisms on priorities for action."</i></p>
<p>2.2 Central Scotland Forest</p> <p>The phrasing in the first paragraph could be misconstrued by some and we would suggest something that reflects the following in its place.</p> <p>Falkirk Council is a signatory partner of the Central Scotland Forest. CSFT is the lead partner in the CSF and hosts the support unit for the CSGN. CSFT is the principal local greenspace delivery partner for the Falkirk Council area.</p>	<p>Agreed. Amend text as follows:</p> <p><i>"Falkirk Council is signatory partner of the Central Scotland Forest (CSF) Strategy. However CSFT, it has recently been decided, will from April 2014 be known as the CSGN Trust and will lead the wider partnership of 19 local authorities in delivering this national development. Falkirk Council will continue to work with the new body to deliver the CSF. The Forest partnership's overall aim is to increase total woodland cover from 18% to around 24% of the Forest area over the next 20 years."</i></p>

<p><i>Falkirk Council Goals and Outcomes etc</i> This section through to that on the <i>Development Plan</i> has no numbering so this should be added.</p>	<p>Agreed. Amend text to include relevant numbering for sub-sections as follows:</p> <p><i>2.3 Local Context</i> <i>2.3.1 Single Outcome Agreement</i> <i>2.3.2 Falkirk Council Goals and Outcomes</i> <i>2.3.3 Development Plan</i></p>
<p>The characteristics of a Green Network in section 1.5 would be a useful cross reference at this point. So under Development Plan it may be worth adding,</p> <p>“The implementation of spatial policy within the LDP will provide the opportunity for green network delivery that is functional and sustainable, and is characterised by the elements set out in section 1.5.”</p> <p>This may be helpful as when development occurs, too often opportunities for green network development are either missed or there is a failure in its functionality.</p>	<p>Agreed. Amend text to include:</p> <p><i>“The implementation of spatial policy within the LDP will provide the opportunity for green network delivery that is functional and sustainable and is characterised by the elements set out in section 1.5.”</i></p>
<p><i>5.1 Economic Development and Placemaking</i> We suggest there may be value in highlighting the potential where appropriate to retrofit green infrastructure such as green roofs/walls.</p>	<p>Noted. Amend text in list of existing initiatives within “Landscape and environmental enhancement around businesses” section. Add text:</p> <p><i>“industrial site landscaping and/or retrofit green roofs/walls.”</i></p>
<p><i>5.2 Tackling Vacant and Derelict Land</i> Whilst we welcome seeing the analysis CSFT has carried out replicated in the strategy, we think it is probably not necessary to describe things in this detail, and suggest re-drafting the paragraph on <i>Objectives</i> so that this reads,</p> <p>“To strategically assess all vacant and derelict land within Falkirk in public ownership against their ability to deliver green network priorities through the assessment of a site’s contribution to meet social need, environmental benefits and spatial benefits and policy.</p> <p>Classify vacant and derelict sites within public ownership to identify priority sites that can secure the following outcomes:</p> <ul style="list-style-type: none"> - Temporary greening - Opportunities for advanced greening to create and / or enhance the landscape setting to encourage future development - Identify sites that meet or exceed the quality required for designation as wildlife sites - Identify sites that merit further intervention to benefit biodiversity or that may provide opportunities for recreation and community benefit 	<p>Agreed. Amend text as follows:</p> <p><i>“To strategically assess all vacant and derelict land within Falkirk Council area against their ability to deliver green network priorities through the assessment of a site’s contribution to meet social need, economic and environmental benefits.</i></p> <p><i>Classify vacant and derelict sites to identify priority sites that can secure the following outcomes:</i></p> <ul style="list-style-type: none"> - <i>Temporary greening</i> - <i>Opportunities for advanced greening to create and / or enhance the landscape setting to encourage future development</i> - <i>Identify sites that meet or exceed the quality required for designation as wildlife sites</i> - <i>Identify sites that merit further intervention to benefit biodiversity or that may provide opportunities for recreation and community benefit</i> <p><i>Where beneficial outcomes can be secured, develop an implementation programme with partners, Falkirk Council, CSGN Trust and</i></p>

Where beneficial outcomes can be secured, develop an implementation programme with partners, Falkirk Council, CSFT and Forestry Commission Scotland, to remediate vacant and derelict land within the Falkirk Council area”.	<i>Forestry Commission Scotland, to remediate vacant and derelict land within the Falkirk Council area”.</i>
<p><i>Orphan Land Projects</i></p> <p>CSFT has been contacted by the Litter Strategy Team in relation to orphan land sites. There is potential for CSFT support on sites of an appropriate nature. We would welcome reference to this within the strategy.</p>	<p>Noted. Amend text within action “Support Litter Strategy’s Orphan Land Project and Clean Zone campaign to secure community-led greening opportunities on appropriate vacant sites”:</p> <p><i>“The Greenspace Strategy will support these initiatives by:</i></p> <ul style="list-style-type: none"> <i>• exploring the potential of support from CSGN Trust in delivering Orphan Land Projects in partnership with Falkirk Council’s Litter Strategy.”</i>
<p><i>5.4 Community Growing</i></p> <p>We welcome the inclusion of this section. We suggest the following inclusions:</p> <ul style="list-style-type: none"> - Highlighting the educational links and opportunities within schools and their grounds for growing 	<p>Noted. We recognise the importance of educational links and opportunities for growing within school grounds, and have dedicated a whole chapter to Education Services and Schools (Section 5.5).</p> <p>However, for clarity, text amended as follows:</p> <p><i>“Community growing includes allotments, community gardens, land-share, community-supported agriculture, workplace growing, and edible landscapes. There is perceived high demand for all types of community growing space across the Falkirk Council area, and clear educational links and opportunities within school grounds. To help address this, some recent activity has taken place.”</i></p>
<ul style="list-style-type: none"> - Opportunities for including aspects of ‘edible landscapes’ into physical project delivery? 	<p>Agreed. Add text:</p> <p><i>“Consider opportunities for including aspects of ‘edible landscapes’ into physical project delivery.”</i></p>
<ul style="list-style-type: none"> - A set of CSGN Community Growing Actions have recently been developed, and may be worth being aware of. 	Noted.

<p>5.5 Education Services and Schools</p> <ul style="list-style-type: none"> - Cross reference with Community Growing section 	<p>Agreed. Amend text (paragraph 3) as follows:</p> <p><i>“...This includes the potential for on-site improvements to school grounds and play facilities, and includes the development of community growing space, orchard planting and wildlife sites. Off-site enhancements in greenspace areas near schools could also provide suitable outdoor learning space in the wider community environment.”</i></p>
<p>5.6 Woodland</p> <p>This section is very comprehensive, and we welcome its clear alignment with the CSF Strategy.</p> <ul style="list-style-type: none"> - Under the overview of woodland management progress, we suggest including mention of LTFP for Larbert Woods developed by CSFT on behalf of SLFD, along with the partnership approach to bringing the woodland back into management. 	<p>Agreed. Add text:</p> <p><i>“On behalf of Scottish Lowland Forest District (SLFD) CSGN’s predecessor, CSFT, developed the Long Term Forest Plan (LTFP) for Larbert Woods and, through a successful partnership approach, the woodland has been brought back into management.”</i></p>
<ul style="list-style-type: none"> - Under ‘Objectives’ remove one mention of the word ‘deliver’, e.g. ‘....work with CSFT and other partners to develop projects that help deliver CSF Strategy priorities’ 	<p>Noted. Text amended to remove duplicate word “deliver”.</p>
<p>Two other areas could be added under CSF delivery.</p> <ul style="list-style-type: none"> - Identify opportunities for advance woodland planting in advance of development that provide structural benefits within the habitat and recreational networks or as temporary greening in advance of the permanent re-use of the site. 	<p>Noted. Text within Section 5.1 Masterplanning added as follows:</p> <p><i>“Identify opportunities for permanent or temporary greening in advance of development.”</i></p> <p>Temporary/permanent greening could include woodland planting.</p>
<ul style="list-style-type: none"> - As the public sector increasingly moves to sustainable energy sources and in anticipation of the use of wood fuel boilers, secure tree planting opportunities for dedicated wood fuel crops in partnership with CSFT and Callendar Estates. <p>(Note – It is assumed here that Callendar Estates could be a management partner for this specific type of woodland as they are likely to be a supplier and outlet for future arisings).</p>	<p>Noted. However, wood fuel crop demand is market-led and such a collaboration would be a private business venture between CSFT or its successor CSGN Trust and Callendar Estate. Falkirk Council, as an energy user, must follow standard competitive procurement procedures through Public Contracts Scotland to achieve best value when purchasing goods and services.</p> <p>Any pilot or model for wood fuel involving Falkirk Council would need to be made through more appropriate strategy approaches, or revisions, most notably as part of Falkirk Council’s Sustainable Development and Climate Change Strategy.</p>

<p>5.7 Water Environment</p> <p>Under the section with SEPA there may be opportunities for working on sites over and above the Inner Forth Landscape Initiative. Through this group the Pow Burn has been identified as a priority and work within this catchment could include the remediation of the Waterslap site that is on the vacant and derelict land register. This could be captured by saying,</p> <ul style="list-style-type: none"> - Develop projects that improve water quality and contribute more widely to green network delivery through wetland and woodland development along tributaries to the River Forth including the Pow Burn. 	<p>Agreed. Include new bullet at 5.7 action to work with partners to develop projects identified in SEPA's Forth Multiple Benefits Project.</p> <p>Add text: <i>"Develop projects that improve water quality and contribute more widely to green network delivery through wetland and woodland development along tributaries to the River Forth including the Pow Burn."</i></p>
<p>As with 'Community Growing' there is also a new set of CSGN water environment actions around delivering these kind of projects on the ground.</p>	<p>Noted.</p>
<p>Dunmore Moss has now been removed from IFLI project list as the landowner cannot be contacted. However, the Central Scotland Peatland Forum have agreed to carry on trying to contact them in the hope the project can still be delivered at some point in the future.</p>	<p>Noted. Reference to Dunmore Moss Inner Forth Landscape Initiative project removed from text.</p>

RESPONDENT: Michelle Miller-Allan, Christine Bell, Communities Along the Carron Association	
Comment Received	Suggested Council Response
<p>Education Services and Schools section: Consider including references within this section to Communities Along the Carron Association's (CAAtCA's) work in delivering outdoor learning opportunities, particularly our work with Larbert High School. Much award-winning work has already been done especially with Larbert High School in this regard, and will continue to be a huge part of CAAtCA's Aims.</p>	<p>Agreed: Amend text as follows:</p> <p>Outdoor learning in local greenspaces:</p> <p><i>"We will work with Education Services and other partners (e.g. CSFT, Forestry Commission Scotland, Forth Environment Link, Scottish Wildlife Trust, and CAAtCA)..."</i></p> <p><i>"Continue to work with Larbert High School and CAAtCA, as a current priority, to deliver educational opportunities associated with the adjacent Carron Dams Local Nature Reserve."</i></p>