

Issue 12	Enhanced Green Networks and Cross-Boundary Green Networks	
Development Plan reference:	Enhanced Green Networks – pages 50-51, paras 5.17 – 5.21; Cross-Boundary Green Networks, page 14, para 3.9.	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>CALA Management Ltd (929806) Cramond and Barnton Community Council (803443) The Crown Estate (Scotland Portfolio) (039431) Cockburn Association (037249) Denholm and District Community Council (040612) Edinburgh Association of Community Councils (040476) Edinburgh BioQuarter Partners (037370) Esk Valley Trust (037349) Forth Ports Ltd (929573) Friends of the River Almond Walkway (925870) Mr Jon Grounsell (786916) Gullane Area Community Council (037068) Liberton and District Community Council (790396)</p>	<p>Mrs Mirabelle Maslin (928549) Midlothian Green Party (778339) Murieston Community Council (812156) National Trust for Scotland (040626) New Ingliston Ltd (929755) NHS Lothian Public Health and Health Policy (840024) ORS (037419) Rural Renaissance (039402) Mrs Gail Reid (035887) Roslin and Bilston Community Council (790524) RSPB Scotland (031480) Scottish Environmental Protection Agency (790577) Scottish Government (034404) Scottish Natural Heritage (790587) Scottish Wildlife Trust (038549) Mr Charles Strang (907037)</p>	
Provision of the Development Plan to which the issue relates:	Section 3, Spatial Strategy: Cross-Boundary Green Networks and Section 5, A Place for Communities: Enhanced Green Networks.	
Planning Authority's summary of the representation(s):		
<p><u>CALA Management Ltd (929806)</u> Green Networks should not be a factor in the determination of planning applications.</p> <p><u>Cramond and Barnton Community Council (803443)</u> Ensure River Almond corridor between Cramond Brig and Kirkliston is included in Edinburgh and West Green Network Priority Area.</p> <p><u>The Crown Estate (Scotland Portfolio) (039431)</u> Support Edinburgh and East Green Network Priority Area but would like to discuss this in relation to their landholdings. There is scope to link with paths already developed by the Crown Estate. The Crown Estate have already created a</p>		

Development Framework for land at Rosewell which is connected with promotion of housing sites and how these sites can connect into existing routes in and around Rosewell and the surrounding countryside. Would also support investigation of enhanced green network links between Rosewell and Easter Bush / Bush, and train stations at Newtongrange and Gorebridge.

Cockburn Association (037249)

Support in principle, but policy is seriously flawed due to erosion of Green Belt due to growth corridors. Support green networks which retain substantial areas of green belt and countryside.

Denholm and District Community Council (040612)

Berwickshire and southern areas of Roxburgh are not included in Green Networks but have landscape character and features. Attractive coastline to east lacks investment encouragement.

Edinburgh Association of Community Councils (040476)

Support, but paragraph 5.18 needs greater clarity in reference to making areas more attractive to investors. Areas adjacent to Green Networks may come under pressure for development.

Edinburgh BioQuarter Partners (037370)

Seeks greater detail / clarity on the second bullet point of paragraph 3.9, specifically 'developments for which land has already been allocated.'

The two Cross-Boundary Green Network Priority Areas referenced in the text are not explicitly identified in Figure 5.2. Second bullet of paragraph 5.21 is unclear, in particular the reference to developments for which land has already been allocated sits incongruously within the sentence. Similarly, the context that the Strategic Frameworks will provide for planning decisions, as referred to in the third bullet-point, should be clarified.

Esk Valley Trust (037349)

Support, particularly in east and south east. Concerned that non cross-boundary areas are left to member authorities to provide a non-statutory plan.

Forth Ports Ltd (929573)

Plan does not provide any justification for the non-statutory status of Frameworks to be prepared by member authorities. Frameworks could potentially promote inappropriate proposals and requirements in Forth Port's estate, where for security and safety reasons, public access is prohibited within operational ports. Class 35 of the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 does not accommodate opportunities for the promotion of Green Networks. Fife's LDP was modified as a result.

Friends of the River Almond Walkway (925870)

Support general principle of green networks and green corridors. Would like to see proper access to River Almond at Kirkliston, but not clear if this is included. River Almond Walkway should be made into a disability-compliant route.

Mr Jon Grounsell (786916)

Green Network strategy needs to take full cognisance of landscape setting, views and potential for enhancement including townscape and buildings in the countryside. A landscape character assessment is needed to inform Green Network strategy, assessing what exists at present and what improvements can be made and what impacts will follow from development. This section of the plan is not supported and should be modified to contain a greater emphasis on landscape. The green network strategy adopted by the proposed plan does not constitute a rigorous and effective appraisal of landscape qualities.

Gullane Area Community Council (037068)

North Berwick not included on Green Network area but this should have protection from Countryside around towns and other designations. Approach to enhancing green infrastructure should extend beyond the periphery of Edinburgh.

Liberton and District Community Council (790396)

Concerned that one of the aims of Green Network Priority Areas is to encourage investors and facilitate development beyond the boundaries of the strategic development areas.

D and L McAuslan

Support Green Networks. Concerned development of A701 relief road will mean additional housing which Green Network would be unable to support. A701 - concerned over loss of agricultural land in relation to A701 relief road.

Mrs Mirabelle Maslin (928549)

Critical paragraph 3.9 'Identify and safeguard those elements of the green network that provide, or have the potential to provide, the greatest benefits for people and nature.' is carried through. Publically accessible toilets should be considered in the development of green networks.

Midlothian Green Party (778339)

Support policy but concept is too limited and should include further means of protection for agricultural land and green belt.

Murieston Community Council (812156)

Poor alignment between Green Network Technical Note and Proposed Plan areas are not consistent. Livingston Masterplan, 1963 contains a structural landscape plan which created the natural features of Livingston. Proposed Plan does not reflect this aspiration from the original plans and is potentially detrimental.

National Trust for Scotland (040626)

National Planning Framework sets out ambition for National Ecological Network. Corridors should be sufficiently large scale to support species and habitats.

New Ingliston Ltd (929755)

Concerned Green Network Priority Area 7 will negatively impact on the delivery of the IBG site. Supplementary Guidance should take into account existing West Edinburgh Landscape Framework. Would welcome opportunity to contribute to guidance.

NHS Lothian Public Health and Health Policy (840024)

Support the emphasis on protecting and developing Cross-Boundary Green Network Priority Areas as this will have beneficial impacts on public health. Green infrastructure such as parks, playgrounds and other open spaces are particularly important in more urbanised areas. The decision to release some parts of the Green Belt for housing development is understood but it is important that this is not viewed as a model for future plans. One plan does not set the precedent for the next.

ORS (037419)

Concerned about the implications for existing Local Development Plan sites from the Green Networks Supplementary Guidance, particularly sites which already have planning approvals and Redheugh new community in Midlothian which is to be masterplanned. This could lead to unnecessary delay and complication.

Rural Renaissance (039402)

Green networks should not be drawn tightly around settlements as they will prevent expansion. Green networks should not be designated where other landscape designations exist due to lack of clarity. Scottish Borders approach to Countryside Around Towns will be detrimental economic, social and sustainability aims of the Plan by not allowing growth of settlements.

Mrs Gail Reid (035887)

Support policy which protects open spaces and places for people to walk and explore. Concerns about coalescence.

Roslin and Bilston Community Council (790524)

Path networks could seriously affect wildlife as a result of dog walkers. Green wedges and Green Networks are no substitute for Green Belt agricultural land. Green spaces are important for gardens and allotments.

RSPB Scotland (031480)

Support Green Networks. Unsure that cross-boundary priority areas can be achieved without inclusion in Local Development Plans. Would welcome chance to contribute. Disappointed Inner Forth Futurescape is not included in Green Network areas in the plan. Section could do more to support coordination between authorities in relation to sustainable flood alleviation. Sustainable flood alleviation through natural flood management (NFM), such as the creation of wetland habitats, has the ability to support climate-change adaptation as well as a range of wider benefits for biodiversity and also improving people's access to recreational space and green travel routes. Reference should be made to the 'Seas of Change' report (RSD12) and Inner Forth Futurescape (RSD13). River restoration should be considered to support adaptation to climate change. Plan should include policies to prevent further peat extraction and support restoration of peat sites. Proposed growth corridors present significant opportunities for enhancing biodiversity and green space.

Scottish Environmental Protection Agency (790577)

Supports benefits of green networks but consider these cannot be compensation

for loss of flood plain.

Scottish Government (034404)

Consideration of cross-boundary flooding matters through Supplementary Guidance on Cross-Boundary Green Network Priority Areas does not satisfy paragraph 261 of Scottish Planning Policy. Cross-boundary impacts on water management should be considered as a minimum.

Scottish Natural Heritage (790587)

Representation requests that the Forth Bridgehead area be reconsidered as a Green Network Priority Area in light of the amount of pressure and change being faced by this area. As part of green network priority areas it is not clear if specific actions for coastal opportunities are included for east and west Edinburgh and around Leven.

Scottish Wildlife Trust (038549)

There must be greater harmonisation with the Edinburgh Living Landscape especially since the City of Edinburgh Council are a founding partner. Considerable thought must be given to biodiversity and connectivity.

Mr Charles Strang (907037)

Proposed Cheviots National Park should be a Green Network Priority Area as area of great strategic importance for green network protection and enhancement.

Modifications sought by those submitting representations:

CALA Management Ltd (929806)

Paragraph 5.21: Delete 3rd Bullet Point.

Cramond and Barnton Community Council (803443)

Ensure River Almond corridor between Cramond Brig and Kirkliston is included in Edinburgh and West Green Network Priority Area.

The Crown Estate (Scotland Portfolio) (039431)

Suggests possibility to incorporate paths already created by the Crown Estate into Edinburgh and East Green Network Priority Area.

Cockburn Association (037249)

Paragraph 5.18: 1st bullet: Delete existing text, insert: 'Improving green networks in general will also make places more attractive for residents and investors'.

Add new 2nd bullet: 'By taking appropriate measures to reduce the dangers to wildlife crossing transport routes'.

Paragraph 5.21, 1st bullet: Delete: 'safeguard', insert 'protect'.

Denholm and District Community Council (040612)

No modification specified, representation indicates Berwickshire and southern areas of Roxburgh should be included in Green Networks section of the plan.

Edinburgh Association of Community Councils (040476)

Clarify paragraph 5.18 in relation to making areas more attractive to investors.

Edinburgh BioQuarter Partners (037370)

Amend second bullet point of paragraph 3.9 specifically to give greater clarity on 'developments for which land has already been allocated.'

Amend Figure 5.2 to identify Cross-Boundary Green Network Priority Areas.
Redraft second bullet of paragraph 5.21 to include greater clarity on developments for which land has already been allocated.

Esk Valley Trust (037349)

No modification specified, representation indicates concern that leaving non cross-boundary areas to individual member authorities is not a supported approach.

Forth Ports Ltd (929573)

The text at paragraph 5.21 should be amended to provide flexibility to accommodate necessary port operation requirements and those of other statutory or commercial operators who are unable to accommodate green networks for legitimate reasons. Amend paragraph 5.21 to: These frameworks will:

- Identify and safeguard, where possible, those elements of the green network...
- Identify strategic enhancements, where possible, to green networks...

Friends of the River Almond Walkway (925870)

Request that River Almond at Kirkliston is included in Green Network Priorities. River Almond Walkway should be made into a disability-compliant route.

Mr Jon Grounsell (786916)

Undertake a landscape character assessment for the whole region and consider landscape setting, townscape and views. Proposed Plan should be modified to contain more explicit references to landscape - this should take priority ahead of the enhanced green networks section of the plan.

Gullane Area Community Council (037068)

None specified, but representation notes that North Berwick is not included on Green Network Priority Area.

Liberton and District Community Council (790396)

The Plan should have a separate Green Network policy for areas in and not in strategic development areas.

Mrs Mirabelle Maslin (928549)

Publically accessible toilets should be considered in the development of green networks.

Midlothian Green Party (778339)

Include further means of protection for agricultural land and green belt.

Murieston Community Council (812156)

Request a review of Green Network areas. Livingston, especially south Livingston, should be included to protect it from development Include Area/Project 8 (East

Calder area, including the A71 corridor east to Edinburgh) and Area / Project 6 (Whitburn to Fauldhouse and settlements east along the Breich Water) are joined by extending Area/Project 6 east to Area/Project 8. As such the limit of the additional Green Network should be the River Almond to the North and Linhouse Glen nature reserve/Edinburgh to Carstairs rail line to the south.

New Inqliston Ltd (929755)

Supplementary Guidance should take into account the existing West Edinburgh Landscape Framework.

NHS Lothian Public Health and Health Policy (840024)

No modification specified, representation indicates it would be helpful to include a statement that emphasises the benefits of smaller areas of greenspace and open space beyond the Green Network Priority Areas.

ORS (037419)

Request wording of the second bullet point at paragraph 5.21 of the Proposed SDP be amended to: 'Identify strategic enhancements to green networks that will add value to existing settlements, and developments or allocations, where a detailed masterplan has not yet been produced or committed to'.

Rural Renaissance (039402)

Green Belt and Countryside Around Towns policies should not draw the boundary so tightly that there is no scope for future growth. In the interests of clarity, green networks should not be designated where there are already existing landscape designations.

Roslin and Bilston Community Council (790524)

Add that every development must have green space - possibly for allotments or leisure areas. Green networks are no substitute of green belt agricultural land.

RSPB Scotland (031480)

Green Networks are adopted into LDPs. Section could do more to support coordination between authorities in relation to sustainable flood alleviation. Reference should be made to the 'Seas of Change' report (RSD12) and Inner Forth Futurescape (RSD13). Consideration to green networks to the east of the SESplan area, i.e. extending along the A1 corridor to Haddington and Dunbar as this is identified as a strategic development area. Reference to Natural Flood Management and protection of deep peat.

Scottish Environmental Protection Agency (790577)

This objection can be addressed by the removal of 'Flood management' or the inclusion of a wording, to be agreed with SEPA, of what role green networks can have in mitigating flood risk.

Scottish Government (034404)

Consideration of cross-boundary flooding matters though Supplementary Guidance on Cross-Boundary Green Network Priority Areas does not satisfy paragraph 261 of Scottish Planning Policy. Cross-boundary impacts on water management should be considered as a minimum.

Scottish Natural Heritage (790587)

Frameworks must consider delivery mechanisms. Clearer direction needed in paragraph 5.18 to guide LDP work on non-statutory frameworks, including a hook in the technical note. Further consideration given to Forthbridgehead area and potential for this to be allocated as a Green Network Priority Area. Clarity required on whether specific actions for coastal opportunities are included for east and west Edinburgh and around Leven.

Scottish Wildlife Trust (038549)

There must be greater harmonisation with the Edinburgh Living Landscape especially since the City of Edinburgh Council are a founding partner. Reference should be made to the need to invest properly in natural capital and green infrastructure (Para 3.10). Include reference to Edinburgh Living Landscape (Para 3.17 RSD14).

Mr Charles Strang (907037)

A strategic framework should be prepared for three cross boundary Green Network Priority Areas. Reference to the need for management plans for National Scenic Areas as part of Local Development Plans. Modify paragraph 3.9 to include the northern Cheviots and on into the Tweed Valley from the Pennine Way as a Green Network Priority Area. A Green Network should be identified within the Scottish Borders linking to the Pennine Way.

Summary of responses (including reasons) by Planning Authority:

Plan policy / text

CALA Management Ltd (929806)

Disagree with modification. This direction is deliberately in bold so as to provide clear guidance to member authorities on this issue. Green networks have a range of benefits and are intended to enhance development, not preclude it from taking place. The Development Plan for each member authority comprises the relevant LDP and the Strategic Development Plan. Green networks perform a wide range of benefits – they are not substitutes for Green Belt and do not perform the same function. **No modification proposed.**

Cockburn Association (037249)

Disagree with modifications. No clear benefit can be seen from the alternative / minor modifications to text being proposed. The Proposed Plan is intended to be a concise, visionary, map based document. The list of benefits provided by green networks (paragraph 5.18) is not intended to be exhaustive. **No modifications proposed.**

Cockburn Association (037249), Edinburgh Association of Community Councils (040476)

Disagree that first bullet point of paragraph 5.18 'Improving quality of place to make the area more attractive to residents and investors' needs amended or clarified. Green networks have a range of benefits for residents and businesses. The second line of para 5.18 clearly states that 'Well designed, multi-functional green networks are a fundamental component of successful places.' **No modifications proposed.**

Edinburgh BioQuarter Partners (037370), ORS (037419)

Disagree with modifications. Local authority boundaries are shown on Figure 5.2 to allow the reader to identify which Green Network Priority Areas are Cross-Boundary areas. CBGNs are identified on Figure 5.2 and appear as 7+8 on this diagram. Supplementary Guidance will provide greater detail on paragraph 5.21, including land and development for which land has already been allocated. **No modifications proposed.**

SESplan does not consider the proposed minor alteration would add any value to the Proposed Plan. The existing wording in paragraphs 3.9 and 5.21 is consistent and is intended to give clear direction to member authorities in relation to non-statutory frameworks for Green Network Priority Areas. It is not the purpose of the plan to examine individual sites. The green network frameworks will be informed by a range of factors, including consented development. **No modification proposed.**

Esk Valley Trust (037349)

Although guidance for non cross boundary Green Network Priority Areas will be non-statutory, the inclusion of green networks in the Proposed Plan means they are part of the development plan as a whole and therefore must be considered by member authorities. **No modification proposed.**

Forth Ports Ltd (929573)

Disagree with modification. The bold text makes clear that frameworks will 'identify and safeguard those elements of the green network that provide, or have the potential to provide, the greatest benefits for people and nature'. This does not preclude development from taking place in Green Network Priority Areas, but it does make clear that all development must take treatment of green networks and enhancements into account. Green Networks do not necessarily mean public access; they fulfil biodiversity and other environmental functions. **No modification proposed.**

Mr Jon Grounsell (786916)

Disagree with modification. Following the adoption of SDP1, extensive early engagement was undertaken with member authorities and key agencies, including workshops to analyse and evaluate the best approach to green networks for SDP2, in line with NPF3 and SPP. The findings of this early engagement has been incorporated into preparation of SDP2, and the Green Network Technical Note (October 2016 ASD59) contains more details on individual Green Network Priority Areas. **No modification proposed.**

New Ingliston Ltd (929755)

The proposed IBG is intended to have a high quality landscape framework. It has been acknowledged that multiple strategies already apply in this area, including the West Edinburgh Landscape Framework. Green Networks do not preclude development, they are intended to enhance it. **No modification proposed.**

NHS Lothian Public Health and Health Policy (840024)

The benefits of smaller scale green infrastructure and access to green / open space is clearly referenced in the Placemaking Principles section of the Proposed

Plan. **No modification proposed.**

Midlothian Green Party (778339)

Disagree with modification. This is dealt with elsewhere in the plan. The Placemaking Principles contains a clear direction in relation to agricultural land, and the Green Belts and Related Countryside Designations has guidance on Green Belts. **No modification proposed.**

Roslin and Bilston Community Council (790524)

Disagree with modification. Not considered appropriate to add a requirement at strategic plan level which dictates that all development must have green space. The Placemaking Principles section of the plan contains clear guidance on development and green infrastructure. SESplan do not consider Green Networks as substitute for Green Belt. **No modification proposed.**

RSPB Scotland (031480), Scottish Government (034404)

It is not the role of Supplementary Guidance to look at cross boundary flooding issues. More detail on strategic flooding is set out in the Placemaking Principles and Key Areas of Change sections of the Proposed Plan. The Placemaking Principles include a number of flood risk related requirements, while more specific local issues have been identified in the Key Areas of Change section of the plan for South East and Edinburgh and West. SESplan's Strategic Flood Risk Assessment (ASD01) has been produced to inform the Spatial Strategy of the Proposed Plan. The updated addendum (ASD53) will provide member authorities with additional information. **No modification proposed.**

Rural Renaissance (039402)

Green Networks identified in SDP2 are large strategic areas and are not tightly drawn – their exact application will be through Supplementary Guidance and member authorities. Green networks provide different functions beyond specific landscape designations. It is not the purpose of SDPs to repeat policies from elsewhere. Countryside Around Town designations are a matter for LDPs. **No modification proposed.**

Scottish Environmental Protection Agency (790577)

The Placemaking Section of the Proposed Plan makes clear reference to locating development away from functional flood plains. SESplan agree that green networks should not be compensation for loss of flood plain. If the reporter is so minded, text could be made clearer at paragraph 5.18. **No modification proposed.**

Scottish Wildlife Trust (038549)

It is acknowledged by SESplan that multiple strategies already apply in this area. Strategies such as ELL may be applied at member authority / LDP level. **No modification proposed.**

Spatial Strategy

Cramond and Barnton Community Council (803443), Friends of the River Almond Walkway (925870), Murieston Community Council (812156)

Following consultation at the Main Issues Report, SESplan have rationalised and enlarged the Edinburgh and West Green Network Area to form a larger, cross

boundary area which includes the River Almond, and the A71 corridor. It is considered appropriate to retain separate designation for Whitburn to Fauldhouse (Strategic Green Network Priority Area 6 – Polkemmet and Briech Water) as this has distinct characteristics from the Edinburgh and West Green Network Area. More detailed considerations can be assessed in LDPs where appropriate. **No modification proposed.**

The Crown Estate (Scotland Portfolio) (039431)

Note the response. This is a detailed matter for consideration in forthcoming supplementary guidance and LDPs. **No modification proposed.**

Denholm and District Community Council (040612), Rural Renaissance (039402), Mr Charles Strang (907037)

One Strategic Green Network Area has been identified for the Central Borders Area. This includes the Central Borders and Western Borders. The area has relatively high levels of development proposed, a growing tourism role and is served by Borders Rail. The nine themes used to assess and allocate Green Networks are outlined in the Green Network Technical Note (October 2016 ASD59). The existing allocation was considered to have the closest alignment with these nine themes compared to other areas in the Scottish Borders. Other areas including the Cheviots, Berwickshire / Eastern Borders and southern Roxburghshire are not the focus of the same level of development and do not suffer from the same level of deprivation or vacant and derelict land issues, so are better served by green networks at the LDP level. The Scottish Borders is not within the Central Scotland Green Network (National Development in NPF3 – ASD40).

SESplan do not support identifying Scottish Cheviots as a third Cross Boundary Green Network Priority Area. A planning authority is given no role in the proposal of, or creation of, a National Park. The Scottish Ministers have the jurisdiction to propose, and to make a designation order for, a National Park following advice from SNH. It is not considered the role of SESplan and the SDP to confirm such designations.

Green networks are intended to enhance development, not prohibit it. **No modification proposed.**

Gullane Area Community Council (037068)

The East Lothian Coast is covered from Edinburgh to Longniddry by the Edinburgh and East Green Network Priority Area. Much of the remaining East Lothian Coast is already covered by existing statutory protections and designations. Green networks at the local level are best devolved to the East Lothian LDP. **No modification proposed.**

Liberton and District Community Council (790396)

Disagree with proposed modification. The Proposed Plan defines green networks as connected areas of green and blue infrastructure and aims to identify and enhance green networks at a strategic level across the plan area. This approach will be supported by Placemaking Principles (pages 16 - 17), in addition to Supplementary Guidance in the form of Strategic Frameworks for the two Cross-

Boundary Green Network Priority Areas and non-statutory Frameworks for the remaining Green Network Priority Areas. It is not considered appropriate to adopt a different policy for green networks depending on whether or not they are located in an area of strategic growth – this could undermine connectivity and integration of green networks. SDP2’s approach to green networks was developed after the Main Issues Report stage and used extensive early engagement with member authorities and key agencies. A more detailed appraisal of each Green Network Priority Area can be found within the Green Network Technical Note (October 2016 ASD59). The preferred approach is to identify the key strategic green network requirements, while setting a vision for local green network development as an integral element of the Placemaking Principles. While the SDP will illustrate the strategic connections and principles for green network development it is intended that the LDPs will set out the more detailed plans and proposals for sites within the areas of strategic development, as well as identifying more local-level green network priorities, as appropriate. **No modification proposed.**

National Trust for Scotland (040626)

Corridors have important biodiversity benefits. Finer detail of each green network will be set out in Supplementary Guidance, LDPs and other relevant member authority guidance. **No modification proposed.**

Mrs Gail Reid (035887)

The Spatial Strategy and Placemaking sections of the Proposed Plan contain clear direction to member authorities aimed at the prevention of coalescence. **No modification proposed.**

RSPB Scotland (031480)

Green networks at the local level are best devolved to the East Lothian LDP. **No modification proposed.**

Scottish Natural Heritage (790587)

Three areas are already identified as priority areas in Fife. These are considered greater in terms of green network priority as they have a greater alignment with green network themes than the Fife Bridgehead area. **No modification proposed.**

Other issues

Mrs Mirabelle Maslin (928549)

This is not a comment on a strategic plan matter. The SDP exists to set out strategic directions for growth and locations for investment and is intended to be a visionary, concise, map based document. Provision of public toilets can be assessed at a local level. **No modification proposed.**

23 representations of support for this section of the Proposed Plan are noted.

Reporter’s conclusions:

[Note: For DPEA use only.]

Reporter’s recommendations:

[Note: For DPEA use only.]