1 Introduction

1.1 The public consultation for the Orkney Open Space Strategy took place for eight weeks from the 8th May until the 3rd July 2014 to align with Community Council meeting dates.

2 Consultation Methods

Public advertisement

2.1 An advert was placed in the Orcadian newspaper and a press release was issued on the 8th May. An interview for BBC Radio Orkney was aired on Monday 12th May.

Public display of documents

2.2 Hard copies were available for reference at the One Stop Shop in Kirkwall, Stromness Cash Office, Orkney Libraries and the Mobile Library vans. The document was also available online on the Council’s website.

Letters to key agencies

2.3 Letters were issued to key agencies to advise of the consultation.

3 Consultation Results

3.1 There were 6 responses to the consultation. The informal consultation that had taken place prior to this with internal and external partners may have had a bearing on the low response rate. Key issues raised include:-

3.1.1 The status of the Pitch and Facilities Strategy as referred to in the Action Plan in section 5.
3.1.2 Clarity as to the range of open spaces, as well as the range of documents, considered as part of the OOSS: Vision and Action Plan.
3.1.3 To develop open space provision standards to inform proposal expectations.

3.1.4 Clear indication of vision objectives as referred to within vision diagrams and text.

3.1.5 Appropriateness of indicators as part of the Action Plan and their measurability.

3.1.6 Clarification of key delivery partner involvement and tasks to better reflect role open space can play as part of flood mitigation and expertise involved.

3.2 Key changes to the document include:-

3.2.1 Reference to the Placemaking Principles in terms of their applicability in promoting a design led approach for open space provision as per section 2.2.

3.2.2 Acknowledgement of the Weyland Development Brief in Kirkwall vision diagram.

3.2.3 “Completion of Pitch and Facilities Strategy” stated as a separate task as per 1.2.1 and its status clarified in tasks 1.2.2 and 1.2.3.

3.2.4 Diagram inserted into section 1.4 to help explain the development of the Orkney Open Space Strategy: Vision and Action Plan more clearly and the relationship to other documents.

3.2.5 Vision objectives are acknowledged in key of vision diagrams and reinforced within introductory text of paragraphs 2.3, 2.4, 2.5, 2.6 and 2.7 to highlight the correlation between diagram and text.

3.2.6 Section 3.2 title amended to “Community led usage of open space”.

3.2.7 Indicators updated as part of actions 1.2, 1.3 and 1.4 along with tasks 3.1.2, 4.1.1, 2.1.1 and 2.2.2.

3.2.8 Tasks 5.2.1 and 5.2.2 have been updated to reflect key services involved in flood mitigation.

3.2.9 New tasks 5.2.3 and 5.2.4 added to reflect involvement and expertise in relation to open space and its role in flood mitigation

4 Conclusion

4.1 Full details for the reasoning behind these proposals are included in the Consultation Report at Appendix 1.
Orkney Islands Council

OOSS: Vision and Action Plan
Participation Statement and Consultation Report

Consultation Period: 8th May 2014 – 3rd July 2014

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<tr>
<th>Representation</th>
<th>Consultee Type</th>
<th>Consultee Number</th>
<th>Comment Number</th>
<th>Comments</th>
<th>Response from Planning Authority</th>
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<td></td>
<td>IG</td>
<td>50</td>
<td>001</td>
<td>Thank you for consulting with [redacted] on the current draft of the Open Space Strategy. We previously provided comments to you on the March version of this document, and you helpfully provided us with your response to these comments. Related to this, from reviewing this document a second time, it would appear that there are no changes from the first draft upon which we would wish to comment. The only aspect of the document that we do wish to make further comment on is the reference to the Pitch and Facilities Strategy in the action plan under action 1.2, upon which we previously commented. It is my understanding that the strategy is still in draft form, and Garry Burton has approached us with a view to thinking how this document can be progressed; I am hoping to discuss this with [redacted] when I meet with him in early June at the Regional Sporting Partnership meeting in Orkney. The reference in the action plan suggests that strategy is in a finalised state that can be used to inform decision making on pitches, which it is not considered to be at present, and so I think it would be more appropriate to include a separate action on the need to finalise the strategy, or to modify the action to ensure that its current status is clear.</td>
<td>Noted.</td>
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<td>KA</td>
<td>10</td>
<td>001</td>
<td>To assist with streamlining the planning process, we</td>
<td>Noted.</td>
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AP1 “Completion of Pitch and Facilities Strategy” stated as separate task as per 1.2.1. Indicators for tasks 1.2.2 and 1.2.3 amended to “Vision to be updated in line with completed Pitch and Facilities Strategy” in connection with this.

Once completed and adopted, the Pitch and Facilities Strategy will inform tasks 1.2.2 and 1.2.3 as part of the future review of the OOSS: Vision and Action Plan. This should address concerns regarding the status of the Pitch and Facilities Strategy.
now focus our site specific advice in development management and local plans where we can add best value in terms of enabling good development and protecting Scotland's environment. We have therefore provided standing advice applicable to this type of small-scale local development which is available at www.sepa.org.uk/planning.aspx.

However, if you are seeking comment on some site specific issue, such as flood risk, which is not adequately addressed by our standing advice, we would welcome the opportunity to be re-consulted. The reason for consultation should be clearly indicated in the body of the email or letter.

Guidance on How and when to consult SEPA and our Standing advice for small scale local development is available on our website at www.sepa.org.uk/planning.aspx.

Please note that we are supportive of planned or protection of open space as it can provide multiple benefits to the aspects of the environment in which we have an interest. This includes protecting flood plains, providing green networks, allowing space for natural morphological changes in watercourses and providing areas for SUDS. In this specific case, however, having reviewed the vision and action plan, we have no detailed advice or comments to make on the draft document.

| KA | 02 | 001 | Page 1 para 1.1.3 This states that only publicly accessible space is included in the audit, but para 1.1.5 refers to sports centres (although it is not clear if this is outdoor and/or indoor) and 1.2.1 refers to private gardens and residential. As a result it is not clear what is included. Paragraphs 1.1.3 and 1.2.1 relate specifically to the content of the audit and the findings from this. 1.1.5 highlights that the OOSS: Vision and Action Plan in addition to this, encompasses private sports facilities as part of looking at open space provision at a more strategic level. AP2 Para 1.1.5 amended to state outdoor sports facilities for clarity. |
Page 1 para 1.1.4 It should be made clear that the Orkney OSS is made up of more than one document and is informed by other documents. It should be set out what these are and how they fit together – a diagram would be helpful (1.3.1 and 1.3.2 refer to various documents.)

In the settlements section there are further references to Development Briefs (eg pages 7 and 9) and the diagram could highlight how these fit with the OSS.

Page 2 para 1.2.1 There are references to the existing amount of open space per person. However, it is not clear what this means for future provision. It would be helpful to develop standards for the provision of open space, as set out in PAN65.

AP3 Diagram inserted into section 1.4 to help explain the development of open space guidance more clearly and the relationship to other documents.

Noted. See AP3.

These values are to provide a reference point as part of future revisions as to how open space provision has changed within the five settlements. This in combination with the accessibility criteria will provide a better gauge as to how open space provision has evolved within the five settlements the Orkney Open Space Audit focuses on. Whilst standards have been given for guidance regarding open space provision for new housing developments in para 4.1.2 OSS: Planning for Open Space SG, these are indicative only stipulating such provision “should be proportionate to the scale of the development, specific to the context of the proposal, and be realistic in relation to the expected level of use”. It was deemed inappropriate to state specific open space standards due to the varied nature of planning applications and site conditions with open space of a “high quality, serve the needs of the local community and enhance the surrounding environment” encouraged as per para 3.3.1 OSS: Planning for Open Space and to be demonstrated as part of the planning application process. This is reinforced by the difficulty to quantify how much open space is necessary, hence the usage of the accessibility standard due to the importance access to open space can have on health as detailed within the Orkney Open Space Audit. Whilst a more context specific standard may be desired, it is acknowledged this would require funding to fulfill a study of this detail.
The Greenspace Scotland report ‘Developing Open Space Standards’ (2013) provides detailed guidance to councils on developing standards. The report states that once the standards have been set the strategy should include a settlement/Neighbourhood description that provides a summary of the provision, an interpretation of the impact of the standards and priorities for action.

The references to ‘typology codes’ are not easy to read. These could be replaced with a table showing the typologies. In the text it would then be appropriate to just refer to the titles without the codes as well. There are references to ‘average scores.’ It should be clear that these are referring to ‘quality.’

It would be more informative to set out the average scores for all the typologies listed rather than just referring to highest or lowest – some of the typologies already have this.

It would also be more informative to know how many of the proportion of sites that were scored as being of poor, fit for purpose, or good quality. This is partly done in one of the bullets.

The thresholds for each of the quality levels should be identified. Again this information could be presented in table format.

Page 3 para 1.3.3 Adding in the text of Policy D6 from the ‘Plan’ would add clarity, e.g. in a separate box. It should also be clarified that the reference is to the Orkney Local Development Plan (with date).

Page 4 para 2.1 This section states that ‘visions’ and ‘vision objectives’ are set out for each of the five settlements is given within the Orkney Open Space Audit with the key aspects from this summarised within the O OSS: Vision and Action Plan vision diagrams of which accessibility and quality are key drivers as similarly referred to in the Developing Open Standards guidance.

Para 1.2.1 provides an overview of the key points raised from the audit with the codes kept in for ease of reference if needed to refer to the more comprehensive tables and graphs within the audit. Para 1.2.1 bullet point section on average scores stated more clearly as “average quality score”.

Noted. It is deemed reference to the Orkney Open Space Audit is more appropriate as provides more comprehensive tables and graphs within the audit. Para 1.2.1 amended to state “The full details of open space provision within Orkney can be found within the Orkney Open Space Audit.”

AP6 summary text and table showing the number of audited open spaces to achieve the indicated overall scores inserted as part of para 1.2.1.

As part of AP6 score thresholds align with those given in O OSS: Planning for Open Space SG and Orkney Open Space Audit.

AP7 inserted text of Policy D6 within section 1.3 as per the Orkney Local Development Plan.

The vision objectives correlate with the vision diagram and are cross referenced. Each is expanded upon as to how
| Settlements. None of the sections 2.2 – 2.6 have visions or objectives presented clearly in the text. Pages 5-15 Maps and following text – general comments. The map key should include the letters from the map (A, B, C etc) and the name of the area each one refers to. For example in Figure 1 A – Hatston. Categories ‘Key Open Spaces’ and ‘Open Spaces to Consider’ could also be marked on the maps and added to the key. The bulleted lists following each of the settlement maps could be more effectively and clearly presented. For each area there could be a vision, well defined objectives, followed by clear options/actions/ to achieve the objectives and address the identified need/deficiency. At present this is only partially, and not consistently, done in the text. The options presented tend to be rather loosely worded or vague. It is not really clear what is meant by ‘Open Spaces to Consider’ which are sometimes listed for areas. For example, on page 6, the Berstane Road entry refers to improving quality. It is not clear if the spaces listed are those that are of poor quality and that other space exists that are better, or if they are the only spaces. It would be clearer to identify those spaces that should be prioritised for improvement based on the audit findings. This would make any requirements from planning permissions or limited resources more robust and linked back to the evidence base. | can be improved and the open spaces that could help achieve this. **AP8 Vision objectives are acknowledged in key of vision diagrams and reinforced within introductory text of paragraphs 2.3, 2.4, 2.5, 2.6 and 2.7 to highlight the correlation between diagram and text. Each letter conforms to an area specific objective, normally correlating with a particular aspect highlighted in the vision diagram i.e. area of low scoring spaces. The highlighted area informs what open spaces are to be considered within ‘Key Open Space’ or ‘Open Spaces to Consider’ to achieve the related objective. Further details of the open space can be found within the OOSS: Planning for Open Space SG and Orkney Open Space Audit as stated in para 2.1.1. Noted. The objectives provide guidance to address strategic deficiencies in terms of open space provision which would be in conjunction with fulfilling the requirements as outlined in section 3.3 Planning and design principles within OOSS: Planning for Open Space SG to help ensure more detailed aspects of open space proposals are taken into consideration. Noted. Those listed as “Open Spaces to Consider” are spaces that are situated within that objective area i.e. area of low scoring spaces. Those deemed to be of greater strategic importance in helping achieve the related objective are stated as a ‘Key open space’. |
Sometimes the text refers to Development Briefs, eg pages 7 and 9. It should clarify whether these are published/adopted and it would be helpful to identify/map what open space intervention is to be provided. The Vision and Action Plan should bring all the different strands together to demonstrate the strategic impact of what is being sought.

Page 17 para 3.2 While titled ‘temporary use of open space’ this section appears to be more about quality and multi-functionality of residential amenity spaces, driven by community involvement – rather than temporary use. Annex 1 does not identify any key points that need to be considered by groups, but just appears to be a sample legal agreement.

Page 19 Action Plan – General comments
Some of the indicators need to be improved:
- 1.2 to 1.4 - indicator is to compare results with previous audit findings. This is rather vague and does not provide anything specifically measurable.
- 3.1.2 - indicator refers to the number of spaces achieving a ‘good’ score. This could be changed to measure the percentage change to provide a more meaningful indicator.
- 4.1 - indicator is vague and it should be made clear which specific statistics and survey results will be used and how the performance will be measured.
- 2.1.1 refers to the number of green network projects fulfilled with a timescale of October 2014. This is a very short timescale for implementing projects?

Page 31 Annex 2, the user feedback form, is not

Achieving this would depend on the prescriptiveness of the development brief in how it prescribes open space requirements and how they are met. Even so it is considered more beneficial to take account of open space provision and its implications on the Orkney Open Space Audit, O OSS: Planning for Open Space SG and the O OSS: Vision and Action Plan once development has taken place rather than project this before completion of the development as this may change as part of the planning application and construction process. This information would inform the review process of each document thereafter.

AP9 Section 3.2 title amended to “Community led usage of open space”.

Noted. Comparison to previous audit findings would provide indication towards various aspects including change in quality and quantity. This is stated more clearly within indicators for clarity as outlined below.

AP10 Actions 1.2, 1.3 and 1.4 indicators updated to state “in terms of changes in quality, accessibility and quantity of provision.”

AP11 Task 3.1.2 indicator amended to “Total percentage change of all open space in terms of score achieved in accessible and well connected criteria from previous audit.”

AP12 Task indicator 4.1.1 amended to “Range of documents and initiatives that promote access and usage of open space.”


The user feedback forms are stated within para 4.1.1 as a
mentioned anywhere in the body of the document, so it is not clear what purpose it has, how it will be used, or how it is related to the OSS

**KA 3001** We are more than happy to feed into the initiative as suggested at 4.2.2 and already do various things such as the Science festival using external spaces and we could do more in terms of encouraging visitors and local people to visit conservation works when we are carrying out works to the Earl’s and Bishop’s Palaces.

**KA 3002** We welcome the preparation of this vision and action plan and the role it will play in the delivery of the Open Space strategy. We note that have been named as a member of the Orkney Open Space Working Group and in light of this we would be happy to discuss any role we may have with the council as the plan progresses.

The actions listed against my name, as the representative of are all related to planting and grounds maintenance. Both of those are very important to the success and use of open space and are something the has involvement with on a daily basis. I was however, disappointed to see that there is no suggestion of any direct involvement from ensuring that flood mitigation is considered as part of development proposals (Objective 5.2).

The aspects of flood mitigation that I consider might benefit from input from are:

- The identification of and assessment of potential for sustainable drainage, necessary as part of developments, to provide useful amenity space. That may be within developments or at the edges -- perhaps with an interface with other open space creating a larger or more diverse means to help monitor and implement the OOSS: Vision and Action Plan. This is with the intention to be made readily available online and paper copies made available elsewhere.

**Noted.** Role as part of working group clarified and discussed as part of involvement to benefit the membership and expertise represented in the working group.

**AP14** Tasks 5.2.1 and 5.2.2 have been updated to reflect key services involved in flood mitigation.

**AP15** New tasks 5.2.3 and 5.2.4 added to reflect involvement and expertise in relation to open space and its role in flood mitigation:

5.2.3 “The identification of and assessment of potential for sustainable drainage, necessary as part of developments, to provide useful amenity space.”

5.2.4 “Recognition of the importance of overland flow routes, needed during times of exceedance or when devices fail, within areas to be developed.”
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<td></td>
<td>• Recognition of the importance of overland flow routes, needed during times of exceedance or when devices fail, within areas to be developed.</td>
<td>The above points will have an impact upon the shapes of development areas, plots and communication routes through those areas.</td>
<td>In my view, input from on the above points and other associated Objectives such as improving open space networks and linkages could be valuable.</td>
<td>See AP15.</td>
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Agreed that utilising the wide range of expertise open space can entail will greatly benefit the fulfilment of the strategy and improving open space provision in Orkney.