

Issue 4	Bonnybridge & Banknock Housing Sites	
Development plan reference:	<u>Chapter 4 Settlement Statements</u> Bonnybridge and Banknock (pages 26-27) <u>Appendix 1 Site Schedule</u> Housing - Bonnybridge and Banknock (page a1-02) Mixed Use – Bonnybridge and Banknock (pages a1-12 & a1-14) <u>Appendix 2 Strategic Growth Areas</u> Banknock (page a2-03) Dennyloanhead (page a2-04) <u>Proposals Map 1</u> Banknock, Bonnybridge, Denny, Allandale, Greenhill & Torwood	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
Mactaggart and Mickel Ltd (00011) Bellway Homes Scotland (00482) Mr Andrew MacBeath (01279) Manor Forrest Ltd (00455) St Josephs RC Parent Council (01084) Scottish Government (Historic Scotland) (00643) I and H Brown Limited (00609) National Grid C/o AMEC E & I UK Ltd (00583) Scottish Canals (00516) Broomside Properties (01156)		
Provision of the development plan to which the issue relates:	The allocation of specific sites for housing in Bonnybridge, High Bonnybridge, Banknock and Dennyloanhead as identified in the Bonnybridge and Banknock Settlement Statement, and detailed in Appendices 1 and 2.	
Planning authority's summary of the representation(s):		
<p><u>Allocated Housing Site H08 - Dennyloanhead</u></p> <p>Mactaggart and Mickel Ltd (00011/2004/009):- The continuing allocation of the site at Dennyloanhead (H08) is supported.</p> <p>Bellway Homes Scotland (00482/2001/001):- The continuing allocation of the site at Dennyloanhead (H08) is supported. The site has recently been signed off as effective by both Falkirk Council and Homes for Scotland. This provides a clear context to support the site's continuing allocation in the LDP.</p> <p>Bellway Homes Scotland (00482/2001/002):- A first phase of Proposal H08 (Dennyloanhead) comprising 50-100 houses should be allowed to come forward to assist in funding the Section 75 obligations attached to the site. Bellway Homes</p>		

own a part of the site (RD4.7) which benefits from an existing freestanding access that can be utilised to deliver a first phase of development. If the wider site remains undeveloped or is shown to be ineffective, then approval is sought for the Bellways Homes part of the site to come forward as a standalone development.

Mr Andrew MacBeath (01279/2001/001):- Objection is made to the site at Dennyloanhead (H08). The proposed development of this site would spoil the woodland view from the Mr McBeath's property (21b Glasgow Road) and destroy the natural wildlife habitat that is currently there.

Allocated Housing Site H12 - Broomhill Road, High Bonnybridge

Manor Forrest Ltd (00455/2003/001):- The continuing allocation of the site at Broomhill Road (H12) is supported. The site is currently in commercial/industrial use and benefits from planning permission in principle for the development of the land for residential purposes (RD4.2).

The previous outline planning permission decision notice for the site has also been submitted (RD4.1)

St Josephs RC Parent Council (01084/2001/001):- Objection is made to the site at Broomhill Road (H12). The development of this site will unacceptably increase road traffic and on street parking along Broomhill Road to the detriment of public safety (particularly of children from St Joseph's Primary). Current local infrastructure, roads, facilities and sewers cannot accommodate additional housing development at present.

Allocated Housing Site H13 - Seabegs Road, High Bonnybridge

Scottish Government (Historic Scotland) (00643/2001/005):- Development of site H13 (Seabegs Road) may have an adverse impact on the historic environment. Any development taken forward will need to be supported by a detailed heritage assessment to demonstrate the extent of its impact on the setting of the scheduled monuments in its vicinity. Pre-application consultation should be carried out with Historic Scotland for any developments coming forward at this site.

Allocated Mixed Use Site M03 - Banknock North

I and H Brown Limited (00609/2001/001 & 005):- The continuing allocation of the site at Banknock North (M03) is supported. However, a modification is sought to the site capacity. A housing capacity of 504 units is less than what planning permission was sought for. The current planning application (P/10/0360/PPP), which is minded to grant subject to the signing of a S75 agreement, is for up to 550 residential units. The eventual planning consent will be subject to a restrictive condition, restricting the development of the site to 504 residential units unless a further traffic impact assessment can demonstrate that suitable roads capacity can be made available for the additional residential units. This is considered to be achievable (CD62).

Allocated Mixed Use Site M15 - East Bonnybridge

National Grid C/o AMEC E & I UK Ltd (00583/2002/002):- No permanent structures should be built over the pipelines which affect site M15 (East Bonnybridge) and various restrictions apply to development in and around pipelines which the developer should be made aware of. The requirement to consult the HSE is noted. A link to guidance for development is provided which should be made available to the developers of the site.

Scottish Canals (00516/2001/003):- Site M15 (East Bonnybridge) should be highlighted as an opportunity to integrate with the canal, for developer contributions to canal improvements and facilities with potential for surface water discharge to be taken into the canal.

Scottish Government (Historic Scotland) (00643/2001/006):- Development of site M15 (East Bonnybridge) may have an adverse impact on the historic environment. Any development taken forward will need to be supported by a detailed heritage assessment to demonstrate the extent of its impact on the setting of the scheduled monuments in its vicinity. Pre-application consultation should be carried out with Historic Scotland for any developments coming forward at this site.

Non Allocated Housing Site - Milnquarter Farm, High Bonnybridge (MIR Ref B&B/B/07)

Manor Forrest Ltd (00455/2003/002):- A site at Milnquarter Farm (RD4.4) (MIR reference B&B/B/07) should be allocated for housing development as an extension to the site at Broomhill Road (H12). Both the Milnquarter Farm and Broomhill Road sites are currently subject to an application for planning permission in principle (P/11/0142/PPP) for residential use.

The proposed development is a suitable infill opportunity within the urban limit and can meet the design principles set out in Policy D02. A financial contribution towards the cost of upgrading Antonine Primary school to accommodate any increase in pupils from the proposed development could be made. The development of the site is sustainable in terms of flooding, contamination, noise and available infrastructure.

The site's development would have no direct impact on the physical structure of the Antonine Wall World Heritage Site (WHS) and poses no threat to its status as a WHS. The site's development could affect the inter-relationship of the Milnquarter camp and the line of the Antonine Wall but it is considered that a sympathetically designed corridor within the development site would ensure that the inter-relationship would be maintained without detrimental impact, even though the visual corridor would be crossed by a distributor road. (RD4.5)

Falkirk Council has historically recognised the potential for development at Milnquarter Farm and the need to utilise the Broomhill Road site to gain access to the Milnquarter Farm site. The construction of a distributor road through the Broomhill Road and Milnquarter Farm sites would ameliorate traffic flows at Greenhill Road and represents the only option which could achieve this. (RD4.6)

The following documents have also been submitted in support of this representation: Outline Planning Application Decision Notice - Broomhill Road,

High Bonnybridge (RD4.1); PPP Decision Notice - Broomhill Road, High Bonnybridge (RD4.2); and Indicative Layout - Milnquarter Farm (RD4.3).

Non Allocated Housing Site - Broomhill Road 2, High Bonnybridge (MIR Ref B&B/B/12)

Broomside Properties (01156/2001/001):- A site at Broomhill Road, High Bonnybridge (RD4.8) (MIR reference B&B/B/12) should be allocated for housing development. There is likely to be inadequate provision at Bonnybridge to support local growth over the Plan period. The LDP provides for approximately 300 houses over the Plan period in Bonnybridge. With this level of provision, Bonnybridge is unlikely to be able to compete with other local settlements which will benefit from strategic growth. Proposal H12 (Broomhill Road) could be impacted by the need for park and ride facilities at the new Bonnybridge railway station; this would reduce the available housing options in Bonnybridge. Additional opportunities for housing development should not be anticipated through unpredictable windfalls but should be formally allocated on alternative sites which can be delivered.

Increasing the rate of development in Bonnybridge will be helpful in supporting the LDP Spatial Strategy in its ambition for sustainable settlements. Allocation of this site for housing would: be an obvious consolidation of the town; support a range of LDP policies, including those which seek to sustain existing local centres and promote economic development; and ensure that the case for the new railway station is as robust as possible.

Local infrastructure (roads, sewerage & water) has sufficient capacity to allow for further development in this location. Air quality and noise issues from nearby business and industrial premises are not expected due to the prevailing wind direction. There is no known flood risk. Developer contributions could be provided to offset any local school capacity issues. Provision of open space can be incorporated into the development to meet a known shortfall, consolidating the green space network in the vicinity of the site. The site boundary does not infringe upon the route of the Antonine Wall and as a result very limited impact would occur. Where the Antonine Wall route crosses Broomhill Road, the site has been set back by 50 metres to retain an open aspect which could be retained as open space. No significant impacts are expected on the surrounding landscape or the local built heritage.

Modifications sought by those submitting representations:

Allocated Housing Site H08 - Dennyloanhead

Bellway Homes Scotland (00482/2001/002):- Amend Proposal H08 (Dennyloanhead) to allow a first phase comprising 50-100 houses to come forward to assist in funding the Section 75 obligations attached to the site.

Mr Andrew MacBeath (01279/2001/001):- Delete Proposal H08 (Dennyloanhead).

Allocated Housing Site H12 - Broomhill Road, High Bonnybridge

St Josephs RC Parent Council (01084/2001/001):- Delete Proposal H12 (Broomhill Road).

Allocated Housing Site H13 - Seabegs Road, High Bonnybridge

Scottish Government (Historic Scotland) (00643/2001/005):- Amend Appendix 1 Site Schedule for Proposal H13 (Seabegs Road) to add a requirement for detailed heritage assessment to demonstrate the extent of its impact on the setting of the scheduled monument in its vicinity.

Allocated Mixed Use Site M03 - Banknock North

I and H Brown Limited (00609/2001/001):- Amend Proposal M03 (Banknock North) by increasing the housing capacity to 550 units or permitting a 10% flexibility allowance.

Allocated Mixed Use Site M15 - East Bonnybridge

National Grid C/o AMEC E & I UK Ltd (00583/2002/002):- Amend the comments section of Appendix 1 (Site Schedule) for Proposal M15 (East Bonnybridge) to make prospective developers aware of the constraints posed by the presence of the two high pressure gas pipelines which bisect the site.

Scottish Canals (00516/2001/003):- Amend site comments associated with Proposal M15 (East Bonnybridge) in Appendix 1 (Site Schedule) to highlight the opportunities to integrate development with the canal, for developer contributions to canal improvements, and facilities with potential for surface water discharge to be taken into the canal.

Scottish Government (Historic Scotland) (00643/2001/006):- Amend site comments associated with Proposal M15 in Appendix 1 (Site Schedule) to add requirement for detailed heritage assessment to demonstrate the extent of its impact on the setting of the scheduled monuments in its vicinity.

Non Allocated Housing Site - Milnquarter Farm, High Bonnybridge (MIR Ref B&B/B/07)

Manor Forrest Ltd (00455/2003/002):- Amend Proposal H12 (Broomhill Road) by extending the site to incorporate land at Milnquarter Farm. Amend Appendix 1 (Site Schedule) by: changing the site name to "Broomhill Road and Milnquarter Farm"; changing the site size to 9 ha; replacing the second bullet point in the site comments column with 'Planning permission in principle granted for part of the site'; and inserting an additional bullet point to read: 'Sensitive development to account for inter-visibility corridors of the Antonine Wall World Heritage Site'.

Non Allocated Housing Site - Broomhill Road 2, High Bonnybridge (MIR Ref B&B/B/12)

Broomside Properties (01156/2001/001):- Insert an additional site for housing at Broomhill Road, High Bonnybridge with a gross site area of 1.59 Hectares and capacity for 35-45 houses.

Summary of responses (including reasons) by planning authority:

As background to the Council's response on this issue, the general approach to the allocation of housing sites in Bonnybridge & Banknock is outlined in Appendix 2 of Technical Paper 3 (Revised): Housing Requirements and Provision (CD22, pages 20-21). An update to the existing housing land supply figures in Figure 3.1 of the Proposed LDP, informed by the 2012/2013 Housing Land Audit, has also been undertaken (CD23).

Allocated Housing Site H08 - Dennyloanhead

Bellway Homes Scotland (00482/2001/002):- Proposal H08 (Dennyloanhead) is an allocated housing site in the current Local Plan (CD10, page 106, site H.B&B07). It is being carried forward into the LDP. It is subject of a current planning application which has a 'minded to grant' decision from the Council, subject to the conclusion of a Section 75 obligation. Head of terms have been approved as part of this, but negotiation on the detail and phasing of requirements has yet to start. Bellway's assertion that development costs are constraining the start of development cannot yet be fully substantiated as the extent and phasing of Section 75 requirements is not yet confirmed.

It is acknowledged that the requirement to upgrade the M80/A803 sliproad junctions prior to the commencement of development, as set out in draft conditions 1 and 2 (CD49) is a significant burden on site H08. The applicant and lead developer of the site, Mactaggart & Mickel, is currently seeking to renegotiate these conditions, to allow a phase of development in advance of the required upgrading. It is this that is delaying progress on the development.

Recently undertaken traffic surveys have revealed that there has been a significant drop in background traffic levels along the A803 since the opening of the M80 extension in 2011 (CD50). The Council is currently in discussion with Transport Scotland to determine the amount of development which would be allowed to proceed in advance of the sliproad junctions being improved with a view to revising the above draft conditions. These discussions should be allowed to reach a conclusion before support is given in the LDP to a first phase of development.

Notwithstanding the above, it is not considered appropriate to indicate in the LDP which part of the site should be promoted as a first phase, as this is a matter for the masterplan, and agreement between Bellway Homes and Mactaggart & Mickel. It should be noted that a first phase of development on Bellway Homes' land utilising an existing access would not conform to the masterplan for the site which was approved as part of the application (CD48).

For these reasons, the Council does not agree to modify the plan in response to this representation.

Mr Andrew MacBeath (01279/2001/001):- Proposal H08 (Dennyloanhead) is an allocated housing site in the current Local Plan (CD10, page 106, site H.B&B07). It has already been fully assessed through the Local Plan process, and is being carried forward into the LDP. It is also subject of a current planning application, which has a 'minded to grant' decision from the Council.

The approved masterplan for the site (CD48) indicates that the woodland which forms the view from 21b Glasgow Road, Dennyloanhead, will be retained and expanded. Notwithstanding the fact that the right to a view is not enshrined by national or local planning policy, Mr MacBeath's woodland view will not be spoiled by the proposed development if it proceeds as currently envisaged. The valuable habitat this woodland provides will be enhanced rather than destroyed.

For these reasons, the Council does not agree to modify the plan in response to this representation.

Allocated Housing Site H12- Broomhill Road, High Bonnybridge

St Josephs RC Parent Council (01084/2001/001):- Proposal H12 (Broomhill Road) is an allocated housing site in the current Local Plan (CD10, page 106, site H.B&B08) and is being carried forward into the LDP. Outline planning permission (P/07/0069/OUT) was granted for the development of the land for housing in February 2008 and was renewed (P/11/0039/PPP) in November 2012.

Through the planning application process, the capacity of local infrastructure has been assessed and has been considered to be adequate to accommodate the scale of planned growth within the Bonnybridge area as detailed below.

Roads Infrastructure

The Council's Transport Planning Unit (TPU) commented in their consultation response (CD54) to the 2007 application that while there would be a reduction in the number of HGVs using Broomhill Road as a result of this development, there would be a shift in traffic movements from prior to the peak hour to during the peak hour, particularly in the morning. The TPU has since advised (CD141) that they would not have had any concerns about the increase in traffic at peak times (10 vehicle trips in the am peak and 11 vehicles in the pm peak) along Broomhill Road caused by the proposed development.

The report of handling for application reference P/11/0039/PPP (CD52) confirms that the Council's Roads Development Unit did not object to the planning application for housing development subject to conditions being applied to the decision notice.

Education Infrastructure

The report of handling for application reference P/11/0039/PPP (CD52) confirms that the Council's Education Services did not object to the planning application for housing development subject to the provision of a financial contribution towards the expansion of local schools.

Healthcare Infrastructure

The provision of primary and community healthcare facilities is the responsibility of NHS Forth Valley. Policy INF06 of the Proposed LDP (page 49) indicates that in locations where there is a deficiency in the provision of healthcare facilities identified by NHS Forth Valley, developer contributions will be sought to improve

the quantity and quality of such provision commensurate with the impact on new development. If the planning application for housing development at Broomhill Road needs to be renewed again, then this policy framework will allow the issue to be addressed at the time.

Water and Sewerage Infrastructure

The report of handling for application reference P/11/0039/PPP (CD52) confirms that Scottish Water did not object to the planning application for housing development.

For these reasons, the Council does not agree to modify the plan in response to this representation.

Allocated Housing Site H13 - Seabegs Road, High Bonnybridge

Scottish Government (Historic Scotland) (00643/2001/005):- The Seabegs Road site is a former Council depot which sits within an industrial estate. The Antonine Wall World Heritage Site (WHS) runs through the industrial estate. The boundary of site H13 has been drawn to exclude the WHS, but the WHS nonetheless abuts it at its southern end. A small area of the Wall to the south of the site is also scheduled (CD55).

The potential for the development of the Seabegs Road site to have significant negative effects on the historic environment is recognised in the Revised Environmental Report (CD17) as is, at Historic Scotland's request (CD61), its potential to have a positive impact. As a consequence, Appendix 1 (Site Schedule) of the Proposed LDP indicates that the site 'should be developed sensitively to avoid adverse effect on the setting of the Antonine Wall WHS and scheduled ancient monument' (page a1-02). In addition Policy D07 of the Proposed Plan states that the Council will seek to retain, protect, preserve and enhance the Antonine Wall, its associated archaeology, character and setting.

These provisions are considered adequate to ensure that the WHS is respected in future development. The Council does not believe it to be necessary to make reference to the requirement for a formal heritage assessment, as sought by Historic Scotland. However, if the Reporter is minded to recommend that the plan be amended in line with this representation, the Council would not take issue with this.

Allocated Mixed Use Site M03 - Banknock North

I and H Brown Limited (00609/2001/001):- Proposal M03 (Banknock North) is an allocated housing site in the current Local Plan (CD10, page 108, site H.B&B16). It is being carried forward into the LDP. It is the subject of a current planning application which has a 'minded to grant' decision from the Council, subject to the conclusion of a Section 75 obligation (P/10/0360/PPP).

Although the planning application was for 550 units, the 'minded to grant' decision is subject to a draft condition which limits the development to 504 units, unless agreed in writing with the planning authority. This was because this was the level of development assessed in the Transport Assessment. As indicated in the

relevant Planning Committee report (CD62, paragraphs 7a5 – 7a10), the Transport Assessments submitted to date demonstrate that even the development of the site for 504 units will cause traffic congestion issues on the local road network as not all of the junctions affected by the proposed development would operate at 'Practical Reserve Capacity' during peak hours.

Whilst it is acknowledged that recently undertaken traffic surveys have revealed that there has been a significant drop in background traffic levels along the A803 since the opening of the M80 extension in 2011 (CD50), it has not yet been demonstrated that this drop in background traffic would lead to a resolution of the traffic congestion issues caused by the proposed development for 504 units, or that this would release enough additional capacity on the local road network to enable the development of a further 46 units.

In the absence of evidence that 550 units can be accommodated without having an unacceptable adverse effect on the local road network, it is appropriate for the site capacity to be indicated as 504 in the LDP, consistent with the draft planning condition. For this reason, the Council does not agree to modify the plan in response to this representation.

Allocated Mixed Use Site M15 - East Bonnybridge

National Grid C/o AMEC E & I UK Ltd (00583/2002/002):- The Council acknowledges that gas transmission pipelines run through site M15 (East Bonnybridge), and that the health and safety constraints associated with these pipelines will have implications for the extent and layout of development. As a consequence, Appendix 1 (Site Schedule) of the Proposed Plan indicates that a masterplan is required which addresses the presence of pipelines through the site, and associated health and safety constraints (page a1-14).

The Council considers that this represents adequate reference to this constraint. However, if the Reporter is minded to recommend that the plan be amended in line with this representation, the Council would not take issue with the inclusion of additional wording.

Scottish Canals (00516/2001/003):- The Council acknowledges that site M15 is adjacent to, and has a relationship with, the Forth & Clyde Canal. The site comments in Appendix 1 (Site Schedule) of the Proposed LDP state that 'design and layout will have to address impact ... on the setting of the canal' and set out a requirement for 'extensive green network enhancement including access, landscape, and habitat improvements associated with ... the Forth & Clyde Canal' (page a1-14). In addition, Policy D14 (Canals), at sub-section (5), requires canal-side development in general to achieve high design standards, and to contribute to the canal's recreational amenity through the provision, where appropriate, of public access, amenity areas, moorings and slipways (page 68). The Council considers that this represents adequate reference to the opportunities for the site to contribute to, and integrate with, the Forth & Clyde Canal.

The Forth and Clyde Canal sits on an embankment above site M15. The discharge of surface water drainage to the Forth and Clyde Canal would not therefore be feasible without pumping. This is unlikely to be a sustainable approach.

For these reasons, the Council does not agree to modify the plan in response to this representation.

Scottish Government (Historic Scotland) (00643/2001/006):- Part of site H15 lies within the Buffer Zone of the Antonine Wall World Heritage Site, as shown on the Proposals Map. The Antonine Wall, which lies some 650m to the south of site H15, is also a scheduled monument at this point.

The potential for the development of the East Bonnybridge site to have significant negative effects on the historic environment is recognised in the Revised Environmental Report (CD17). As a consequence Appendix 1 (Site Schedule) of the Proposed LDP indicates that the site should be developed sensitively to avoid adverse effect on the setting of the Antonine Wall WHS. In addition Policy D07 of the Proposed Plan indicates that the Council will seek to retain, protect, preserve and enhance the Antonine Wall, its associated archaeology, character and setting. Policy D08 also offers protection to the setting of scheduled ancient monuments.

These provisions are considered adequate to ensure that the setting of the WHS is taken into account in future development. The Council does not believe it to be necessary to make reference to the requirement for a formal heritage assessment, as sought by Historic Scotland. However, if the Reporter is minded to recommend that the plan be amended in line with this representation, the Council would not take issue with this.

Non Allocated Site B&B/B/07- Milnquarter Farm, High Bonnybridge

Manor Forrest Ltd (00455/2003/002):- The Milnquarter Farm site lies within the Urban Limit in the current Local Plan and in the Proposed LDP. Notwithstanding this, the Council does not consider it to be an appropriate housing allocation. The site was subject to site assessment (CD21, site ref B&B/B/07) and was identified in the MIR as a non-preferred site. The site was also considered, and rejected, at the previous Falkirk Council Local Plan Inquiry in 2009 (CD12, page 104).

There is adequate provision in the Bonnybridge & Banknock area to support local growth over the plan period. Figure 3.1 of the Proposed LDP (page 10) shows that additional allocations amounting to 268 units have been made through the LDP to augment the existing supply of 1154 units (updated to 1043 units by the 2012/13 HLA) in the period 2014-24. There is therefore no need to allocate any additional housing land in the Bonnybridge & Banknock area to meet housing demand.

Notwithstanding the above, there are significant constraints to the development of the Milnquarter Farm site, as outlined in the site assessment, which suggest that allocating it as a site for housing development in the LDP would be inappropriate at this stage given the uncertainty over the site's effectiveness. These have been brought into focus by the planning application (reference P/11/0142/PPP) which was submitted in March 2011 by Manor Forrest for the development of the site for residential purposes. The application remains undetermined whilst the applicant supplies the necessary information to convince the Council that the development can proceed in accordance with policies set out in the Development Plan. The

current position on the most significant constraints to development are outlined below:

Impact on the Historic Environment

The site of this proposed development is adjacent to two scheduled monuments which form part of the Antonine Wall World Heritage Site (WHS), and the site itself lies within the WHS Buffer Zone. Any prospective development would therefore need to be particularly sensitive to the archaeology and the topographic setting of these features. Document CD55 illustrates the relationship between the proposed development site, the WHS and the scheduled ancient monuments

The site's location is important because it includes two sizeable re-alignments of the Wall, taking it from a scarp immediately above the valley floor of the Bonny to a higher ridge at Rough Castle. To the west the Wall was tactically positioned to block passage across the valley and its associated bogs, but eastward this was no longer tenable and the adjustment to the higher ground maintained a military advantage. This was rather awkwardly achieved by the re-entrant that utilised the small ridge south of the Antonine Primary School. The two sectors represent the work of different units of the Roman army and it was here that one of the work squads was based in the temporary camp. The camp is positioned to dominate the gap and its topographical relationship to the Wall is crucial. Indeed such clear views between a construction camp and a linear fortification at Milnquarter are unparalleled elsewhere within the WHS.

Historic Scotland, in their response to planning application P/11/0142/PPP (CD56), commented on the likely impact of the proposed development on the outstanding universal value (OUV) of the Frontiers of the Roman Empire (Antonine Wall) World Heritage Site (WHS) suggesting that the proposed development as indicated in the applicant's indicative layout (RD4.3) had the potential to adversely and significantly impact on the OUV of the WHS.

The response by the Council's Keeper of Archaeology (CD57) to planning application P/11/0142/PPP noted that the Cultural Heritage Assessment provided by the applicant (RD4.5) provides useful background information but, in evaluating the potential impact of the development, it did not set a high enough standard for a WHS and therefore the conclusions reached are not valid.

Education

The education capacity update to Technical Report 4 (CD25, paragraphs 6.10-6.11) indicates that primary school capacity is a key constraint to major new housing growth in the Bonnybridge area for the plan period. Development of this site in addition to other projected housing growth in the local area would require the extension of Antonine Primary School. Planning permission has already been granted (CD58) for the extension of Antonine Primary School to meet existing capacity pressures but a further extension would be needed to accommodate housing growth at Milnquarter Farm. The site of the school is affected by a scheduled section of the Antonine Wall WHS. Whilst it was possible for the consented extension to take place without having an adverse impact on the WHS, its setting, or its component scheduled areas (as evidenced in Historic Scotland's response to the planning application for the consented school extension (CD59),

no assessment of the impact of a further extension has been undertaken. In their response to the planning application at Milnquarter Farm the Council's Education Service have commented that it would not be possible to extend Antonine Primary and Nursery any further to accommodate this proposed development due to the small core capacity of the school and physical and environmental constraints of the school grounds (CD63).

Flood Risk

The site is located within an area which is identified on SEPA's Indicative Flood Map as being at high risk of flooding (CD60). A flood risk assessment has been submitted as part of the current planning application, but it has yet to be demonstrated to the satisfaction of the Council that the development of the site could take place without new residents within the development site being at high risk of flooding or exacerbating flood risk elsewhere.

Impact on the Milnquarter Site of Importance for Nature Conservation (SINC)

If development were to proceed at Milnquarter Farm in the manner envisaged in the applicant's indicative plan (RD4.3) then this would cause the complete destruction of approximately 1.15ha (34%) of the 3.4ha Milnquarter SINC. In practice the effect of boundary displacement will significantly reduce the quality of the remaining 66% of the SINC.

With such a wide range of significant constraints to development affecting the site still to be overcome, it is considered that the status of the site within the Proposed Plan i.e. as unallocated white land within the Urban Limit, is entirely appropriate. For these reasons, the Council does not agree to modify the plan in response to this representation.

Non Allocated Site - Broomhill Road 2, High Bonnybridge (MIR Ref B&B/B/12)

Broomside Properties (01156/2001/001):- The Council does not consider the Broomhill Road 2 site to be an appropriate housing allocation. The site was first promoted by Broomside Properties in response to the MIR consultation, and has been subject to site assessment (CD21, site ref B&B/B/12).

There is adequate provision in the Bonnybridge & Banknock area to support local growth over the plan period. Figure 3.1 of the Proposed LDP (page 10) shows that additional allocations amounting to 268 units have been made through the LDP to augment the existing supply of 1154 units (updated to 1043 units by the 2012/13 HLA) in the period 2014-24. There is therefore no need to allocate any additional housing land in the Bonnybridge & Banknock area to meet housing demand.

As highlighted in the site assessment, part of the site lies within the Antonine Wall WHS and the remainder is in the WHS buffer zone. The Council's keeper of archaeology has commented that the proposed development would completely destroy the landscape setting of the WHS by radically altering the local topography of low rolling hills and blocking any views to the north (CD53). The proposed development would therefore have an adverse impact on the setting of

the WHS.

The education capacity update to Technical Report 4 (CD25, paragraphs 6.10-6.11) indicates that primary school capacity is a key constraint to major new housing growth in the Bonnybridge area for the plan period. Development of this site in addition to other projected housing growth in the local area would require the extension of Antonine Primary School. Planning permission has already been granted (CD58) for the extension of the school to meet existing capacity pressures but a further extension would be needed to accommodate housing growth at Broomhill Road 2. The site of the school is affected by a scheduled section of the Antonine Wall WHS. Whilst it was possible for the consented extension to take place without having an adverse impact on the WHS, its setting, or its component scheduled areas (as evidenced in Historic Scotland's response to the planning application for the consented school extension (CD59)), no assessment of the impact of a further extension has been undertaken. In their response to the planning application at Milnquarter Farm the Council's Education Service have commented that it would not be possible to extend Antonine Primary and Nursery any further to accommodate this proposed development due to the small core capacity of the school and physical and environmental constraints of the school grounds (CD63). These comments could equally apply to development at Broomhill Road 2.

For these reasons, the Council does not agree to modify the plan in response to this representation.

Reporter's conclusions:

Reporter's recommendations: