

Issue 28	Flooding & the Water Environment	
Development plan reference:	<p><u>Chapter 5 – Supporting Policies</u> Policy RW06 Flooding (pages 73-74) <u>Appendix 1 – Site Schedules</u> Economic Development – Polmont Area (page a1-18) Green Network – John Muir Trail (page a1-23) Green Network – Forth Estuary (page a1-23) Green Network – Upper Carron/Lower Carron (page a1-24) Green Network – Avon (page a1-25) Housing – Falkirk (page a1-04) Housing – Larbert & Stenhousemuir (page a1-05) Housing – Rural South – Avonbridge (page a1-08) Housing – Rural South – Limerigg (page a1-09) Housing – Rural South – Standburn (page a1-10) Mixed Use – Bonnybridge and Banknock (page a1-12) Mixed Use – Grangemouth (page a1-14) <u>Appendix 2 – Strategic Growth Areas</u> Banknock (page a2-03) Falkirk North (page a2-07)</p>	Reporter:
Body or person(s) submitting a representation raising the issue (including reference number):		
RSPB Scotland (00648) SEPA (00968)		
Provision of the development plan to which the issue relates:	Policies on flooding and the water environment, and the provision made for these issues in relation to specific sites in the LDP.	
Planning authority's summary of the representation(s):		
<p><u>Policy RW06 – Flooding</u></p> <p>RSPB Scotland (00648/2001/010):- Policy RW06 should indicate that measures to facilitate sustainable flood management in keeping with the Local Flood Risk Management Plan will be supported.</p> <p>SEPA (00968/2001/012):- Policy RW06 should more closely match the principles</p>		

set out in SEPA's: Land Use Vulnerability Guidance; and Technical Guidance for Flood Risk Assessments.

Allocated Economic Development Site ED23 – Gilston

SEPA (00968/2001/016):- Objection is made to Proposal ED23. The site comments note that a Flood Risk Assessment (FRA) may be required due to the presence of the Gilston Burn. However, the objector's preference would be for this to be an explicit requirement. Comments should make it clear to developers that flood risk is an issue that needs to be taken into consideration and that a flood risk assessment will be required to inform the scale, layout and form of development.

Allocated Green Network Opportunity GN01 – John Muir Trail

SEPA (00968/2001/027):- Objection is made to Opportunity GN01. This path borders the Middle Forth Estuary which the Forth Area River Basin Management Plan identifies as downgraded for morphology (due to realignment for flood defence). The path improvement project could potentially deliver shoreline habitat improvements, through water body restoration, to contribute towards the achievement of River Basin Management Plan (RBMP) objectives.

Allocated Green Network Opportunity GN02 – Kinneil Kerse

SEPA (00968/2001/028):- Objection is made to Opportunity GN02. This opportunity borders the Middle Forth Estuary which the Forth Area River Basin Management Plan identifies as downgraded for morphology (due to realignment for flood defence). This habitat enhancement opportunity could potentially deliver shoreline habitat improvements, through water body restoration, to contribute towards the achievement of RBMP objectives.

Allocated Green Network Opportunity GN03 – Bothkennar/Skinflats

SEPA (00968/2001/029):- Objection is made to Opportunity GN03. This opportunity borders the Middle Forth Estuary which the Forth Area River Basin Management Plan identifies as downgraded for morphology (due to realignment for flood defence). This habitat enhancement opportunity could potentially deliver shoreline habitat improvements, through water body restoration, to contribute towards the achievement of RBMP objectives.

Allocated Green Network Opportunity GN04 – Kincardine – South Alloa

SEPA (00968/2001/024):- Objection is made to Opportunity GN04. This path borders the Middle Forth Estuary which the Forth Area River Basin Management Plan identifies as downgraded for morphology (due to realignment for flood defence). The path improvement project could potentially deliver shoreline habitat improvements, through water body restoration, to contribute towards the achievement of RBMP objectives.

Allocated Green Network Opportunity GN08 – River Carron Corridor Improvements

SEPA (00968/2001/031):- Objection is made to Opportunity GN08. Any works in

the SPA must not cause any impact in terms of the Water Framework Directive.

Allocated Green Network Opportunity GN26 – River Avon Corridor

SEPA (00968/2001/032):- Objection is made to Opportunity GN26. Recent hydromorphological surveys have revealed that the three main stem River Avon water bodies are all under pressure from morphological changes. Opportunities for riparian habitat improvement along the entire length of the River Avon should be investigated.

Allocated Housing Site H26 – Etna Road 2

SEPA (00968/2001/017):- Objection is made to Proposal H26. There may be an opportunity to restore the channelized Ladysmill Burn along the eastern boundary of this site to potentially enhance the water environment. Developers should be encouraged to consider this as part of the site proposals by including a feasibility study to assess the potential for channel restoration as a site requirement. This is in keeping with the Council's duties as a responsible authority under The Water Environment and Water Services (Scotland) Act 2003.

Allocated Housing Site H31 – Glenburn Road, Hallglen

SEPA (00968/2001/019):- Objection is made to Proposal H31. The southern perimeter of the site is encroaching upon the Glen Burn flood extent. As such, part of the site may not be suitable for development. A Flood Risk Assessment is required to assess flood risk.

Allocated Housing Site H36 – Bellsdyke

SEPA (00968/2001/020):- Objection is made to Proposal H36. This site is located in or adjacent to the functional flood plain or an area of known flood risk. A Flood Risk Assessment is required to assess the flood risk from the small watercourse which runs through the site. This should also consider any culverts within the site.

The receiving watercourse has been identified as sensitive and as such has limited capacity to dilute surface water run-off from the development. High quality SUDS is therefore required. This is in keeping with the Council's duties as a responsible authority under The Water and Environment and Water Services (Scotland) Act 2003.

Allocated Housing Site H37 – Hill of Kinnaird

SEPA (00968/2001/021):- Objection is made to Proposal H37. This site is located in or adjacent to the functional flood plain or an area of known flood risk. A Flood Risk Assessment is required to assess the flood risk from the small watercourse which runs through the site. This should also consider the pond within the site and any culverts adjacent to the site.

The receiving watercourse has been identified as sensitive and as such has limited capacity to dilute surface water run-off from the development. High quality SUDS is therefore required.

A watercourse runs through the centre of the site. A buffer strip along the watercourse which will help protect and improve the water environment should be required.

Allocated Housing Site H61 – Bridgehill, Avonbridge

SEPA (00968/2001/022):- Objection is made to Proposal H61. This site is likely to be heavily constrained due to flood risk with a large proportion of the site unsuitable for development. This site is likely to provide important flood storage to Avonbridge and a FRA is required to determine the area of floodplain to be safeguarded. This will also ensure the provision of a buffer strip along the watercourse.

Allocated Housing Site H67 – Slamannan Road 2, Limerigg

SEPA (00968/2001/023):- Objection is made to Proposal H67. This site is located in or adjacent to the functional flood plain or an area of known flood risk. A FRA is required to assess the flood risk from the small watercourse which runs along the southern perimeter of the site. Provision of a buffer strip along the watercourse would help to protect and improve the water environment.

Allocated Housing Site H73 – Standburn West

SEPA (00968/2001/024):- Objection is made to Proposal H73. This site is located in an area at risk of flooding from the Bowhouse Burn. A FRA is required which assesses the flood risk from the Bowhouse Burn and any upstream and downstream culverts.

Allocated Mixed Use Site M03 – Banknock North

SEPA (00968/2001/025):- Objection is made to Proposal M03. This site is located in an area at risk of flooding from the Doups Burn which flows through the south west corner of site. There is historical flooding on Kilsyth Road from the Doups Burn in 2007 and from the Lairds Pond onto the adjacent road in 2008. A flood risk assessment should be required. The provision of a buffer strip along the Doups Burn will also help to protect and improve the water environment.

Allocated Mixed Use Site M12 – Grangemouth Town Centre

SEPA (00968/2001/026):- Objection is made to Proposal M12. This site is located in an area at risk of flooding from coastal, fluvial and pluvial sources. The site will likely be constrained due to flood risk and it is therefore advised that development may be limited to non-residential use. A FRA is required.

Modifications sought by those submitting representations:

Policy RW06 – Flooding

RSPB Scotland (00648/2001/010):- Amend Policy RW06 to include reference to support for measures to facilitate sustainable flood management, in keeping with the Local Flood Risk Management Plan.

SEPA (00968/2001/012):- Amend Policy RW06 by changing the second sentence in sub-section (1) to read: 'In areas where there is significant risk of flooding from any source (up to and including a 0.5% [1:200 year] flood event) development proposals will be assessed against advice and the flood risk framework in SPP'; and deleting the third bullet point in sub-section (1).

Allocated Economic Development Site ED23 – Gilston

SEPA (00968/2001/016):- Amend the site comments of Proposal ED23 as expressed in Appendix 1 (Site Schedule) by deleting the 5th bullet point and replacing with: 'A flood risk assessment will be required to inform the scale, layout and form of development due to the presence of the Gilston Burn and other small watercourses and ponds located within the site.'

Allocated Green Network Opportunity GN01 – John Muir Trail

SEPA (00968/2001/027):- Amend the description and comments of Opportunity GN01 as expressed in Appendix 1 by adding an additional bullet point to read: 'The potential for path improvement works to incorporate shoreline habitat improvements which contribute towards the achievement of River Basin Management Plan (RBMP) objectives should be investigated.'

Allocated Green Network Opportunity GN02 – Kinneil Kerse

SEPA (00968/2001/028):- Amend the description and comments of Opportunity GN02 as expressed in Appendix 1 by adding an additional bullet point to read: 'The potential for habitat enhancement works to incorporate shoreline habitat improvements which contribute towards the achievement of River Basin Management Plan (RBMP) objectives should be investigated.'

Allocated Green Network Opportunity GN03 – Bothkennar/Skinflats

SEPA (00968/2001/029):- Amend the description and comments of Opportunity GN03 as expressed in Appendix 1 by modifying the text in bullet point 3 to read: 'Creation of new supporting habitat could involve the managed realignment of the coast which would help to reduce overall flood risk in the area and contribute to the achievement of river basin management planning objectives.'

Allocated Green Network Opportunity GN04 – Kincardine – South Alloa

SEPA (00968/2001/030):- Amend the description and comments of Opportunity GN04 as expressed in Appendix 1 by adding an additional bullet point to read: 'The potential for path improvement works to incorporate shoreline habitat improvements which contribute towards the achievement of River Basin Management Plan (RBMP) objectives should be investigated.'

Allocated Green Network Opportunity GN08 – River Carron Corridor Improvements

SEPA (00968/2001/031):- Amend the description and comments of Opportunity GN08 as expressed in Appendix 1 by adding an additional bullet point to read: 'Any works in the Firth of Forth SPA must not cause any impact in terms of the

Water Framework Directive’.

Allocated Green Network Opportunity GN26 – River Avon Corridor

SEPA (00968/2001/032):- Amend the description and comments of Opportunity GN26 as expressed in Appendix 1 by adding an additional bullet point to read: 'Opportunities for riparian habitat improvement should be investigated and promoted.'

Allocated Housing Site H26 – Etna Road 2

SEPA (00968/2001/017):- Amend Proposal H26 as expressed in Appendix 2 (Strategic Growth Area Guidance) by adding an additional bullet point to the Land Use/Design/Placemaking/Green Network section as follows: 'Feasibility study required to assess the potential for channel restoration of the Ladysmill Burn along the eastern boundary of the site.'

Allocated Housing Site H31 – Glenburn Road, Hallglen

SEPA (00968/2001/019):- Amend the site comments of Proposal H31 as expressed in Appendix 1 by adding an additional bullet point to read: 'A flood risk assessment will be required to inform the scale, layout and form of development due to the presence of the Glen Burn.'

Allocated Housing Site H36 – Bellsdyke

SEPA (00968/2001/020):- Amend Proposal H36 as expressed in Appendix 2 (Strategic Growth Area Guidance) by adding additional bullet points to the 'Constraints' section to read: 'A flood risk assessment will be required which should also consider any culverts within the site at Bellsdyke to inform the scale, layout and form of development due to the presence of a small watercourse which runs through the site.'; and 'High quality SUDS required as the receiving watercourse has been identified as sensitive. In practice this means that at least two levels of SUDS treatment will be required.'

Allocated Housing Site H37 – Hill of Kinnaird

SEPA (00968/2001/021):- Amend Proposal H37 as expressed in Appendix 2 (Strategic Growth Area Guidance) by adding additional bullet points to the 'Constraints' section to read: 'A flood risk assessment will be required which should also consider flood risk from the small pond within the site and any culverts adjacent to the site at Hill of Kinnaird to inform the scale, layout and form of development.'; and 'High quality SUDS required as the receiving watercourse has been identified as sensitive. In practice this means that at least two levels of SUDS treatment will be required.' and by adding an additional bullet point to the 'Land Use/Design/Placemaking/Green Network' section to read: 'A buffer strip along the watercourse which runs through the centre of the Hill of Kinnaird site is required.'

Allocated Housing Site H61 – Bridgehill, Avonbridge

SEPA (00968/2001/022):- Amend the site comments of Proposal H61 as

expressed in Appendix 1 by replacing bullet point 2 with the following text:
'Developable area restricted due to flood risk which requires to be assessed. No built development should take place on the functional flood plain or within an area of known flood risk.'

Allocated Housing Site H67 – Slamannan Road 2, Limerigg

SEPA (00968/2001/023):- Amend the site comments of Proposal H67 as expressed in Appendix 1 by adding additional bullet points to read: 'A flood risk assessment will be required to inform the scale, layout and form of development due to the presence a small watercourse running along the southern boundary of the site.'; and 'a buffer strip along the small watercourse running along the southern boundary of the site should be provided.'

Allocated Housing Site H73 – Standburn West

SEPA (00968/2001/024):- Amend the site comments of Proposal H73 as expressed in Appendix 1 by adding an additional bullet point to read: 'A flood risk assessment will be required to inform the scale, layout and form of development due to the presence of the Bowhouse Burn and upstream and downstream culverts. No built development should take place on the functional flood plain or within an area of known flood risk.'

Allocated Mixed Use Site M03 – Banknock North

SEPA (00968/2001/025):- Amend Proposal M03 as expressed in Appendix 2 (Strategic Growth Area Guidance) by adding an additional bullet points to the 'Constraints' section to read: 'Development to avoid areas at high risk of flooding from the Doups Burn and the Laird's Pond, as informed by flood risk assessment; potential to incorporate 6m buffer strip.'

Allocated Mixed Use Site M12 – Grangemouth Town Centre

SEPA (00968/2001/026):- Amend the site comments of Proposal M12 as expressed in Appendix 1 by adding an additional bullet point to read: 'A flood risk assessment will be required to inform the scale, layout and form of development due to potential flood risk from coastal, fluvial and pluvial sources. No built development should take place on the functional flood plain or within an area of known flood risk. Any development may be limited to non-residential use due to risk of flooding.'

Summary of responses (including reasons) by planning authority:

Policy RW06 – Flooding

RSPB Scotland (00648/2001/010):- The Local Flood Risk Management Plan has not yet been produced so it is not possible to predict which sustainable flood management measures it will promote. It is considered premature to indicate blanket support for measures which have not yet been properly detailed.

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

SEPA (00968/2001/012):- 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 amended wording.

Allocated Economic Development Site ED23 – Gilston

SEPA (00968/2001/016):- Given that Appendix 1 of the Proposed Plan already indicates that a flood risk assessment may be required, the Council do not believe it is necessary to add the detail to the site requirements requested by SEPA to mitigate potential flood risk. Nonetheless, 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 amended wording.

Allocated Green Network Opportunity GN01 – John Muir Trail

SEPA (00968/2001/027):- Whilst it is accepted that, in theory, water body restoration opportunities could be investigated along the line of the John Muir Trail, it is unclear what benefit this would actually have, or whether it would contribute significantly towards the achievement of RBMP objectives. The most significant morphological alterations along the Middle Forth Estuary occur at the Port of Grangemouth which has seen significant areas of land reclaimed from the estuary since the founding of Grangemouth in 1768. Without tackling these substantial morphological alterations at Grangemouth, it seems unlikely that incremental water body restoration opportunities, such as the ones suggested along the line of the John Muir Trail, would achieve RBMP objectives for the Middle Forth Estuary.

The John Muir Trail follows the line of the coast between its emergence from Shore Wood east of Blackness in West Lothian to Kinneil Local Nature Reserve to the west of Bo'ness. Along this coastal section, path improvement works are only planned along the Blackness to Bo'ness section. The opening of the John Muir Trail is planned to coincide with the 100th anniversary of John Muir's death in 2014.

Foremost amongst the considerations when selecting a route for the John Muir Trail through the Council area were the practicalities of delivering a route in time for the opening of the John Muir Trail. Clearly investigating opportunities for water body restoration along this stretch of the coast would take a considerable period of time as would securing the land necessary to carry out water body restoration. It is not considered to be practical to achieve this in advance of the project opening.

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

Allocated Green Network Opportunity GN02 – Kinneil Kerse

SEPA (00968/2001/028):- Whilst it is accepted that water body restoration opportunities could be investigated at Kinneil Kerse, it is unclear what benefit this would actually have, or whether it would contribute significantly towards the achievement of RBMP objectives. The most significant morphological alterations

along the Middle Forth Estuary occur at the Port of Grangemouth which has seen significant areas of land reclaimed from the estuary since the founding of Grangemouth in 1768. Without tackling these substantial morphological alterations at Grangemouth, it seems unlikely that incremental water body restoration opportunities, such as the one suggested at Kinneil Kerse, would achieve RBMP objectives for the Middle Forth Estuary.

Kinneil Kerse is a former landfill site. Any opportunities for water body restoration would need to be mindful of the need to relocate historic landfill to facilitate them and also the need to ensure that any hazardous waste did not end up being released into the wider environment. It is considered to be premature therefore to indicate that water body restoration would be appropriate at this site before any evidence has been submitted to detail what might be feasible or what benefit this might have.

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

Allocated Green Network Opportunity GN04 – Kincardine – South Alloa

SEPA (00968/2001/024):- Whilst it is accepted that water body restoration opportunities could be investigated at Kincardine – South Alloa, it is unclear what benefit this would actually have, or whether it would contribute significantly towards the achievement of RBMP objectives. The most significant morphological alterations along the Middle Forth Estuary occur at the Port of Grangemouth which has seen significant areas of land reclaimed from the estuary since the founding of Grangemouth in 1768. Without tackling these substantial morphological alterations at Grangemouth, it seems unlikely that incremental water body restoration opportunities, such as the one suggested at Kincardine – South Alloa, would achieve RBMP objectives for the Middle Forth Estuary.

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

Allocated Green Network Opportunity GN08 – River Carron Corridor Improvements

SEPA (00968/2001/031):- Policy RW05 of the Proposed Plan states at sub-section (3) that there will be a general presumption against development which would have a detrimental effect on the integrity and water quality of aquatic and riparian ecosystems or which would lead to deterioration of the ecological status of any element of the water environment.

Given this policy framework, the Council does not believe it is necessary to add the detail to the site requirements requested by SEPA to mitigate potential impacts in terms of the Water Framework Directive. Nonetheless, 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 amended wording.

Allocated Green Network Opportunity GN26 – River Avon Corridor

SEPA (00968/2001/032):- Highlighting the need for an investigation of

opportunities for riparian habitat improvement along the River Avon is not considered to be the function of the LDP. Section 5.7 of Falkirk Greenspace: A Strategy for our Green Network (CD138) indicates that the Council will work with CSGN, landowners and angling groups to explore options for riparian planting, woodland creation and management, habitat enhancement, invasive species control and access improvements as part of river restoration projects.

Should significant riparian habitat improvement opportunities be identified as part of this process then they can be added as a green network opportunity in the next iteration of the LDP.

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

Allocated Housing Site H26 – Etna Road 2

SEPA (00968/2001/017):- The opportunity for the development of the site to have a positive effect on the water environment by restoring the channelized Ladysmill Burn along the eastern boundary of this site was recognised in Appendix 2 of the revised Environmental Report (CD17). However, as explained in Appendix 7 of the revised Environmental Report, in general, measures to minimise non significant negative environmental effects and ensure non significant positive environmental effects were not incorporated into the proposed LDP. This is because of the high level nature of the LDP and the need to keep the document as concise as possible.

Policy RW05 of the Proposed Plan already indicates that opportunities to improve the water environment by restoring the natural course of watercourses should be exploited where possible.

The Council does not believe it is necessary to add the detail to the site requirements requested by the objector to realise opportunities to restore the channelized Ladysmill Burn. Nonetheless, 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 amended wording.

Allocated Housing Site H31 – Glenburn Road, Hallglen

SEPA (00968/2001/019):- Detailed planning permission has already been granted for the development of this site. The Housing Land Audit anticipates that the site will be developed in 2014-15.

Policy RW06 of the Proposed Plan indicates that development proposals on land identified at being risk of flooding will be required to provide a flood risk assessment so any future planning application for the site will need to be accompanied by a flood risk assessment.

The Council does not believe it is necessary to add the detail to the site requirements requested by the objector to mitigate flood risk. Nonetheless, 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 amended wording.

Allocated Housing Site H36 – Bellsdyke

SEPA (00968/2001/020):- Detailed planning permission has already been granted for the development of this site and construction is underway. The Housing Land Audit anticipates that development of the site will be completed by 2017/18.

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

Allocated Housing Site H37 – Hill of Kinnaird

SEPA (00968/2001/021):- Appendix 1 of the Proposed Plan (page a1-05) indicates that outline planning permission has already been granted for the development of this site, a planning brief for the site's development has been approved and a site masterplan is in place. Any future detailed planning application would need to conform to the terms of the outline planning permission and be in accordance with the approved planning brief and site masterplan. Appendix 2 of the proposed LDP indicates that the masterplan for Hill of Kinnaird may require revision if the infrastructure layout, housing mix or configuration of the business park is revised.

Policy RW05 indicates that, where appropriate, development proposals adjacent to a water body should provide for a substantial undeveloped and suitably landscaped riparian corridor so any future planning application which proposes a revision to the approved masterplan will need to ensure that the watercourse running through the centre of the site is suitably buffered if this is considered to be appropriate.

Policy INF12 indicates that surface water management for new development should comply with current best practice on sustainable urban drainage so any future planning application will need to comply with current best practice, and provide high quality SUDS.

Policy RW06 of the Proposed Plan indicates that development proposals on land identified at being risk of flooding will be required to provide a flood risk assessment so any future planning application for the site which proposes a revision to the approved masterplan will need to be accompanied by a revised flood risk assessment.

The Council does not believe it is necessary to add the detail to the site requirements requested by SEPA to: mitigate flood risk; ensure the provision of high quality SUDS; or ensure on site watercourses are suitably buffered. Nonetheless, 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 amended wording.

Allocated Housing Site H61 – Bridgehill, Avonbridge

SEPA (00968/2001/022):- The issue of flood risk is well known at this site. Appendix 1 of the proposed LDP indicates that the developable area is restricted due to flood risk and that this requires to be assessed (page a1-08)

Policy RW05 of the Proposed Plan indicates that where appropriate, development proposals adjacent to a water body should provide for a substantial undeveloped and suitably landscaped riparian corridor so any future planning application will need to ensure that the River Avon is suitably buffered.

The Council does not believe it is necessary to add the detail to the site requirements requested by SEPA to: mitigate flood risk; or ensure on site watercourses are suitably buffered. Nonetheless, 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 amended wording. This is not regarded as a notifiable modification.

Allocated Housing Site H67 – Slamannan Road 2, Limerigg

SEPA (00968/2001/023):- Policy RW06 indicates that development proposals on land identified at being risk of flooding will be required to provide a flood risk assessment so any future planning application for the site will need to be accompanied by a flood risk assessment.

Policy RW05 of the Proposed Plan indicates that where appropriate, development proposals adjacent to a water body should provide for a substantial undeveloped and suitably landscaped riparian corridor, so any future planning application will need to ensure that the small watercourse which runs along the southern perimeter of the site is suitably buffered.

The Council does not believe it is necessary to add the detail to the site requirements requested by SEPA to: mitigate flood risk; or ensure on site watercourses are suitably buffered. Nonetheless, 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 amended wording.

Allocated Housing Site H73 – Standburn West

SEPA (00968/2001/024):- Appendix 1 (page a1-10) of the proposed LDP indicates that an approved SPG for the development of the site already sets out requirements in relation to flood risk (CD136). Additionally, Policy RW06 indicates that development proposals on land identified at being risk of flooding will be required to provide a flood risk assessment. In order to comply with the SPG (CD136) and Policy RW06, any planning application for the development of the site will need to be accompanied by a flood risk assessment.

The Council does not believe it is necessary to add the detail to the site requirements requested by SEPA to mitigate flood risk, nonetheless, 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 amended wording.

Allocated Mixed Use Site M03 – Banknock North

SEPA (00968/2001/025):- The issue of flood risk on the Banknock North site is well known. A flood risk assessment was undertaken to inform the Banknock and Haggis SIRR Development Framework SPG and this was updated to inform the

approved masterplan for development at Banknock North (CD110). Indeed the 1 in 200 year flood extent is shown on the approved masterplan.

The indicative concept plan of the Banknock and Higgs SIRR Development Framework (CD137) and the approved masterplan for development at Banknock North already make provision for an undeveloped buffer strip along the Doups Burn.

Policy RW05 indicates that where appropriate, development proposals adjacent to a water body should provide for a substantial undeveloped and suitably landscaped riparian corridor so any future planning application which proposes a revision to the approved masterplan or departs from the Development Framework's indicative concept plan will need to ensure that the Doups Burn is suitably buffered.

Policy RW06 indicates that development proposals on land identified at being risk of flooding will be required to provide a flood risk assessment so any future planning application for the site which proposes a revision to the approved masterplan or departs from the Development Framework's indicative concept plan will need to be accompanied by a revised flood risk assessment.

The Council does not believe it is necessary to add the detail to the site requirements requested by the objector to: mitigate flood risk; or ensure on site watercourses are suitably buffered. Nonetheless, 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 amended wording.

Allocated Mixed Use Site M12 – Grangemouth Town Centre

SEPA (00968/2001/026):- Policy RW06 indicates that development proposals on land identified at being risk of flooding will be required to provide a flood risk assessment so any future planning application for the site will need to be accompanied by a flood risk assessment.

The Council does not believe it is necessary to add the detail to the site requirements requested by SEPA to mitigate flood risk. Nonetheless, 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 amended wording.

Reporter's conclusions:

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Reporter's recommendations:

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