

00835 Agnew Mark

Comments: 7

Vision

The Vision lacks a suitable level of specification against which the overall success of the plan can be readily assessed, and should make reference to 'development targets' such as house completion targets. As the pursuit of a medium growth scenario lacks ambition and will not create the right balance of opportunities to allow the Council area to prosper, the high growth scenario should be pursued.

Council response: The Proposed Plan contains very specific housing targets and a monitoring framework. The housing target is an ambitious one given the current low level of housebuilding and uncertain market conditions for the foreseeable future.

Main Issue 1: Housing Growth

The plan should aim for a higher and more ambitious housing growth level. A key component in the overall recovery of the housing market will be ready access to a sufficient level of unconstrained sites. Pursuing a 'high growth' scenario would not result in the need for major growth areas, and promotion of a wide range of small to medium sites could be successfully integrated into existing communities.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing Locations

Additional housing required to support the high growth scenario should be split on a proportional basis across the list of settlements detailed in Figure 3.4 of the MIR.

Council response: The high growth option is not supported, and would be not be in line with the most recent household projections on which the Proposed Plan is based.

Main Issue 3: Housing Need

The adoption of a flexible and realistic approach to the provision of affordable housing is key to development viability, and the Council should pay full regard to the Chief Planner's letter of 15 March 2011 when finalising policy.

Council response: SG supporting Proposed Plan policy HSG Affordable Housing adopts a flexible approach to provision.

Main Issue 4: Infrastructure for Growth

Specific reference to the policy tests of Circular 1/2010 should be made in bringing forward policy on developer contributions.

Council response: Proposed Plan policy INF2 and related SG concerned with developer contributions highlight need for S75s to comply with the provisions of Circular 3/2012.

SHIE/B Shieldhill Potential New Sites

The allocation of the site at Hillcrest Farm, Shieldhill (SHIE/B/02) is supported, but it is noted that the boundary shown in previous submission was inaccurate.

Council response: The boundary has been amended in line with the original submission.

SHIE/B Shieldhill Potential New Sites

242 standard letters submitted expressing support for the allocation of the Hillcrest site (SHIE/B/02). The site would be a modest eastern expansion to Shieldhill, in an area where a precedent for housing has already been established. Shieldhill and Reddingmuirhead would benefit from the housing, there would be no adverse impact on the existing houses, and the local school can cope with the additional children.

Council response: The site has been identified as a housing proposal in the Proposed Plan.

00840 Airth Resident

Comments: 1

Main Issue 2: Sustainable Housing Locations

Airth resident believes housing growth in Airth should be limited to consolidating existing commitments and gap sites, which alone account for 160 units. Airth has significant infrastructure and environmental constraints which make it difficult to support further housing growth. Catchment schools are at capacity, drainage is restricted and existing traffic and parking problems would be exacerbated by more housing. Further growth will lead to loss of identity and community fragmentation.

Council response: The Proposed Plan supports modest growth in Rural North, in line with the MIR. Section 5 of Technical Report 3 provides the rationale for the level of growth considered suitable and the choice of sites in each of the settlement areas. In Rural North the focus of growth remains the existing sites at Airth, augmented by an additional site at the north end of the village, and existing sites at Torwood. The modest growth strategy takes account of environmental and infrastructure constraints across the area, in particular noting that waste water infrastructure improvements are programmed by Scottish Water and capacity pressures at Airth primary school have eased.

00892 Alex and Mae Ritchie

Comments: 1

MUR/B Muirhouses Potential New Sites

Objection is made to the proposed development at Muirhouses (MUR/B/02) on the basis of loss of further greenfield sites, the traffic situation in Muirhouses which will be made worse, and the impact on trees on the east side of Carriden Brae.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. Further assessment suggests that there will be substantial impacts on trees and hedgerows which would have an adverse impact on the setting of the village and Carriden Estate. Public consultation has raised concerns about traffic issues on Carriden Brae.

00860 **Allison Wilf**

Comments: 7

Vision

The preferred vision is considered to be over-optimistic and based on trends during growth period. Housing requirements are likely to reduce during the Plan period. The focus for housing should be on the regeneration of empty homes and brownfield sites which represents a more sustainable form of development and which would strengthen existing communities. Preference is for the second alternative vision to retain the 'status quo'.

Council response: The housing target for the Proposed Plan has been scaled back from that in the MIR in the light of revised household projections. There is a strong focus on the redevelopment of brownfield land, although a number of greenfield sites are included to ensure flexibility and choice in the supply. SPP emphasises the need to provide a generous supply of land for housing.

Main Issue 1: Housing Growth

The preferred option of medium growth is too optimistic and a low growth scenario should be pursued, focusing on regeneration and developing existing identified sites. Most of the housing requirement to 2024 could be met from existing allocations through the 'low growth' option. There is a need to define and justify 'flexibility allowance', which in any case is considered inappropriate given the optimistic household projections. The flexibility allowance is unquantified and too high, and this together with the absence of windfall and small sites in the housing calculations, means the Plan is at risk of over-supplying housing land to the detriment of regeneration, sustainable housing locations and the consolidation of existing communities.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections. However, in accordance with Scottish Planning Policy, the Council is required to provide a generous supply of housing land, and to build a degree of flexibility into the supply. Some additional sites are required to meet requirements and to provide this flexibility.

Main Issue 2: Sustainable Housing Locations, Rural South

The option for modest settlement expansion in the Rural South is not supported and a strategy of consolidation should be adopted, relying on existing allocations. There has been no commensurate increase or improvements in infrastructure or services in Shieldhill despite its growth over the last 25-30 years, and there is an issue with the provision of public open space. The 'Low Growth' option is more realistic and should be pursued.

Council response: The amount of additional land allocated for housing in the Rural South through the Proposed Plan (over and above existing committed sites) is only 70 units, which is not considered excessive.

SHIE/B Shieldhill Potential New Sites

Objection is made to the site at Hillcrest, Shieldhill (SHIE/B/02). Pursuing a strategy of consolidation, regeneration and low growth would do away with the need to release site SHIE/B/02. Proposals for housing development have been the subject of refusals of planning consent, and development of the site would erode the countryside/wildlife habitat and lead to settlement coalescence. There are also infrastructure limitations.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

SHIE/B Shieldhill Potential New Sites

Objection is made to housing at Belmont Avenue, Shieldhill (SHIE/B/01).

Council response: The site is not identified as a housing proposal in the Proposed Plan. It is designated as open space and is subject to the green network Proposal GN16, which seeks to improve the landscape setting of the Lower Braes villages.

SHIE/B Shieldhill Potential New Sites

Objection is made to housing at Burnhead Farm, Shieldhill (SHIE/B/03).

Council response: The site has not been identified as a housing proposal in the Proposed Plan.

SHIE/B Shieldhill Potential New Sites

Objection is made to housing at Greenwells Farm, Shieldhill (SHIE/B/04)

Council response: The site is not identified as a housing proposal in the Proposed Plan.

00991 **Anderson J M**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath.

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There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston.

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01009 **Anderson John A**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site.

Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00446 **Antonine Property Development Group**

Comments: 1

B&B/B Bonnybridge and Banknock Potential New Sites

The allocation of the Bonnybridge East site (B&B/B/10) is sought together with Anderson Park as a site for housing, sport and recreation, although only sport and recreation uses are advocated on Anderson Park.

Council response: The site at East Bonnybridge has been identified as a proposal for mixed use (housing and recreation facilities) in the Proposed pPan.

00502 **Antonshill SOS**

Comments: 1

6 The Preferred Spatial Strategy

Antonshill Residents Association comment that they are mindful of how their protected open space was taken from them despite assurances it wouldn't be and a petition showed 93.3% of the local households in opposition. They comment that the same words of assurance used then, are now being attached to their last bit of free space (football pitch). It is suggested that the intentions of the Main Issues Report are useless if not adhered to when there is a convenient development opportunity.

Council response: Comments noted. The football pitch at Antonshill is protected by the Council's Open Space Policy INF03. The pitch is identified as a principle area of open space and accordingly will be highlighted as such on the LDP Proposals Plan. The Council seeks to protect all urban open space, including parks, playing fields and other areas of urban greenspace, which is considered to have landscape, amenity, recreational or ecological value. The policy provides stringent criteria for assessing proposals involving the loss of such open spaces.

00964 **Arnott Ruth**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of the village. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure (particularly schools, leisure and healthcare) will not be able to cope with the scale of development envisaged on all of these sites. There is limited market demand for housing on such a large scale.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00856 **Asda Stores Ltd**

Comments: 4

Vision

The general principles embodied in the preferred vision are supported, including the aim of creating a network of thriving communities and a vibrant and growing economy. Investment made by ASDA in three of the town centres supports this vision.

Council response: Support welcomed.

Main Issue 1: Housing Growth

The medium growth option is supported and is considered realistic, as recent high growth rates are probably unsustainable. Failure to allocate sufficient housing will undermine the economy of the Council area.

Council response: Support welcomed.

Main Issue 2: Sustainable Housing Locations

Concern is expressed about the unbalanced nature of allocations, and in particular the lack of housing identified for Grangemouth. This will lead to population decline with adverse implications for the community and Grangemouth Town Centre. Additional housing should be identified to support the sustainable growth of the town.

Council response: Housing allocations have been spread across the various settlements, having regard to their size, the scale of appropriate opportunities, and the level of environmental and infrastructure constraints. Grangemouth is heavily constrained by major hazard, flooding and other physical constraints, severely limiting the opportunity for housing growth. Grangemouth Town Centre is, however, identified as an opportunity area in the Proposed Plan, and efforts are being made to bring forward a regeneration masterplan for the Town Centre.

Main Issues 8: Town Centres and Retail Provision

The overall strategy for retailing and town centres is supported. In particular, it is important that town centres are protected from the adverse impacts of out-of-centre retail development. However, criticism is made of the Council's retail capacity study. Comparison goods shopping in smaller town centres should be supported. With regard to new convenience floorspace, a number of observations are made for different settlements. In Bo'ness, out-of-centre or edge-of-centre foodstores should not be supported as they will adversely affect the Town Centre. In Denny/Bonnybridge, any stores which would draw trade from communities other than Denny and Bonnybridge should not be supported. In Larbert/Stenhousemuir, further supermarkets should be opposed. In Grangemouth, there is no case for any additional foodstore.

Council response: Comments noted. The strategy in the Proposed Plan is to strengthen food retailing in those District and Local Centres experiencing extensive leakage of expenditure, i.e. Denny, Bonnybridge and Bo'ness.

00464 **Avonbridge and Standburn Community Council**

Comments: 6

Main Issue 9: Strategic Access and Sustainable Travel

The B & C road network in the South Braes area suffers from intensive use as a result of the lack of investment in the Avon Gorge and the non provision of the new road. The A801 Avon Gorge upgrade must be a priority. The B825 principally between the Bowhouse Roundabout and Avonbridge is inadequate for current capacity and in a dismal state of repair. Pedestrian footpaths should be considered as a priority. Current planning applications will exacerbate the situation as will further housing developments in the area. Significant investment is required for this road alone.

Council response: Proposal INF07 makes provision for a new bridge and approach roads on the A801 at Avon Gorge. The capacity of the B825 road in general is considered adequate to cope with new development although the cumulative impact of development on its junction with the B8028 in Avonbridge may need to be addressed at the planning application stage.

Main Issue 11: Design Quality and Place Making

Consideration should be given to the maintenance of existing landscaped areas within the villages of both Standburn and Avonbridge and further creation of planted areas to enhance the centre of the villages and encourage pride and respect from the local community. Attention should also be given to the war memorials in both villages.

Council response: Comments noted. Village centres are included as key opportunities for placemaking and environmental enhancement in Policy D01 within the Proposed Plan.

Main Issue 12: The Green Network

The Avon Heritage Trail is in poor condition and un-walkable for most of the year. Residents are keen to retain such access to the Trail as remains to the west of Avonpark and recommend the creation of a walkway now in advance of any further development. The area required should be identified now and retained for future development of the Trail to prevent loss of access in future. There is a lack of maintenance and investment in Muiravonside Country Park. This is an ideal but underfunded and under used resource for the local community and schools in the area.

Council response: Comments noted.

Green Network opportunity GN26 "River Avon Corridor" recognises the opportunities to extend the access network upstream from Avonbridge to Slamannan.

Green Network opportunity GN27 "Muiravonside" recognises the opportunities to to enhance visitor attractions and recreational facilities, and improve woodland management at Muiravonside Country Park.

AVN/B Avonbridge Committed Sites

In allocating the site at Slamannan Road 3, Avonbridge (AVN/B/03), the Council must consider the provision of adequate sewerage provision and the upgrading of the B825 road. The current sewerage provision suffers from flooding at regular intervals and will be unable to cope with the existing allocation of 4 housing sites (AVN/A/01-04), let alone a further two.

Council response: The site at Slamannan Road is identified as a housing proposal in the Proposed Plan, and is viewed as an opportunity to increase choice in Avonbridge whilst rounding off development in the eastern part of the village. The need for upgrading of the sewage treatment works is acknowledged in the plan. Any necessary upgrading of the road network would considered through a Transport Assessment at the planning application stage.

AVN/B Avonbridge Committed Sites

In allocating the site at Bridgend Road, Avonbridge (AVN/B/02), the Council must consider the provision of adequate sewerage provision and the upgrading of the B825 road. The current sewerage provision suffers from flooding at regular intervals and will be unable to cope with the existing allocation of 4 housing sites (AVN/A01-04) let alone a further two. Access to AVN/B/02 is a concern, mainly due to the lack of parking provision for existing houses.

Council response: The site at Bridgend Road is identified as a housing proposal in the Proposed Plan, and is viewed as an opportunity to increase choice in Avonbridge whilst rounding off development in the eastern part of the village. The need for upgrading of the sewage treatment works is acknowledged in the Plan. Any necessary upgrading of the road network would considered through a Transport Assessment at the planning application stage.

STA/A Standburn Committed Sites

In allocating the site at Standburn (STA/A/01) and sites in Avonbridge, the Council must consider the provision of adequate sewerage provision and the upgrading of the B825 road.

Council response: The implications of housing growth for capacity at Avonbridge WWTW has been highlighted to Scottish Water. The capacity of the B825 road in general is considered adequate, although the cumulative impact of development on the junction with the B8028 in Avonbridge may need to be addressed at the planning application stage.

00906 **AWG Property**

Comments: 9

Vision

The Council's vision is supported, but some of the committed site allocations are unlikely to materialise in the foreseeable future. Additional allocations, which are deliverable and effective, should be made for the short and medium term. The vision should make reference to ensuring that sufficient land for new, well-designed housing is provided.

Council response: Support welcomed. Output from the housing land supply has been revised as part of the preparation of the Proposed Plan, and the range of housing sites is considered to constitute a generous supply. Supply of housing land is referenced in the detailed vision in the Proposed Plan.

Main Issue 1: Housing Growth

The Council's approach to housing growth places too much reliance on existing regeneration initiatives and existing commitments, with only modest expansion by way of identification of new site, e.g. reliance on Bo'ness foreshore which the developer has withdrawn from. The Council should seek to meet the HNDA requirement in full with an additional flexibility allowance. The recommendation is therefore that a higher rate of growth is adopted to ensure sufficient effective land is identified.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SIRR at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing Locations

The Council needs to be more specific about its preferred distribution of growth in the period 2024-2034. A schematic drawing in the LDP identifying general areas for growth would be more helpful. The Council should also consider introducing a policy allowing land allocations to be rephased to the 2014-2024 period.

Council response: The approach to long term growth is considered appropriate. The overall level of growth is specified, with a broad indication of potential for each settlement area. A number of the larger allocations will run on into the 2024-34 period, allowing for continuity. Two of the former SIRRs, at Bo'ness Foreshore and Slamannan, have also been deferred to post 2024 period. Additional sites will be brought forward, as and if required, at subsequent reviews of the LDP.

Main Issue 3: Housing Need

The Council's identification of a two tier quota system for housing sites over 20 units and the 15% requirement for Bo'ness is supported.

Council response: Comment noted.

Main Issue 5: Green Belt

The Council should revise the green belt boundary to the south of Bo'ness to allow future growth at sites BNS/B/02 and 03 as well as BNS/B/01. This would allow planned growth to be accommodated as part of the long-term settlement strategy.

Council response: Provision has been made for a small-scale green belt release at Kinglass Farm in Bo'ness. There is no justification for a large-scale release at Bo'mains Farm in terms of housing requirements in the town. The site in question forms an important part of the green belt, and contributes to its function.

Main Issue 11: Design Quality and Place Making

The place making priorities are supported, including town gateways and approaches, and the CSGN. A sensitive approach to the development of the sites at Bo'mains Farm (BNS/B/01, 02 and 03) can assist in enhancing the approach to Bo'ness

Council response: Support noted.

Main Issue 12: The Green Network

The proposals at Bo'mains Farm (BNS/B/01, 02 and 03) would complement the Council's promotion of the green network in south Bo'ness, as demonstrated in concept plans for these sites.

Council response: The Bomains Farm 1 site (Kinglass Farm 1 in the Proposed Plan) has been identified as a housing proposal in the Proposed Plan and will be expected to contribute to the green network. The release of the other Bo'mains sites is not supported.

BNS/B Bo'ness Potential New Sites

The identification of the Bo'mains 1 site (BNS/B/01) as a preferred site is supported. A conceptual masterplan has been prepared and the site is considered to have a capacity of around 165 units.

Council response: Support noted. The site has been identified as a housing proposal in the Proposed Plan, with an indicative capacity of 160 units.

BNS/B Bo'ness Potential New Sites

The Bo'main's Farm 2 and 3 sites (BNS/B/02 and BNS/B/03) should be identified as preferred sites for 2014-2024 to deliver a higher growth scenario in view of uncertainties over existing commitments.

Council response: These sites have not been identified as housing proposals in the Proposed Plan. They would represent a substantial extension of the urban area into the green belt, with an edge that would not form a strong or logical green belt boundary, and substantial landscape impacts. The scale of development would be excessive for the town. The sites allocated already provide a generous level of growth for the period 2014-2024.

00544 **Badger Ronald**

Comments: 1

FAL/A Falkirk Committed Sites

Concern is expressed about the future vitality of the east end of Falkirk High Street. It is essential that the Tesco site is redeveloped to secure the survival of east end businesses. The opening of Tesco in Camelon has the potential to draw trade from the High Street so something urgently needs done to allow the High Street to compete.

Council response: Comments noted. The East End has been identified as an opportunity area in the Proposed Plan, but action is dependent on landowners. Proposed Plan highlights the Falkirk Town Centre Townscape Heritage Initiative (THI) which will be a major boost to enhancement and regeneration.

00901 **Baird John**

Comments: 2

Main Issue 2: Sustainable Housing Locations

It is considered that insufficient provision is made in the Polmont Area, and in particular the Maddiston area and that the lack of supply is unsustainable and will limit choice and activity as well as constraining infrastructure investment. Objection is made to the section of the MIR on land supply (Paras 3.54-3.59) and in spatial strategy terms. Alternative allocations are made at Middlerigg, Reddingmuirhead at Maddiston and Rumford none of which appear to be as sustainable as the Standrigg Road land in environmental terms. This will lead to a lack of choice and restrict developer interest. The scale of the Middlerigg site and its environmental impact is queried in respect of accessibility, landscape and visual intrusion. There would also have to be significant infrastructure investment to bring the site forward.

Council response: It was not considered appropriate to include this large allocation at Standrigg Road in either the MIR or the Proposed Plan. The site would have significant landscape impact, and has relatively low accessibility and there are education capacity issues at Wallacestone Primary School. The site identified within the MIR at Middlerigg, Reddingmuirhead has been removed. This is due to the scale of recent and projected growth in the area, landscape impact, and the requirement for primary school rezoning. The removal of the site addresses the outcome of the MIR consultation and concerns of the local community in relation to the above issues.

The focus of additional growth within the proposed plan will be at Maddiston East which will form a Strategic Growth Area as well as some limited infill opportunities. This is considered to represent the best option for greenfield expansion in the area in terms of landscape impact, accessibility, and impact on infrastructure. It is considered that this will provide sufficient choice and flexibility to meet the Housing Land Requirement.

POL/B Polmont Potential New Sites

Objects to the non-inclusion of Standrigg Road East and West (POL/B/13 and POL/B/17) as preferred sites. It is considered that the sites would meet deficiencies in the housing land supply, would make a positive contribution to the Green Network, and would promote local regeneration.

Council response: It was not considered appropriate to include this large allocation at Standrigg Road in either the MIR or the Proposed Plan. The site would have significant landscape impact, and has relatively low accessibility and there are education capacity issues at Wallacestone Primary School.

The focus of additional growth within the Proposed Plan will be at Maddiston East which will form a Strategic Growth Area as well as some limited infill opportunities. This is considered to represent the best option for greenfield expansion in the area in terms of landscape impact, accessibility, and impact on infrastructure. It is considered that this will provide sufficient choice and flexibility to meet the Housing Land Requirement.

00795 **Baird William**

Comments: 1

RUR/B Rural Area Potential New Sites

Support for housing at Blackbraes, California (RUR/B.02) . Blackbraes was a village in the past and it would be nice to see it being more like a village again with more houses.

Council response: The site is located in the countryside outside the boundary of existing settlements and its development would be considered to be unsustainable due to the distance from existing services. The site furthermore does not correspond with the footprint of the former community at Blackbraes. Allocated sites in the wider Rural South area are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

00046 **Banknock, Hags and Longcroft Community Council**

Comments: 5

Main Issue 2: Sustainable Housing Locations

Concern is expressed about the volume of preferred new sites for housing development along the A803 corridor between

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Coneypark and Dennyloanhead. The total capacity of 250 new units over and above committed housing sites is excessive.

Council response: Comments noted. The A803 sliproad junctions with the M80 at Banknock and Hags which are planned to be upgraded to accommodate committed growth along the A803 corridor between Coneypark and Dennyloanhead are not planned to be upgraded with enough spare capacity to accommodate the development of any more sites along the A803 corridor over and above those already committed to through the Falkirk Council Local Plan. Planning a further upgrading of capacity of this sliproad junction so soon after the currently planned upgrade is not considered to be appropriate due to the disruption this would cause, so significant additional housing development along the A803 over and above that already committed is not considered to be appropriate for development in the 2014-2024 period but could become a viable long term growth option.

Main Issue 2: Sustainable Housing Locations

Identifying committed/preferred/non-preferred sites is helpful as hopefully it will prevent (or at least minimise) previously unconsidered sites appearing late in the process.

Council response: Comment noted. You should be aware of the three new sites which were promoted through the MIR consultation process in the Bonnybridge and Banknock Area. Although not included as opportunities for housing growth within the Proposed Plan these sites have been considered in Revised Technical Report 2 "Site Assessment " and Appendix 6 of the Revised Environmental Report.

B&B/A Bonnybridge and Banknock Committed Sites

The site at Mayfield Drive (B&B/A/01) is currently public open space. There is inadequate provision of open space/kick-about/play areas in Longcroft. The site should not be developed and should be removed from the list of housing development sites.

Council response: The site at Mayfield Drive is not proposed to be allocated as a housing opportunity in the Proposed Plan

B&B/B Bonnybridge and Banknock Potential New Sites

Proposed development to the west of Wyndford Road is undesirable on the Coneypark Farm 1 site (B&B/B/01)

Council response: The site at Coneypark Farm 1 (B&B/B/01) has not been carried forward into the Proposed Plan as an opportunity for housing growth.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Glasgow Road 1 site (B&B/B/04) may be dangerous due to its proximity to the major hazard at the bonded warehouse complex. This issue warrants further consideration.

Council response: The site at Glasgow Road 1 (B&B/B/04) has not been carried forward into the Proposed Plan as an opportunity for housing growth. The site is not impinged upon by the major hazard consultation zones for the adjacent bonded warehouse complex which are shown on Proposal Map 1.

01024 **Begg Helene**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site.

Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00508 **Bellair Property Investments Limited**

Comments: 3

Main Issue 7: Employment Land

The preferred option for employment sites is broadly supported, although it is considered that there is scope for further economic development opportunities in the area, such as at Lochlands. The intention to allow additional flexibility in the permitted range of uses on employment sites is welcomed. This could include hotel, leisure, tourism and related commercial development.

Council response: Support noted. An additional site at Lochlands has been included in the Proposed Plan.

FAL/B Falkirk Potential New Sites

The identification of both the existing Caledon Business Park site and the site extension within the preferred option is welcomed. The developer is committed to delivering a high quality development at this location. There should be recognition that economic development can comprise a variety of uses including hotel, leisure, tourism and related commercial development.

Council response: Support for allocation and extension noted. The site is considered most appropriate for business and industry use, the nearby sites at the Falkirk Gateway and Stadium being more appropriate for leisure and tourism development.

FAL/B Falkirk Potential New Sites

The Lochlands 3 site (FAL/B/16) presents a viable and attractive opportunity for economic development. This is more deliverable than the Lochlands 1 site which has been identified (FAL/B/05) because the latter is constrained by a scheduled ancient monument.

Council response: The site has not been included as an economic development proposal in the Proposed Plan. It is a large site, within the green belt, and lying partly within a scheduled ancient monument, and so is not considered appropriate for development.

00864 **Berry Jane**

Comments: 2

SLA/B Slamannan Potential New Sites

Support for Hillend West, Slamannan (SLA/B/02) and more housing to regenerate the village by improving the centre, bringing new employment opportunities and jobs, more pupils to assist in creating after-school care and other local services, including an expansion of the existing bus service.

Council response: The Hillend West site has been allocated in the Proposed Plan as part of the wider Hillend Farm site (H70). However, whilst the Council is still promoting a strategy of housing-led regeneration in Slamannan, the overall scale of housing in the village has been scaled back to what are considered more realistic levels, in the light of development constraints and market conditions.

SLA/B Slamannan Potential New Sites

Support for Southfield Farm, Slamannan (SLA/B/01) and more housing to regenerate the village by improving the centre, bringing new employment opportunities and jobs, more pupils to assist in creating after-school care and other local services, including an expansion of the existing bus service.

Council response: The Southfield farm site has not been identified as a housing proposal in the Proposed Plan. Whilst the Council is still promoting a strategy of housing-led regeneration in Slamannan, the overall scale of housing in the village has been scaled back to what are considered more realistic levels, in the light of development constraints and market conditions.

00450 **Bett Homes**

Comments: 8

Main Issue 1: Housing Growth

Bett Homes support the Council's preferred strategy of 'medium growth' as a minimum of 725 house completions per annum to meet identified housing need and demand for 2014-24 period. However, the HNDA confirms a housing requirement of approx 900 houses per annum. If a medium growth strategy is adopted then it is essential to include a land release mechanism to top up the effective land supply if the effective sites in the Established Land Supply do not meet the housing requirement or maintain a 5 year supply at all times, in accordance with SPP para 75. It is essential that LDP introduces a policy to provide this essential mechanism to allow additional effective sites to come forward prior to the next plan review if a generous supply is not maintained

Council response: Support welcomed. Updated household projections have been used to recalculate the housing requirement, and this has been used to derive the revised housing target of 675 houses per annum, a reduction from the MIR target. The effectiveness and phasing of existing sites has also been reviewed.

Main Issue 2: Sustainable housing locations

The Council's preferred strategy in Denny is supported, to include Mydub 2 as a housing allocation in LDP. The Council's acknowledgement that Denny has a 'high' long term growth potential in 2024-2034 is also supported. Any additional new development should be directed to sustainable locations in accord with the SPP.

Council response: The Mydub 2 site has been identified as housing proposal H16 in the Proposed Plan. The site forms a large extension to the adjacent committed Mydub 1 site. As such its development phasing will be linked to the build out of that site and in particular to the completion of the DEAR road, as the site is dependent on that road's existence for access. The site's development would continue the broad direction of growth for Denny favoured by the current Structure Plan. The site's development is likely to have a significant impact on primary school capacity and will require phasing towards the latter half of the LDP period. Site layout and design should take careful account of flood risk and potential protected species habitats around the Little Denny Burn and the presence of prime agricultural land on the western fringes.

Main Issue 3: Housing Need

The Council's two tiered approach to its LDP affordable housing policy is supported, as set out in Figure 3.7 of the MIR. This two tiered approach relates to identified needs set out in the HNDA. It is recommended that the Council should make reference to the Local Housing Strategy (LHS) in the LDP. The LHS is to provide the strategic direction to tackle housing need and demand and to inform future investment in housing and related services across the local authority area. It will include housing supply targets covering all tenures to determine the type of low cost housing units required in each area. The LDP policy or supporting text should reflect the possible categories of affordable housing and should take account of financial viability as set out in SPP and PAN2/2010. Bett Homes also provide a compendium of good practice, drawn from experience around Scotland, to help deliver affordable housing.

Council response: Comment noted. Reference to the LHS and the affordable housing supply target is contained in revised Technical Paper 3 Housing Requirements. Proposed Plan policy HSG02 refers to Supplementary Guidance where details of the types of affordable housing will be set out.

Main Issue 4: Infrastructure for Growth

The Council's preferred option to infrastructure is supported, promoting modest additional growth, which can utilise existing infrastructure capacity and minimise additional significant infrastructure requirements over and above existing planned

Authority Response to Contributions by Contributor for FLDP_MAIN

upgrades. It is acknowledged that the delivery of the Denny Eastern Access Road (DEAR) is an important part of the Council's transport strategy and Bett will make an appropriate developer contribution to its delivery in accord with Circular 1/2010 and the Council's SPG on DEAR. The Council is encouraged to consider the need to avoid up-front infrastructure investment in the delivery of new developments. Such investment should be funded jointly, with developer contributions funded from the site's progressive development. Planning obligations should seek a schedule of payments and this schedule can be used to borrow funds through prudential borrowing. This approach should not be too complex to adopt. It is recommended any proposed LDP policy or associated SPG on developer contributions must facilitate development through considering cash flow, taking account of the need for any payments from developer contributions to comply with the policy tests in Circular 1/2010.

Council response: Supporting comment noted. Proposed Plan policy INF01 Strategic Infrastructure makes provision for the Council to explore traditional and innovative funding mechanisms, including prudential borrowing, to secure the provision of infrastructure. Proposed Plan policy INF2 and related SG concerned with developer contributions highlight need for S75s to comply with the provisions of Circular 3/2012.

Main Issue 5: Green Belt

The Council's preferred option for green belt is supported in principle. However, any modifications to the boundary of the green belt must be in accord with SPP (paras. 159 - 164). In particular, a comprehensive boundary review in accord with SPP para. 162 is essential. Any new boundary adjustment for the green belt must follow clearly identifiable physical features to provide a robust and permanent feature in the landscape. It is essential that the green belt boundary is not drawn too tightly against the settlement edge and if necessary, other policy designations are used to control unacceptable development in the countryside. It is also recommended the LDP needs to include sufficient flexibility in its spatial strategy to enable additional and sustainable land to be released for development where it is concluded that the Council is not maintaining a 5 year land supply at all times in accord with SPP.

Council response: Comments noted. A green belt review has been undertaken in association with the MIR to inform options and to look in detail at boundaries. Green belt releases have been proposed, and the boundaries of the green belt provide ample scope for development over the period of the plan.

Main Issue 9: Strategic Access and Sustainable Travel

Support is given to the Council's preferred option to address outstanding constraints in the strategic and local road network. This includes the delivery of the Denny Eastern Access Road (DEAR), which will relieve pressure at Denny Cross.

Council response: Supportive comment noted. Proposed Plan proposal INF14 makes provision for DEAR.

Main Issue 11: Design Quality and Place Making

Support for the Council's preferred option for Design Quality and Place-Making is given in part. While the importance of setting key design principles in policy is acknowledged, there is no value in creating excessive supplementary guidance or masterplanning briefs as site specific considerations can be explored at the planning application stage. Bett Homes is committed to working with the Council in creating development proposals which accord with key design policies, are place specific and informed by technical appraisal work and community consultation during the pre-application stage. The preparation of this work at the planning application stage rather than through SPGs or Brief for individual sites is recommended. This will avoid unnecessary delays to the delivery of much needed homes and construction jobs.

Council response: Comments noted. The preparation of formal guidance to guide developer masterplans is not always necessary. A collaborative, workshop-based approach involving key stakeholders can also provide an effective steer for masterplans.

DEN/B Denny Potential New Sites

The inclusion of Mydub phase 2 (DEN/B/03) as a housing allocation in the LDP is supported. The site's allocation will continue the sustainable expansion of the south eastern edge of Denny in accord with existing Local Plan commitments for the delivery of both the Denny Eastern Access Road (DEAR) and the Mydub (Phase 1) housing site. The Council has highlighted an indicative capacity for this site of 250 homes. Bett indicative site capacity should be increased to circa 270 homes as this represents the capacity of the site in line with the Phase 1 proposal. This is designed to meet Designing Streets requirements with a resultant 29 dwellings per hectare (net). The site can provide 15% (circa 40 homes) of these 270 homes as affordable housing to meet identified needs in accord with the Council's affordable housing policy. A Development Framework Report is provided which further demonstrates the sustainability of this site and illustrates the key development principles of the proposal in accord with national and local policy and guidance.

Council response: The Mydub 2 site has been identified as housing proposal H16 in the Proposed Plan. The site forms a large extension to the adjacent committed Mydub 1 site. As such its development phasing will be linked to the build out of that site and in particular to the completion of the DEAR road, as the site is dependent on that road's existence for access. Proposed Plan Appendix I indicates a site capacity of 270, and Appendix 2 indicates a 15% affordable housing requirement. The Development Framework report is welcomed as a basis for the masterplanning of the site.

00900 **Black Anne**

Comments: 1

Main Issue 2: Sustainable Housing Locations

Slamannan and Limerigg are small villages which do not need more housing, certainly not of the scale proposed. Their character as small rural villages should be preserved. Limerigg is particular has few amenities and there is little capacity at Limerigg Primary School. The communities would benefit more from good cycle and safe walking links between the villages and with Falkirk and Caldercruix Station. This would allow cheaper access to services and support for people who want to improve their health.

Council response: Comments noted. The Proposed Plan continues to promote housing opportunities in Slamannan and Limerigg on the basis that these can bring much-needed regeneration and investment to these communities. In Slamannan, however, the scale of growth has been reviewed and reduced in the light of development constraints and market conditions.

00746 **Black David**

Comments: 3

Main Issue 2: Sustainable Housing Locations

Rejuvenation of Slamannan village is vital to ensure future progress. Regeneration would bring better facilities and services, and offer job opportunities.

Council response: Comment noted. The Proposed Plan continues to promote housing-led regeneration. However, a more realistic view has been taken of the likely scale of housing growth which the village may be able to support, and the timescale over which this is likely to occur.

SLA/B Slamannan Potential New Sites

Support for the proposed allocation at Southfield Farm, Slamannan (SLA/B/01) to enable access to site SLA/A/04 Blinkbonnie Terrace.

Council response: The scale of the development originally proposed as part of the Slamannan SIRR has been reviewed, and has been reduced in the light of development constraints and market conditions. This has resulted in the Blinkbonnie Terrace (SLA/A/04) and Southfield Farm (SLA/B/01) sites, which were preferred sites in the MIR, being omitted from the Proposed Plan.

SLA/B Slamannan Potential New Sites

Allocation of the site at Hillend West (SLA/B/02), to the north of Blinkbonnie Terrace (SLA/A/04), is essential for accessing the Hillend Farm site and would remove a large volume of traffic from Slamannan Village Centre.

Council response: The Hillhead West site has been identified for housing in the Proposed plan, as part of the wider Hillend Farm site (H70).

00796 **Blackley J**

Comments: 1

POL/B Polmont Potential New Sites

Objects to identification of Middlerigg Farm, Reddingmuirhead (POL/B/05) as preferred option. The area has seen substantial growth over the last few years. There is inadequate infrastructure to support this level of housing development. Fairhaven Terrace would be unsuitable as an access as it is narrow. There are infrastructure issues in terms of education capacity, roads, and healthcare provision. The area has a history of landslip, and wildlife would be disturbed or lost.

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00054 **Blackness Area Community Council**

Comments: 6

Main Issue 3: Housing Need

There is a desire for some affordable housing in the Blackness area, possibly with a change to a wider variety of housing types in the village.

Council response: No new housing site allocations are proposed for Blackness. However any windfall proposal will be subject to Proposed Plan policy HSG02 Affordable Housing.

Main Issue 4: Infrastructure for Growth

Open space/green infrastructure projects as part of wider infrastructure provision are supported.

Council response: Supportive comment noted. The Proposed Plan supports 32 opportunities to improve green infrastructure.

Main Issue 5: Green Belt

The green belt proposals are strongly supported by Blackness Area Community Council.

Council response: Support noted.

Main Issue 6: Countryside

Subject to there being appropriate control criteria, the proposed range of specific relaxations for housing in the countryside is supported on the understanding that the community council will be able to comment on the proposed supporting guidance prior to its adoption.

Council response: Comment noted. Community Councils will be consulted on the Supplementary Guidance.

Main Issue 10: Climate Change

There is a concern about the potential proliferation of large wind turbine developments. The community council would like to be kept advised on the progress and content of the Landscape Capacity Study being progressed to inform the eventual Spatial Framework.

Council response: Comments noted. The Council is producing a Wind Energy Spatial Framework and Supplementary Planning Guidance which will set out guidance for wind energy developments within the Council area. It is intended that the guidance will safeguard more sensitive areas, and direct development to more appropriate locations.

Main Issue 12: The Green Network

The green network proposals are strongly supported, in particular the Blackness to Bo'ness path. Request to consider the reopening of the path on the B904 from Blackness PS to Champany.

Council response: Support noted.

00161 **Bo'ness Community Council**

Comments: 1

Main Issue 2: Sustainable Housing Locations

There are objections to development south of the town on farmland next to a Site of Special Scientific Interest. Continued development on green belt land is not favoured.

Council response: The site adjacent to the Bo'mains Meadow SSSI was a non-preferred site in the MIR and is not identified as a proposal for development in the Proposed Plan. Some green belt release (Kinglass Farm) further east on Borrowstoun Road is considered justified. Notwithstanding the loss of green belt, this site is considered to present a good opportunity for settlement expansion, rounding off the urban edge. Landscape impacts can be mitigated, and there are no overriding infrastructural constraints. The Bo'ness Foreshore site is no longer likely to come forward within the initial 10 year plan period, prompting the need to bring forward alternative sites.

00837 **Bonnybridge Community Council**

Comments: 5

Main Issue 2: Sustainable Housing Locations

There appear to be 1550 houses planned for Bonnybridge & Banknock, between 2014 and 2024. Infrastructure in the village has remained stationary whilst houses were built in previous years. Even the few which are planned will have a detrimental effect on the communities where they are situated. Greenhill has a single track road over the railway at Greenhill and a single track road under the railway at High Bonnybridge. The houses planned at High Bonnybridge will cause problems accessing the estate from Broomhill Road. Broomhill Road is busy enough at the moment. Houses are being built with no improvement in the infrastructure to cope with the extra people and extra cars. The planned houses in neighbouring villages will increase the pressure on the roads/schools/nurseries/health facilities in the village. There are issues with lack of parking in the centre of the village.

Council response: Comments noted. The Proposed Plan makes provision for 1422 houses to be built in the Bonnybridge and Banknock area between 2014 and 2024. The housing opportunity at Greenhill (GRE/B/01) indicated as a preferred option for housing growth in the MIR has not been carried forward into the Proposed Plan. Infrastructure issues in the area are acknowledged in the Proposed Plan and a number of infrastructure proposals identified.

Main Issue 7: Employment Land

Employment in Bonnybridge appears to be centred on the Chattan industrial estate (poor access) and Broomhill Road (very busy with 2 primary schools and a chapel). There is a need for more creative thinking. Falkirk Council has an empty site on Seabegs Road that is ideal for industrial development, with access to the new M80 via Allandale and Castlecary.

Council response: Comment noted. However, it has been decided to promote the Seabegs Road site as an opportunity for housing growth as part of the Council's new build housing programme.

Main Issue 9: Strategic Access and Sustainable Travel

Bonnybridge as a village is well served with surrounding countryside with most of the communities having access to it. However the community of Greenhill is cut off from the country park and the Bonny Water to the north of the canal. This could be improved with better access via the pend going under the canal at the east end of Antonine Wall on the road to Allandale (B816), making pedestrian access better and segregating people from cars driving at 60mph.

Council response: Proposed Plan proposal GN30 provides an opportunity to tackle the issue of access under the canal.

Main Issue 12: The Green Network

As the Bonny Water and the Forth and Clyde Canal are a component within the Green Network, improving access to these components from Greenhill, would fit in well.

Council response: Comment noted. Green network opportunity GN30 "Bonnyfield Expansion" includes further opportunities to improve access to the Local Nature Reserve from Seabegs Road area via Seabegs Pend under Forth and Clyde Canal

B&B/B Bonnybridge and Banknock Potential New Sites

The Seabegs Road Depot site (B&B/B/11) is ideal for industrial development, with access to the new M80 via Allandale and Castlecary.

Council response: Comment noted. However, it has been decided to promote this site as an opportunity for housing growth as part of the Council's new build housing programme.

00808 **Bowman**

Comments: 1

POL/B Polmont Potential New Sites

Object to potential development sites at Standrigg Road. Development would result in visual impact and would change the rural character of the area. The sites are very exposed and there are drainage problems. There is inadequate infrastructure to support new development in terms of schools, health care, and road network.

Council response: The Standrigg Road sites, which were non-preferred sites in the MIR, have not been identified as housing proposals in the Proposed Plan.

00897 **BP North Sea Infrastructure**

Comments: 5

Main Issue 7: Employment Land

The reuse of the existing local plan policy EP 18 is supported. The policy should also include the following wording: "In determining planning applications for development within consultation zones for hazardous installations, the council will consult with and take full account of the advice from the facility's operators and owners and will seek to ensure that any risk to people's safety is not increased." The inclusion of pipeline consultation zones in the local plan is also supported and should be continued in the proposed plan.

Council response: Proposed Plan policy BUS05 takes forward local plan policy EP18. It seeks to ensure that any risk to people's safety is not increased, where proposal come forward in consultation zones, through the control of hazardous substances on operators' sites and controlling the potential impact of new development on existing chemical and petrochemical operations. The Proposals Maps continue to show pipeline consultation zones.

BNS/A Bo'ness Committed Sites

The site at Corbiehall, Bo'ness (BNS/A/01) is within the middle zone of the consultation distance (CD) for the Forties Pipeline and the proposed density is over the recommended PADHI density of no more than 40/ha. A note should be added to the allocation highlighting that the site is within a CD and that development should comply with the plan's major hazards policy.

Council response: The site is not identified as a housing proposal in the Proposed Plan.

BNS/A Bo'ness Committed Sites

The site at South Street, Bo'ness (BNS/A/04) is within the middle zone of the consultation distance (CD) for the Forties Pipeline and the proposed density is over the recommended PADHI density of no more than 40/ha. A note should be added to the allocation highlighting that the site is within a CD and that development should comply with the plan's major hazards policy.

Council response: The Site Schedule (Appendix 1) of the Proposed Plan notes that the site is within a Pipeline Consultation Zone.

BNS/A Bo'ness Committed Sites

The site at Main Street, Bo'ness (BNS/A/07) is within the middle zone of the consultation distance (CD) for the Forties Pipeline and the proposed density is within the recommended PADHI density of no more than 40/ha. As a precaution a note should be added to the allocation highlighting that the site is within a CD and that development should comply with the plan's major hazards policy.

Council response: The Site Schedule (Appendix 1) of the Proposed Plan notes that the site is within a Pipeline Consultation Zone.

BNS/A Bo'ness Committed Sites

Only 2 small parts of the large Bo'ness foreshore site (BNS/A/08) are within the middle zone of the consultation distance (CD) for the Forties Pipeline and while they are constrained by the railway line and harbour could still be developed for housing. For this reason a note should be added to the allocation highlighting that the site is within a CD and that development should comply with the plan's major hazards policy.

Council response: The Strategic Growth Area Guidance (Appendix 2 of the Proposed Plan) for the Bo'ness Foreshore site notes that health and safety constraints arising from the proximity of the BP Forties pipeline require to be addressed.

00799 Braid Campbell

Comments: 2

Main Issue 2: Sustainable Housing Locations

Objection is made to potential development at Sunnyside Road, and Standrigg Road. There is substantial housebuilding ongoing in the area and there are concerns about landscape impact of the development and infrastructure capacity in terms of schools, roads and services. There are significant brownfield sites which are not yet completed in the Polmont area including Whitecross, Redding Park which should be developed first. Development in the Sunnyside Rd/Standrigg Rd area would erode the green belt.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

POL/B Polmont Potential New Sites

Objects to potential development at Sunnyside Road, and Standrigg Road. There is substantial housebuilding ongoing in the area and there are concerns about landscape impact of the development and infrastructure capacity in terms of schools, roads and services. Development of Sunnyside Road would destroy 'green belt' and would change the semi-rural character of the area. There are other brownfield sites such as Whitecross and Redding Bank which should be developed before green field sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00123 Brightons Community Council

Comments: 7

Main Issue 2: Sustainable Housing Locations

The site at Sunnyside Road, Brightons (POL/B/15) should not be developed. Further development will cause increased pressure on infrastructure including roads and sewer systems and planning gain should be rigorously sought for new developments.

Council response: The site has not been identified as a housing proposal in the proposed Plan, in recognition of issues with effectiveness and education capacity.

Authority Response to Contributions by Contributor for FLDP_MAINMain Issue 3: Housing Need

Affordable housing should be included with robust criteria given to developers to ensure such housing is indeed affordable and mixed within developments. Social housing developments must also be designed to integrate successfully with existing sites.

Council response: SG supporting Proposed Plan policy HSG02 Affordable Housing sets out a procedure for the negotiation of affordable housing provision and provides guidance on the integration of affordable housing with mainstream housing.

Main Issue 5: Green Belt

Current Green belt boundaries should be retained. Boundaries should not be relaxed as this can lead to coalescence of settlements.

Council response: Comments noted. There have been some selective green belt releases in the Proposed Plan, which are considered necessary to provide some additional scope for development in communities.

Main Issue 6: Countryside

Countryside development should not be relaxed. Rural settings are often the only areas where a Scottish vernacular still exists. Therefore buildings and landscape should be valued and protected. Replacement house applications should not allow the removal of sound structures for modern alternatives unless designed in keeping with neighbouring properties.

Council response: Comments noted. The policies in the Proposed Plan seek find a balance between the Scottish Planning Policy's advocacy of more housing opportunities in the countryside, and the need to safeguard the character and amenity of the rural areas.

Main Issue 7: Employment Land

Small-scale, well-designed and affordable employment land and industrial units should be provided within existing village areas.

Council response: Comment noted. The spatial strategy of the Proposed Plan is to focus employment land on the existing major economic development opportunities in the M9/M876/A801 corridor, on the basis that these are best placed to attract significant inward investment to the area. These are augmented by the identification of other local business sites within communities across the Council area and local scale employment development within villages is supported by policy BUS04.

Main Issue 13: Cultural Heritage

Existing cultural heritage policies should not be diluted. Any restoration of historic buildings must maintain the buildings external appearance and internally if relevant. Greater importance should be given to buildings which may not be listed, yet still important and of good quality.

Council response: Comment noted.

Main Issue 14: Waste and Minerals

Existing waste management sites require tighter control and there needs to be more transparency in their operations and permitted capacities.

Council response: The comments are noted. Existing waste management sites are conditioned through planning applications or through SEPA licensing controls.

00232 **Brown Alexander**

Comments: 1

B&B/B Bonnybridge and Banknock Potential New Sites

Pleased to note that the site has been included as a preferred site for housing.

Council response: The site has been identified in the Proposed Plan as a housing proposal. Support noted.

00789 **Brown George**

Comments: 1

Main Issue 10: Climate Change

Existing storage heaters are inefficient. Since there is no gas in the village, the installation of electric combi heating is sought.

Council response: Comment noted. Household heating is outwith the scope of the Local Development Plan.

01008 **Brown John**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site.

Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01007 **Brown R**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00950 **Brown Tom**

Comments: 3

Main Issue 2: Sustainable Housing Locations

The town is constrained by the M9, the river and industrial sites and it is not clear what the impact of the freight hub will be or what arrangements are being made to minimise the impact of freight movements generally on local residents. There is no capacity for housing growth and an increase in industry such as biomass and the Asda Depot. Existing housing stock should also be prioritised and maintained to a good standard. Major hazards also constrain housing growth, although this did not appear to constrain the Asda development. There should be some community payback from the loss of trees and attractive buildings on the Asda site which softened the entrance to Grangemouth. It is important to consider what priorities are contained within the flood management plan given the vulnerability of the freight hub and other industry.

Council response: The transfer of freight from road to rail is supported in Policy INF09 and the impact of development on local communities is also highlighted as an important policy consideration. Policy BUS05 acknowledges that there are constraints to development in Grangemouth and as housing is assessed differently by the HSE there is less scope for further development than for business uses. The maintenance of existing housing stock is not within the remit of the proposed plan. The Flood Risk Management Plan will take the needs of industry in Grangemouth into account.

Main Issue 8: Town Centres and Retail Provision

The regeneration of the town centre has taken on a greater urgency as a result of the further diminution of the town by the Asda decision. Access to the town is also affected by the growth of commercial traffic to the east and west of the town and it will be more difficult to get past these sites.

Council response: Comments noted. Grangemouth Town Centre is identified as an opportunity area in the Proposed Plan, and there are ongoing efforts to secure a viable regeneration masterplan .

Main Issue 10: Climate Change

Biomass on the level envisaged is not 'renewable' energy and cannot be part of any supportive policy framework for renewable energy developments. There is a conflict with the destruction of so many mature trees on the Asda site with the comments in para.5.38 with regard to green networks within the area.

Council response: Comments noted. The Grangemouth Biomass proposal is currently being considered by the Scottish Government. Proposals for other biomass proposals will be considered on an individual basis against renewable energy policy RW01 and other relevant policies of the Proposed Plan.

01017 **Bruce Christine A & R M**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01026 **Bruce Gilbert**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont

railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01003 **Burt**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00818 **Burt and Miss Helen Scott George**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on sites POL/B/2,3,13,15 & 17. Local roads and public transportation infrastructure will not be able to cope with the scale of development envisaged on all of these sites without significant further investment.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00844 **Byers Graham**

Comments: 1

Main Issue 2: Sustainable Housing Locations

Development of housing on sites POL/B/2,3,13,15 & 17 is not supported. Local infrastructure (particularly schools, transportation and healthcare) will not be able to cope with the scale of development envisaged on all of these sites which will have an adverse effect on the local environment and lead to an increased risk of flooding.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00512 **Cala Management Ltd.**

Comments: 6

Main Issue 1: Housing Growth

Cala do not support Falkirk Council's preferred option of medium housing growth. They are concerned that market conditions have been used to artificially suppress housing need figures, and the medium growth option is not 'generous' as required by Scottish Government and therefore does not comply with Circular 2/2010 and the SPP (paragraph 66). In addition Cala consider that the former SIRR sites should be removed from the calculation of output from existing sites in Figure 3.2. It is felt that the likelihood of the SIRR sites delivering housing within the LDP period is even more remote today, and therefore their inclusion as sources of output is not realistic. Cala suggest that the 'high growth' option as stated within the MIR Main Issues 1 is adopted.

Council response: Comments noted. The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SIRRs at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing Locations

Cala consider that there will be individual instances in the LDP where significant levels of growth will be required in order to accommodate the higher level of housing land requirement that will result from the removal of the SIRR sites from the committed development calculations. Therefore the option of major growth in a limited number of areas is supported. The proposed preferred strategy of no additional housing for Larbert/Stenhousemuir is disputed.

Council response: Comments noted. This view is not supported, both existing and new allocated sites, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 4: Infrastructure for Growth

An extension to Larbert High School will not happen without further planned development and the resulting planning contributions this would generate. Cala therefore disagree with the preferred option set out in paragraph 3.95, which promotes modest additional growth thereby minimising additional significant infrastructure requirements. Housing growth must be seen as part of the solution to the lack of capacity at Larbert High School rather than the problem. Therefore Cala support the alternative option set out in paragraph 3.96 which supports further large scale housing releases to generate

Authority Response to Contributions by Contributor for FLDP_MAIN

higher levels of developer contributions to deal with infrastructure constraints.

Council response: This view is not accepted. Capacity enhancements at Larbert High School involving the conversion of the adjacent Carrongrange school accommodation is planned. The new capacity will be part funded by Scottish Government grant.

Main Issue 5: Green Belt

Cala support the alternative approach to growth outlined in paragraph 3.105 which promotes large scale green belt releases to facilitate major growth. Hill of Kinnaird 3 is put forward as a suitable location for further planned expansion with the green belt boundary being amended accordingly. It should be removed from the green belt for the following reasons:

1. The continued designation as green belt does not fulfil the main purposes of a green belt;
2. There is no difference in character or quality between the landscape being developed at Bellsdyke / Hill of Kinnaird, and the landscape proposed for development at Hill of Kinnaird 3.
3. The established character is now residential, so the landscape setting of town will not be affected.
4. There is no risk of coalescence.
5. The site does not perform any function relating to protecting and giving access to open space.

In addition Cala suggest it would be a sensible to allow room for expansion at Larbert, and Hill of Kinnaird is the obvious and natural area for the expansion. This would be in line with SPP paragraph 162.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. There is no need or justification for the release of further greenfield land for housing development. Development of the Green Belt would be detrimental to the landscape setting of Larbert and Stenhousemuir. The committed development at Bellsdyke / Hill of Kinnaird provide a long term framework for growth in Larbert and Stenhousemuir.

Main Issue 7: Employment Land

Cala is aware that the Bellsdyke Consortium is submitting a separate objection to the continued allocation of a business park within the Bellsdyke / Hill of Kinnaird site (on the basis that the site is not currently required to support the future growth of the local economy, as there is no current demand for this use). Cala will consider the option of accommodating this allocation within the Hill of Kinnaird 3 site, which offers the equivalent site and the option of this allocation not being deleted but rather phased into a later stage of development.

Council response: Comments noted. The Business Park was a requirement of the outline planning consent and the Planning Brief for the Bellsdyke Area. It is not accepted that it should be phased into a later stage of development.

L&S/B Larbert and Stenhousemuir Potential New Sites

Cala support further expansion of housing into Hill of Kinnaird 3 (L&S/B/05) for the following reasons:

1. A masterplan can be developed to integrate sites to work as a single community
 2. A more efficient road layout can be achieved
 3. The business park currently allocated at Hill of Kinnaird with no developer interest can be accommodated at Hill of Kinnaird 3
 4. Will provide continued support for local community and economy, assisting in the success of the proposed Kinnaird Village.
 5. A long lead in time in order to consider the best means of addressing education constraints at Larbet High School
- The planned development at Hill of Kinnaird 3 provides an opportunity to resolve the education constraint at Larbert High School. The long lead in time would ensure a focused, co-ordinated approach at resolving this issue rather than excluding development entirely. In addition, the revision of catchment boundaries proposed in 2009/10 could be re-examined.

Council response: This site has not been identified as a housing proposal in the Proposed Plan, as the principle of development at Hill of Kinnaird 3 is not accepted.

00205 **Callaghan Danny**

Comments: 4

Main Issue 2: Sustainable Housing Locations

The Council's preferred sites for housing growth in the Polmont Area are in locations which will provide the developer with the highest prices and therefore the highest profits. As an alternative it is suggested that housing in the Braes areas should be directed to Slamannan, where the local community is thought to welcome regeneration. Another alternative suggested for housing is Gilston Park which would then give direct access to the motorway network and could share the facilities being planned for Whitecross and make the Whitecross development more viable. Since 1999 significant housing growth has taken place in the Reddingmuirhead and Wallacestone areas causing significantly increased pressure on: the local road network which has now reached capacity; car parking at Polmont Station which is now over capacity; local primary and secondary schools which are now full; and the local health centre which is currently at capacity. In addition this development has caused significant loss of local green space and a coalescence of individual settlements and communities leading to a loss of local identity. Development of sites POL/B/13 and 17 is considered unacceptable due to: their huge size which will swamp a very small community of Wallacestone which has no facilities; the local road network does not have the capacity to accommodate the scale of development; the local primary school does not have the capacity to accommodate development of this scale; and it would remove vast tracts of open countryside.

Council response: Additional housing growth in the Polmont area has generally been scaled down in the Proposed Plan compared to the MIR, with the removal of sites at Middlerigg Farm, Reddingmuirhead and Sunnyside Road. No further housing growth is proposed to the south of Brightons. The sole remaining focus for additional growth is East Maddiston. Gilston is not favoured for additional housing because of its primary economic development role.

POL/B Polmont Potential New Sites

Development of the Middlerigg site (POL/B/05) is not supported as: it will further merge the villages of Reddingmuirhead and Wallacestone; it is likely to be developed for more than 200 houses; it is subject to flooding and is also heavily undermined by old coal workings; it will lead to a loss of ecologically important land which is known to be used by badgers; it will sever a green corridor; the local road network does not have capacity to accommodate the scale of development which will lead to increased congestion; and children from this site would have to travel to Shieldhill Primary as Wallacestone Primary is full, therefore creating more traffic and older children would have to travel into Falkirk as the Braes High School is full to capacity.

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

POL/B Polmont Potential New Sites

Development of the Sunnyside Road site (POL/B/15) is not supported as: development would result in the joining of Wallacestone to Rumford therefore joining villages; the immediately adjacent school Wallacestone is full and has no room to expand; and it will further increase traffic onto the B805 at an already dangerous junction close to Quarry Brae. Notwithstanding the above development of this site could provide a new footpath and some road improvement on Sunnyside Road which is seen as advantageous.

Council response: The site is not identified as a housing proposal in the Proposed Plan, in recognition of issues over effectiveness and education capacity.

SHIE/B Shieldhill Potential New Sites

Development of the site at Hillcrest Farm, Shieldhill (SHIE/B/02) is not supported on grounds of road safety, joining of communities, and destroying wildlife habitats. It is also considered that a capacity of 30 new houses is an underestimate of the true capacity of the site.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

00865 Cameron Vanessa

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of Sunnyside Road, Rumford (POL/B/15) as a preferred site. The volume of traffic on Sunnyside Road has resulted in serious road safety issues. Additional growth in the area will destroy the semi-rural character of the area. There are school capacity issues, particularly at Wallacestone Primary. There are also health centre capacity issues.

Council response: The site is not identified as a housing proposal in the Proposed Plan, in recognition that there are effectiveness and school capacity issues associated with it.

00829 Carmichael and Sharon Harley Martin

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of the village. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure (particularly sewerage, transportation and education) will not be able to cope with the scale of development envisaged on all of these sites. Development of this scale will also erode the local sense of community.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00735 Carronvale Homes

Comments: 4

B&B/B Bonnybridge and Banknock Potential New Sites

The allocation of Glasgow Road 1, Dennyloanhead (B&B/B/04) as a preferred site is supported. This is a logical extension to the sites along Glasgow Road. The site can be accessed through the adjacent site and is considered to be fully effective. Shared equity would also be available.

Council response: The site has not been included as a site for housing growth in the Proposed Plan. The A803 sliproad junctions with the M80 at Banknock and Haggs which are planned to be upgraded to accommodate committed growth along the A803 corridor between Coneypark and Dennyloanhead are not planned to be upgraded with enough spare capacity to accommodate the development of this site. Planning a further upgrading of capacity of this sliproad junction so soon after the currently planned upgrade is not considered to be appropriate due to the disruption this would cause, so this site is not considered to be appropriate for development in the 2014-2024 period but could become a viable long term growth option.

Authority Response to Contributions by Contributor for FLDP_MAINGRA/C Grangemouth Amended Use Sites

The site at Wood Street, Grangemouth (GRA/C/01) should be allocated for housing. Additional housing land will be required as a number of sites in the adopted Local Plan are constrained. The site at Wood St is owned by a house builder and is capable of being developed without significant infrastructure costs. Shared equity would also be available. The site is not constrained by the consultation zones as it lies partly within the middle and outer zones. There is a shortfall of housing land in Grangemouth and the population has declined. The removal of the economic development allocation of the site indicates that there is an over supply of industrial land in the area and there is government support for the redevelopment of brownfield land. The recent consent on part of the site for 30 units recognised this.

Council response: The eastern part of the site has been identified as a housing proposal in the Proposed Plan, reflecting the Council's 'minded to grant' decision on the planning application. The remainder of the site would be subject to proposed Plan Policy BUS03 which is industrial land with potential for redevelopment. This would give flexibility for residential use, but only subject to satisfying other relevant policies, particularly BUS05 on Major Hazards.

SHIE/B Shieldhill Potential New Sites

The site at Belmont Avenue, Shieldhill (SHIE/B/01) should be allocated for housing. A generous housing supply should be provided with additional sites allocated which are effective and unconstrained. This site is owned by a housebuilder and its development is financially viable. Shared equity would also be available. It is also capable of contributing to a local shortfall in open space provision with a significant part of the site being available for public open space.

Council response: The site has not been identified for development in the Proposed Plan, but is designated as open space. It is an important piece of open space for the community, forms an important part of the green network and is an important wildlife corridor.

STA/B Standburn Potential New Sites

The site at Standburn South (STA/B/010) should be allocated for housing. A generous housing supply should be provided with additional sites allocated which are effective and unconstrained. This site is owned by a housebuilder and its development is financially viable. Shared equity would also be available. The local school is operating under capacity and new housing will help to ensure the school remains viable. The Structure Plan identifies Standburn as a key village for rural regeneration however the site allocated in the local plan for housing is not considered to be effective compared to this site which is in single ownership and capable of coming forward in the near future.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. Its scale is considered excessive in relation to the size of Standburn, and it does not integrate well with the existing form of the village. There would be significant impacts on the landscape and on the setting of the village.

00790 Central Demolition Ltd

Comments: 1

B&B/B Bonnybridge and Banknock Potential New Sites

A site at Broomhill Road, High Bonnybridge should be allocated for residential development.

Council response: The site is not considered appropriate for development due to landscape, archaeological and infrastructure issues.

00335 Central Scotland Forest Trust

Comments: 6

Main Issue 5: Green Belt

CSFT broadly supports Falkirk Council's preferred option for the green belt. Whilst the rationale for removal of a section to the east of A905 is understood, there are reservations about its protection from development in the future, especially with regard to small scale/sporadic development which may over time erode the landscape setting of this flat area.

Council response: Comments noted

Main Issue 9: Strategic Access and Sustainable Travel

CSFT recognises the current commitment to developing strategic road improvements through NPF2. However, active travel is also reflected in NPF2 through the Central Scotland Green Network. Substantial improvements to the outdoor access network have been achieved in recent years, with a number of other key opportunities identified that could significantly contribute to the active travel agenda. We would therefore welcome a strong emphasis/commitment to developing and maintaining active travel and outdoor access opportunities in the Falkirk area through the LDP.

Council response: Proposed Plan policy INF07 provides for improvements to cycling and walking infrastructure and the promotion of the core path network. There are 32 opportunities identified in the Proposed Plan for green network improvements, many of which have an active travel component.

Main Issue 10: Climate Change

CSFT supports the recognition in Figure 5.1 of the important contribution of woodland management/expansion and protection of carbon rich soils to carbon storage. However, we would also seek recognition of the contribution that woodland management/expansion can make to Flood Risk Management. CSFT encourages recognition of the contribution that appropriate woodland and habitat management/expansion can make in catchment flood management and water quality (both rural and urban areas) within any update of existing policies and strategies relating to this issue. The revised Central Scotland Forest Strategy will expand its current policy coverage to emphasise the role of the Central Scotland Forest in contributing to sustainable management of the water environment, particularly in the context of climate change adaptation and responding to the current projected flood risk. As such, we recommend read across between the LDP and the CSF Strategy.

Authority Response to Contributions by Contributor for FLDP_MAIN

Council response: The priorities of CSFT are highlighted in both the Strategic Objective and Vision and within Green Network policies. Specifically, Policy GN04 of the Proposed Plan recognises the importance of trees, woodland and hedgerows, and the supporting text makes reference to the role of trees/woodland in flood management.

Main Issue 10: Climate Change

On decarbonised energy generation, CSFT would encourage inclusion of Green Network as a Relevant Main Issue under this heading in Figure 5.1. The GN could contribute to providing a locally available fuel resource for renewable energy production. CSFT supports Falkirk Council's Preferred Option for renewable energy. We would encourage consideration within the proposed "Spatial Framework for Wind Energy Development" of constraining such developments within woodland areas due to potential long term losses of carbon storage that woodlands can provide.

Council response: Comments noted. De-carbonised energy generation is identified in the Strategic Objectives (fig 2.2)

Main Issue 12: The Green Network

The revision of the CSF Strategy will outline delivery opportunities of the CSGN within the Forest area. This will include as an important element the management and expansion of the woodland resource to develop forest networks. However, the importance of managing/developing other habitats as part of the GN is also recognised and encouraged, along with active travel/outdoor access, climate change, sustainable soil management etc. These all contribute to development of an integrated, multi-functional GN. As such, the CSF Strategy will help support ongoing delivery of the CSGN in its wider meaning in the Falkirk Area, and as such we encourage strong read across between the revised CSF Strategy and the LDP. We query the short to medium term effectiveness of development sites offering opportunities for development of integrated green infrastructure in the present economic climate. We suggest consideration of temporary greening of identified priority "stalled spaces" as a mechanism to prevent the detrimental effects of dereliction (environmental/social/economic). This can allow identified gaps in the spatial distribution of public/green/open spaces to be addressed through providing new sites for under-represented open space typologies or through joining up fragmented typologies to develop more coherent green networks. These networks can also provide the setting for cycling and walking routes contributing to active/sustainable transport networks with urban areas, Stalled spaces delivering community and environmental benefits through temporary greenspace.

Council response: Comments noted. It is considered that the policy framework within the Proposed Plan will be supportive of proposals for the temporary greening of stalled spaces and that there is no need to formulate a distinct policy which encourages this or any need to identify priority "stalled spaces".

Main Issue 12: The Green Network

The habitat specific policies on woodland for inclusion in LDP could be informed by:

1. The revised Central Scotland Forest Strategy and its related "Local Forest Framework". Discussions have already been held with Falkirk Council officers and Forestry Commission Scotland as to how this could be adopted to serve as a Forest and Woodland Strategy for Falkirk, providing a broad framework for new woodland planting and delivery of multifunctional green networks across the Council area; and

2. A woodland strategy (as expansion/revision to Falkirk Urban Woodland Strategy/Woodland Framework) This could be used to identify priority woodland management and expansion (PEA) sites; help inform Falkirk Council strategies; the LDP process though implementation of CSGN; and wider biodiversity and sustainability objectives including climate change/flooding.

Council response: Comments noted. The Proposed Plan does not contain any habitat specific policies on woodland in relation to new woodland planting although woodland expansion will be promoted through several distinct green network opportunities and as part of the delivery of some development opportunities. The Council is currently in the process of preparing the Falkirk Greenspace Strategy which will supersede the current Urban Woodland Strategy. The revised Central Scotland Forest Strategy and its related "Local Forest Framework" will be used to inform this new Strategy.

00261 Chartmount Land Holdings

Comments: 1

RUR/B Rural Area Potential New Sites

The site at Haroldstoun/Darnrigg Moss (RUR/B/03) should be identified for Low Density Rural Housing (self build plots) with a key objective to improve and enhance the degraded landscape. A maximum of 50 new house plots would act as enabling development to fund wider landscape, habitat and recreation opportunities over the major part of the site and create opportunities for small scale rural business and rural diversification. This approach reflects SPP which supports opportunities for small scale housing development in rural areas and also the MIR and CSGN.

Council response: The site has not been identified for development in the Proposed Plan. Its relatively remote and isolated location in the open countryside is not a sustainable one in terms of transport and access to existing infrastructure and services. The strategy for the Rural South area is to focus development on the existing villages.

00878 Chemical Cluster Companies

Comments: 4

Main Issue 7: Employment Land

The Chemical Cluster Companies (CCC) are of national economic significance and Falkirk Council should strengthen its planning policies to prevent the encroachment of sensitive land uses close to CCC sites. The Review Board decision to grant consent for housing at Wood St is referenced as an example of how the PADHI system can be manipulated and planning policies must be robust enough to prevent similar situations occurring. The site has not been adequately marketed for employment land and evidence submitted on land take up by CalaChem shows that there is a healthy take up of land in the

Authority Response to Contributions by Contributor for FLDP_MAIN

area. The Wood St site should therefore continue to be safeguarded for business uses. The support of the petro chemical and chemical sector is welcomed however it is considered that the integrity of the complex of sites is threatened by inappropriate sensitive land uses being allowed nearby. It is considered that the existing major hazard policies should be strengthened in liaison with the HSE for residential development in particular. In relation to Technical Report 5, para. 2.2 should refer to all 4 chemical companies in the CCC. Given the reference to the chemical companies' importance and the work being carried out by Scottish Enterprise and others at para. 4.39, it is essential that the Council strengthens its policies to prevent inappropriate development close to CCC sites. In Appendix 3 the Grangemouth Chemical Cluster should also be listed as a key industrial area. The removal of Wood Street as an economic opportunity site is again strongly objected to.

Council response: The Proposed Plan identifies a small site at Wood Street as a housing proposal in recognition of its 'minded to grant' planning application status. The remainder of the site is identified under policy BUS03 as a business area with potential for redevelopment, in common with other business land in Wood Street and Dundas Street. Policy BUS05 provides the policy advice for development proposals in the vicinity of hazardous installations and for consents which would extend hazard consultation distances. The Spatial Strategy includes the Grangemouth Chemical Cluster as a Strategic Business Location in recognition that the petrochemical and chemical sector remains strong and presents good opportunities for growth over the plan period.

Vision

The Chemical Cluster Companies (CCC) are of national economic significance and Falkirk Council should strengthen its planning policies to prevent the encroachment of sensitive land uses close to CCC sites such as the recent review board decision at Wood St. Planning policies should be designed to ensure that development such as housing adjacent to a chemical complex should not occur.

Council response: The vision is supportive of the continuing role of the chemical companies and the spatial strategy includes the Grangemouth Chemical Cluster as a Strategic Business Location. The recent 'minded to grant' decision at the eastern end of Wood Street is reflected in the Proposed Plan. The remainder of the land is an industrial area with potential for redevelopment, and will continue to be subject to the policy on Major Hazards and the the HSE's PAHDI advice.

Main Issue 2: Sustainable Housing Locations

It is agreed that there should be no additional housing allocation for Grangemouth in view of development constraints and it is noted that there is a negative affordable housing requirement in the town. Any redevelopment of existing housing stock should not lead to development being closer to major hazard sites. The preferred option would be for the urban limit to be extended with opportunites at Skinflats with the removal of the Green Belt designation and at Gilston.

Council response: Any additional windfall housing developement in Grangemouth would be considered within the context of BUS05 and it is not considered appropriate to allocate further land to the north of Grangemouth at Skinflats which is also potentially constrained by flooding risk and the green belt. Glston continues to be allocated as a strategic employment site.

Main Issue 10: Climate Change

The Chemical Cluster Companies (CCC) are of national economic significance and it is essential that the Council is mindful of the economic implications of sustainability requirements on business competing in a global market. The CCCs are committed to the implementation of sustainable practices in line with the Chemical Industries Association committment. The cumulative cost of climate change for companies is likely to add significantly to their energy bills and sustainability must be affordable. The prioritisation of measures to address flood risk is welcomed.

Council response: The Council will seek to ensure that all new development seeks to reduce carbon emissions and incorporates renewable energy technology. The Proposed Plan specifies that a minimum 10% of the mandatory carbon reduction standard as set out in the Building Regulations is to be met by the installation and operation of renewable technologies. It is considered that this approach will enable Scottish Government requirements to be met but also allow businesses sufficient flexibility.

New flood defences in Grangemouth are set out in the Proposed Plan and are identified in NPF2. New policies and SG will set out guidance for all new development, and development in floodplains and other vulnerable areas.

00895 **Clark G H**

Comments: 1

MUR/B Muirhouses Potential New Sites

The preferred site at Muirhouses (MUR/B/02) should not be allocated. The area is an attractive area of countryside for walking and would be spoiled. Traffic in the village is already a problem, and development would make it worse.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. Further assessment suggests that there will be substantial impacts on trees and hedgerows which would have an adverse impact on the setting of the village and Carriden Estate. Public consultation has raised concerns about traffic issues on Carriden Brae.

00879 **Colin Potter and Clive Cooke**

Comments: 6

Vision

Agree with the Council's preferred vision for the LDP.

Council response: Support welcomed.

Authority Response to Contributions by Contributor for FLDP_MAINMain Issue 1: Housing Growth

The Council's preferred option of medium housing growth is reasonable and realistic but this approach needs a degree of inbuilt flexibility which allows an increase in housing completion rates in response to market conditions.

Council response: Comment noted. A flexibility allowance has been built into the provision of housing land.

Main Issue 2: Sustainable Housing Locations

The Council's preferred option for sustainable housing locations in Bonnybridge and Banknock is supported.

Council response: Comments noted. The A803 sliproad junctions with the M80 at Banknock and Hags which are planned to be upgraded to accommodate committed growth along the A803 corridor between Coneypark and Dennyloanhead are not planned to be upgraded with enough spare capacity to accommodate significant additional development beyond that already committed to as part of the Falkirk Council Local Plan. Planning a further upgrading of capacity of this sliproad junction so soon after the currently planned upgrade is not considered to be appropriate due to the disruption this would cause, so significant additional housing development along the A803 over and above that already committed is not considered to be appropriate for development in the 2014-2024 period but could become a viable long term growth option.

Main Issue 3: Housing Need

The Council's preferred option for housing need is supported. In the current economic climate a flexible approach must be taken to affordable housing requirements to avoid the viability of development being compromised.

Council response: Comment noted. SG supporting Proposed Plan policy HSG02 Affordable Housing takes a flexible approach to provision.

Main Issue 4: Infrastructure for Growth

The Council's preferred option for infrastructure for growth is supported. Developer contributions require to be proportionate and to meet the requirements of Circular 1/2010.

Council response: Supportive comment noted. Proposed Plan policy INF2 and related SG concerned with developer contributions highlight need for S75s to comply with the provisions of Circular 3/2012.

B&B/A Bonnybridge and Banknock Committed Sites

The site at Coneypark (B&B/A/06) should be allocated for housing in the LDP as it is effective and suitable for a housing development of 20 units.

Council response: This site has not been carried forward into the proposed plan as an opportunity for housing growth due to concerns over its effectiveness in the 2014-2024 period. This site has been available for development since its inclusion in the Bonnybridge and Banknock Local Plan 2nd Edition of March 1982. Since that time over 30 years have passed and no development has come forward. Nevertheless the site remains within the urban limit so its removal as an opportunity for housing growth will not prevent proposals for housing development on the site being considered favourably.

00890 **Cook Gordon**

Comments: 2

Main Issue 2: Sustainable Housing Locations

Development of housing on sites POL/B/2,3,13,15 & 17 is not supported. Local infrastructure (particularly roads, education and healthcare) will not be able to cope with the scale of development envisaged on all of these sites to the detriment of road safety.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

Main Issue 1: Housing Growth

The validity of household projection figures is questioned particularly whether a projected increase in households of approximately 19,000 households will lead to a corresponding population increase of approximately 20,000. A higher population increase of approximately 42,000 is suggested to be more accurate.

Council response: The figures are taken from the Housing Needs and Demand Assessment (HNDA). The population figure is lower than the respondent expects because of average household sizes continuing to fall over the period of the plan.

00815 **Craig Stewart**

Comments: 1

AIR/B Airth Potential New Sites

The Forthview golf range site to the south of Airth should be considered as an allocation for affordable housing in the PP. It forms a natural gateway to the village and does not suffer from flood risk, unlike other sites in the area. The site could also be used to house a new school for the village and so could form a mixed housing/school site.

Council response: The site at Forthview Golf Range has not been identified as a housing proposal in the Proposed Plan. Development of this site would represent further southward extension of the village along the A905; the site is currently detached from the nearest built up area. School capacity constraints are still significant in Airth, in terms of both Airth PS and Larbert HS, and it is considered necessary to limit further growth of the village accordingly. Growth in this location may have an adverse impact on the settings of Airth Castle and Old Airth Parish Church, and allocation of a small site at the north end of the village is preferred over this one.

00904 **Craigrossie Properties**

Comments: 1

Main Issue 2: Sustainable Housing Locations

Craigrossie Properties are seeking the inclusion of land at Greenwells Farm . The proposed site forms the northern part of POL/B/2, and excluded the land south of California Road. This was to address the concerns raised by the Reporter as part of the 2009 Local Plan Inquiry in terms of landscape impact. Craigrossie Properties have supplied a suite of information relating to landscape, ecology, transport and policy. They considered the site to be effective.

Council response: It was not considered appropriate to include this site in either the MIR of the Proposed Plan. The site has relatively low accessibility and development of the site would have significant landscape impact. There are also capacity issues at Maddiston PS limiting the overall scale of growth in the area, and it is considered that the Strategic Growth Area at Parkhall East is a more suitable group of sites in terms of overall masterplanning, and addressing impacts on key infrastructure such as roads and primary school capacity.

00797 **Crawford Senga**

Comments: 1

RUR/B Rural Area Potential New Sites

It would be good to see the redevelopment of the community again at Blackbraes (RUR/B/02).

Council response: No allocation has been made at Blackbraes in the Proposed Plan. The site is located in the countryside outside the boundary of existing settlements and its development would be considered to be unsustainable due to the distance from existing services. The site furthermore does not correspond with the footprint of the former community at Blackbraes. Allocated sites in the wider Rural South area are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

00853 **Dart Energy (Europe) Ltd**

Comments: 1

Main Issue 14: Waste and Minerals

National policy seeks to encourage the extraction of unconventional gas as part of a strategy for cleaner coal technology. The LDP should recognise the importance of this energy resource and address the full range of onshore oil and gas extraction. Given the incremental and long term nature of coal bed methane (CBM) exploration and production support within the LDP is essential. The continuation of existing mineral policies is not supported as these policies do not adequately deal with onshore oil and gas. The existing local plan does not provide necessary guidance and an explicit policy framework is required. This should recognise CBM and other forms of onshore oil and gas as source of national energy production. The alternative option of taking a more liberal approach to minerals extraction is supported and the PEDL licences should be reflected in LDP policy and supporting text including safeguarding licence areas. Reference is made to minerals policy in England (MPS1) which requires minerals authorities to identify coal reserves and CBM licence areas. It is also possible that the working of coal seams for CBM could also contribute to carbon capture as part of the process of methane release. Suggested supporting text and a policy on unconventional gas is proposed.

Council response: The proposed plan acknowledges the potential for coal bed methane and PEDL licence areas are also identified on Map 5.1. It is considered that policies RW02 and RW03 which cover minerals and onshore oil and gas extraction provide an appropriate framework for proposals to be assessed.

00378 **Denny and District Community Council**

Comments: 1

DEN/B Denny Potential New Sites

This site at Northfield Road (DEN/B/04) has been promoted previously for development and the local community objected in force, and a Local Public Inquiry was held. The local community want this site allocated as 'green space' in the LDP.

Council response: The Proposed plan does not identify the Northfield Road site as a housing proposal. The site is identified as urban open space, protected by Policy INF03.

00643 **Directorate For The Built Environment**

Comments: 14

Main Issue 1: Housing Growth

Scottish Government are content with the approach of the MIR which demonstrates a commitment to increasing housing supply, with a medium growth assumption. In the first 10 years, 29% above the medium growth level has been allowed for - this additional land requirement should provide a welcome level of generosity and address issues around land supply and deliverability. It is recognised that the preferred 'medium growth' option will provide a good geographic spread across the Housing Market Area. The phasing for the second 10 years is not as clear. The preferred option indicates that if a sufficient flexibility allowance was provided, then there would be opportunity to deliver on the HNDA targets, market conditions permitting. This is a reasonable approach at this stage with this first LDP.

Council response: Support welcomed. The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period. This means the flexibility allowance has been reduced, but the supply itself is more robust. In terms of longer term allocations, a proportion of the larger allocated housing sites will deliver beyond 2024. Subsequent LDP reviews will bring forward further sites, as and if required.

Main Issue 2: Sustainable Housing Locations

In relation to the Bo'ness Foreshore (BNS/A/08) commitment, clarification is sought over the deliverability of the site within the period up to 2024. If the deliverability is uncertain within this timeframe, the Council should confirm whether alternative locations will be sought for the current allocation. Scottish Government strongly recommend the new policy on Control of Woodland Removal be addressed through the PP and Supplementary Planning Guidance where relevant, particularly in relation to housing developments. Scottish Government also emphasise the need to appraise the impact of housing growth

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on strategic transport infrastructure. Should interventions be identified as necessary these should be identified within the Proposed Plan (PP) and a suitable contribution mechanism to deliver these should be identified in the PP, Supplementary Guidance and Action Programme as appropriate.

Council response: The Proposed Plan identifies Bo'ness Foreshore as a long-term housing proposal for the 2024-34 period. The capacity of other new sites in Bo'ness has been increased to compensate for the loss of effective land at the Foreshore in the first period of the plan. The Scottish Government new policy on Control of Woodland Removal is highlighted in the supporting policies section of the Proposed Plan covering Trees, Woodland and Hedgerows. Revised Technical Report 4 contains a transport appraisal of new housing sites. Appendix 1 sets out the requirements for developer contributions from sites whose development will impact on the strategic transport network.

Main Issue 3: Housing Need

The affordable housing numbers appear to be evidence based, extracted from the HNDA. Scottish Government anticipate the Council will wish to take a pragmatic approach to deliverability, in light of the economic climate and the Chief Planner's letter of March 2011. Scottish Government advise that while the issue of housing for older people is not specifically mentioned in the MIR. It should be borne in mind in the development of the Proposed Plan.

Council response: The SG supporting policy HSG02 Affordable Housing adopts a flexible approach to affordable housing delivery. The policy thrust of the Local Housing Strategy in catering for the elderly is to adapt residents' housing in situ rather than provide new build accommodation. However the Proposed Plan, through policy HSG09, makes specific provision for residential care homes.

Main Issue 4: Infrastructure for Growth

Scottish Government support the approach of the preferred option detailed within the MIR, to promote modest growth and minimise the need for large scale infrastructure requirements over and above existing planned upgrades. The Council's moves to look at creative and innovative methods of funding for infrastructure is also supported. The PP or Supplementary Guidance should take the opportunity to set out proposed models for the funding and delivery of identified infrastructure and seek to engage the development industry in that process. Scottish Government are content with the preferred approach towards water and drainage and support the MIR's recognition of the importance of green infrastructure.

Council response: Supporting comments noted. Proposed Plan policy INF01 Strategic Infrastructure makes provision for the Council to explore traditional and innovative funding mechanisms to secure the provision of infrastructure.

Main Issue 5: Green Belt

Overall the approach to green belt is very good and follows the requirements set out in SPP. The prominence given to green belt as a main issue is welcome, with clear maps.

Council response: Support noted.

Main Issue 6: The Countryside

Scottish Government support the preferred option on development in the countryside, and the Council's recognition of the benefits of taking a flexible approach to supporting opportunities for housing in rural areas, subject to the achievement of high quality design.

Council response: Support noted.

Main Issue 7: Employment Land

Scottish Government comment on specific site options:

1. Lochlands: this option is likely to have a significant impact on the historic environment.
2. Klondyke: this option is within Frontiers of the Roman Empire (Antonine Wall) world heritage site (WHS) buffer zone and any transport impacts on J5 of M9 would have to be appraised
3. Rough Castle and Kinneil: Council should liaise with Historic Scotland on their proposed role as tourist nodes

Council response: The Proposed Plan highlights the constraints on development at Lochlands and Beancross/Klondyke in relation to the historic environment. No specific proposals at Kinneil or Roughcastle are set out in the Proposed Plan but Policy BUS01 sets out the requirements on any proposal which comes forward for these locations. The Council will fully involve Historic Scotland as a consultee should proposals come forward.

Main Issue 8: Town Centres and Retail Provision

Scottish Government support all the preferred options for policy on Falkirk Town Centre, district and local centres and Falkirk Gateway. It is positive that the preferred option promotes diversity but more could be said on use-class flexibility to allow a mix of commercial/ leisure/small business.

Council response: Support noted.

Main Issue 9: Strategic Access and Sustainable Travel

Scottish Government welcome the identification of strategic access and sustainable travel as a main issue and the statement that key infrastructure schemes need to be identified within the PP. There are no Scottish Government plans to relocate M9 junction 6 but it is understood that this may potentially be delivered as part of the TIF proposal. At M9 Junction 5 (Cadgers Brae) the suggested widening of local roads in the medium term is of potential concern to HS as Junction 5 is on the line of the Antonine Wall.

Scottish Government welcome the idea that bus service enhancements or other sustainable transport solutions might be employed in the wider consideration of access to Bonnybridge, Grangemouth or Laurieston as an alternative to new station

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proposals.

Council response: Supportive comments noted. The issue of impact on Antonine Wall, of concern to HS, is highlighted in the site schedule relating to Proposed Plan proposal INF03 M9 junction 5 improvements. Proposal INF02 M9 Junction 6A is included in the plan because the provision of south-facing slips to create a full 4 way junction at M9 Junction 6 is explicitly set out in Intervention 20 within the Scottish Government's Strategic Transport Project Review. TIF resources are intended to cover only the interim junction upgrade measures included in proposal INF01.

Main Issue 10: Climate Change

Scottish Government consider that the MIR's coverage of climate change is better than many other MIRs so far. Figure 5.1 on the 'Interface of Climate Change with the MIR' is useful in consideration of linkages. But we would have preferred a stronger climate change presence across policy areas and more specific reference in the vision.

Low Carbon

Promoting decentralised energy production and developing local heat networks is a national action in NPF2, with planning authorities a lead partner, so this should be addressed within the PP. The Council can use heat mapping to identify communities with high potential (e.G. High heat density) and areas of high resource (e.G. Existing and new forests and sawmills for biomass, sources of waste heat) but it is not apparent whether the Council is considering proposals for better heat recovery in the area, e.G. Excess heat from large industrial operations or brewery or distillery sites. It is good to see that there is early mention of the section 72 policy requirement. However, the rising proportion aspect of the policy requirement is not addressed so needs to be considered going forward to the PP. Scottish Government support the identification of 'protection and management of existing woodland' and 'creation of new woodland' as key areas of interface with Carbon Storage measures

Renewable energy

Technical Report 8 is an excellent platform for further work on renewables. The MIR only references electricity and renewable heat targets - the PP should also recognise the new 500MW community renewables target.

Flood risk

SG welcome the MIR's references to flood risk and welcome the preferred option's commitment to prioritise measures to address flood risk in Grangemouth, which will contribute to the Grangemouth Freight Hub national development.

Council response: Comments noted. Vision now has additional emphasis on Climate Change. Climate change is also an overarching theme across policy areas within the Proposed Plan including Sustainable Design Principles, transport policies and policies relating to resources and waste.

Main Issue 11: Design Quality and Place Making

Scottish Government expect the PP to promote good placemaking and recommend the PP requires design based masterplans for the housing sites. It is important that any supplementary guidance and proposals are consistent with all the policies in Designing Streets, rather than 'cherry picking' particular elements. Reference could be made in the PP or supplementary guidance to the importance of placemaking also in mixed-use or business allocations. Cognisance should also be taken of the recent Scottish Government guidance on Green Infrastructure: Design and Placemaking, and its role in site masterplans.

Council response: Comments noted. The Scottish Government's Green Infrastructure guidance is referenced in Figure 5.3 within the Proposed Plan.

Main Issue 12: The Green Network

Scottish Government strongly support the development of a Green Network for Falkirk that is intended to complement the growth strategy. The components of the green network have been well considered and articulated. A design based masterplan approach will be crucial to integrating the green network within development proposals and securing its delivery. Scottish Government welcome that the Council has identified the current major developments in the area and the green network opportunities. Historic Scotland considers that there is an opportunity to link the development of the green network with potential enhancement of the historic environment. E.G. The canals and the Antonine Wall, battlefield management plans, improving the understanding of the industrial heritage of the area. The CSGN Development Fund is currently inviting applications for funding, which may provide opportunities to advance the green network defined in the plan.

Council response: Comments noted. Policy GN01 "Falkirk Green Network" of the Proposed Plan indicates that new development, and in particular the strategic growth areas and strategic business locations, should contribute to the green network, where appropriate, through the integration of green infrastructure into masterplans or through enabling opportunities for green network improvement on nearby land.

Main Issue 13: Cultural Heritage

Scottish Government welcome the proposed introduction of a policy on enabling development. It should be in line with the guidance in SHEP, SPP and the Managing Change in the Historic Environment guidance note. Consideration should be given to the appropriate mechanisms to define the conservation deficit that the enabling development is to address, and whether the enabling scheme could be implemented elsewhere within the LDP area. HS notes that the discussion under this heading refers to the built heritage strategy document 2006 - 2010, which may have to be renewed. HS is content with the proposal to carry forward the existing cultural heritage policies, with the addition of an appropriate policy for managing change within Inventory battlefield sites and for the identification and future management of non-Inventory gardens and designed landscapes. HS provide a number of site specific comments in an appendix to the response.

Council response: Comments noted.

Main Issue 14: Waste & Minerals

Scottish Government note the Council's preferred option is to safeguard land for a potential extension to Avondale landfill site, and has recognised regional share. The shortfall (in capacity) across the regional area needs to be addressed with partner authorities. There is a need to clarify if the terms of SPP's landbank requirement are being met. PP policy should include a recommendation for operators to consider after uses that result in environmental improvement, rather than restoring land to its previous state (SPP para 235).

Council response: The comments are noted. It is anticipated that there will be a gradual reduction in waste going to landfill in line with the Zero Waste Plan and existing landfill capacity for the Forth Valley area currently exceeds the Zero Waste Plan capacity requirements. The existing hard rock quarries are considered to provide an adequate landbank for the local market area and no further workings are proposed. The requirement for the restoration of mineral sites which secure improvements for the green network is identified in policy.

00836 **Donachie Andrew**

Comments: **4**

Main Issue 2: Sustainable Housing Locations

The Council's preferred option would have an adverse impact on Braes High School and Wallacestone Primary School both of which are near capacity. It would also have an adverse impact on the local road network which is currently very narrow and congested and would increase capacity pressures at Polmont Station to the detriment of road safety.

Council response: There are no new sites identified within the Wallacestone PS catchment. The sites at Sunnyside Road and Middlerigg, which were preferred sites in the MIR, have not been carried forward into the Proposed Plan.

POL/B Polmont Potential New Sites

Development of the Middlerigg site (POL/B/05) is not supported as it would remove the boundary distinction between the villages of Reddingmuirhead and Wallacestone. No allowance for has been made for the impact on the local High School nor on other local infrastructure. Local roads are already subject to congestion and parking difficulties which the development of this site would exacerbate.

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

POL/B Polmont Potential New Sites

Development of the Sunnyside Road site (POL/B/15) would have an adverse impact on the local Primary School or High School which are already near capacity. In addition the local road network will have difficulty coping with the further traffic that more houses would place on it to the detriment of road safety.

Council response: The Sunnyside Road site has not been identified as a proposal in the Proposed Plan.

POL/C Polmont Amended Use Sites

The Gilston site (POL/C/01) site offers greater potential for housing given the proximity to a decent road network.

Council response: The Gilston site remains allocated solely for economic development uses in the Proposed Plan.

00798 **Dormont Estate**

Comments: **3**

Main Issue 3: Housing Need

The preferred option for affordable housing of a two tier quota system for all sites over 20 units is supported.

Council response: Comment noted.

Main Issue 7: Employment Land

The approach to employment land and the employment sites proposed are supported.

Council response: Support noted.

FAL/B Falkirk Potential New Sites

A site at Smith Street, Falkirk has potential for redevelopment for housing. The boundary of the policy allowing redevelopment of industrial land should be extended to Smith Street to cover the site.

Council response: The site has been included within a business/industrial area with potential for redevelopment in the Proposed Plan.

00989 **Duncan Lynda**

Comments: **1**

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00348 **Dunsmore Martin**

Comments: 11

Main Issue 2: Sustainable Housing Locations

Agree with housing growth, but there are also derelict land and housing/garage sites in St Crispin's Place area which could be cleared.

Council response: Comment noted. Use of brownfield land for housing has been maximised. Proposed Plan allows for brownfield windfall sites to be developed for housing as they come forward during the plan period.

Main Issue 3: Housing Need

All sites should have affordable housing provision if over 5 units.

Council response: The site size threshold recommended by Scottish Government has been 20 units and Falkirk Council decided to adopt this threshold. Experience around the country has shown that smaller thresholds result in very small affordable housing requirements which developers have not delivered. In Falkirk Council area land for affordable housing is the greater need and therefore on-site provision is far preferable to commuted sums.

Main Issue 5: Green Belt

Agree with general approach to green belt, but there is no harm in merging towns if there are paths and pleasant walking routes between amenities and homes.

Council response: Comment noted.

Main Issue 6: Countryside

Agree with the approach to policies on the countryside.

Council response: Support noted.

Main Issue 7: Employment Land

Tourism should be promoted and visitor centres created (e.G. Battle of Falkirk). The Helix should be marketed as strongly as possible. Cycle tourism should be promoted.

Council response: Comments noted. Tourism networks and nodes are identified in the spatial strategy within the Proposed Plan.

Main Issue 8: Town Centres and Retail Provision

Town centres should be protected from supermarkets. Tourism should be the focus in centres, not food shopping.

Council response: Comment noted. Spatial strategy contains strong support for existing centres, as in previous plans.

Main Issue 9: Strategic Access and Sustainable Travel

Open as many rail stations as possible to give better links to cities. There should be later trains. Construct more footpaths and cycle paths.

Council response: Proposed Plan proposals INF09 and INF10 provide for the safeguarding of sites for 2 new stations. The provision of more train services is a matter for Network Rail and First Scotrail. Proposed Plan policy INF07 provides for improvements to cycling and walking infrastructure.

Main Issue 10: Climate Change

Windfarm potential is huge and positive. There should be no biomass plant in Grangemouth.

Council response: The Council is producing a Wind Energy Spatial Framework and Supplementary Planning Guidance which will set out guidance for wind energy developments within the Council area. It is intended that the guidance will safeguard more sensitive areas, and direct development to more appropriate locations. Comment relating to Grangemouth biomass proposal is noted, but it will be considered separately from the LDP process.

Main Issue 11: Design Quality and Place Making

Design improvements should focus on main thoroughfares, i.e. Grahams Road, St Crispin's Place and Middlefield.

Council response: Comment noted. Major urban road corridors are highlighted as placemaking priorities within the spatial strategy of the Proposed Plan.

Main Issue 13: Cultural Heritage

Historic sites should be marketed and visitor centres created to boost tourism.

Council response: Comment noted.

Main Issue 14: Waste and Minerals

Home composting bins should be introduced for blocks of flats.

Council response: Comment noted. Policy RW09 in the Proposed Plan requires new development to include appropriate provision for the collection and storage of waste and recyclable materials, including composting facilities.

00469 **Dyer Susan**

Comments: 16

Vision

The Council's Vision is supported.

Council response: Support welcomed.

Main Issue 1: Housing Growth

Medium growth seems the sensible option in the current financial climate.

Council response: Support welcomed. Growth has been scaled down slightly from the MIR in the light of updated household projections

Main Issue 2: Sustainable Housing Locations

Planned growth in housing needs to take cognisance of the pressure on local schools through providing appropriate planning gain, building new classes and allocating additional playground areas. With reference to Bankier Primary in Banknock extra playground space is requested from the area of land between Bog Road and the back of Bankier Sports Hall.

Council response: Comment noted. It is understood that the requested expansion of school grounds at Bankier Primary into the area between Bog Road and the back of Bankier Sports Hall has been deemed acceptable as part of the consideration of the planning application for the Banknock North site (M03)

Main Issue 3: Housing Need

Agree with the Council's preferred option for housing need.

Council response: Comment noted

Main Issue 4: Infrastructure for Growth

Agree with the Council's preferred option for infrastructure for growth.

Council response: Comment noted

Main Issue 5: Green Belt

The green belt should be protected.

Council response: Comment noted.

Main Issue 6: Countryside

As regards development in the countryside, redevelopment is OK but new developments are not.

Council response: Comment noted. In line with Scottish Planning Policy, the policies in the Proposed Plan identify some circumstances in which new development in countryside can be appropriate.

Main Issue 7: Employment Land

Agree with the Council's preferred option for tourism, however, the Helix project needs to be given priority. Disappointed to hear that it is no longer planned to engineer the Kelpies as a working part of the sea lock as this would have been inspirational and a major tourist attraction for the area, generating massive inward investment and great wealth for the area through tourism.

Council response: Comment noted. The Helix has been identified as a tourism node as part of policy BUS01 "Business and Tourism Locations"

Main Issue 8: Town Centres and Retail Provision

Denny should be a priority district centre.

Council response: Denny has been a focus for regeneration efforts as part of the Town Centres Strategy. The redevelopment of Church Walk is highlighted as a proposal within the Proposed Plan, and planning permission has now been granted for Phase 1 of the scheme.

Main Issue 9: Strategic Access and Sustainable Travel

Need to improve the cycling network and integrate transport.

Council response: Proposed Plan policy INF07 provides for improvements to cycling and walking infrastructure. The Local Transport Strategy is the vehicle for promoting integrated transport, supported by the LDP. Proposal M08 provides an opportunity to enhance the integration of bus and rail at Grahamston and proposals M09 and INF13 promote the improvement of Falkirk Bus Station.

Main Issue 10: Climate Change

All new buildings should incorporate ground source heat pumps and PV panels. Insulation and glazing should be of the highest standards.

Council response: The Proposed Plan will seek to ensure that all new development seeks to reduce carbon emissions and incorporates renewable energy technology. The Proposed Plan specifies that a minimum 10% of the mandatory carbon reduction standard as set out in the Building Regulations is to be met by the installation and operation of renewable technologies.

Main Issue 10: Climate Change

Windfarms are welcomed. Opportunities for tidal power generation in the Firth of Forth should be investigated.

Council response: The Council is producing a Wind Energy Spatial Framework and Supplementary Planning Guidance which will set out guidance for wind energy developments within the Council area. It is intended that the guidance will safeguard more sensitive areas, and direct development to more appropriate locations. Tidal power generation in the Firth of Forth would fall within the Marine Spatial Planning regime, and decision-making for individual proposals would lie with the Scottish Government.

Main Issue 11: Design Quality and Place Making

Need to do something about litter and flytipping. Planting and landscaping enhance the area. Need colour from bedding. Please think carefully about architecture.

Council response: Comments noted.

Main Issue 12: The Green Network

The Helix project needs to be a priority. Please preserve as many greenfield sites as possible and make them accessible to walkers and cyclists.

Council response: Comments noted.

The Helix has been identified as a distinct green network opportunity (GN09) in the Proposed Plan. Policy GN05 "Outdoor Access" of the Proposed Plan indicates that the Council will seek to safeguard, improve and extend the network of outdoor access routes.

Main Issue 13: Cultural Heritage

Agree with the Council's preferred option for cultural heritage.

Council response: Support noted.

Main Issue 14: Waste and Minerals

Falkirk should invest in implementing a zero waste plan. The current recycling scheme is superb. Would like to see any non recyclable waste incinerated to produce energy and/or biofuels rather than being put into landfill.

Council response: The comments are noted. Planning policy will reflect the waste hierarchy preference for prevention, followed by reduction, reuse, recycling and energy recovery over waste disposal. It is anticipated that there will be a gradual reduction in waste going to landfill in line with the Zero Waste Plan requirements and an expansion of other waste management facilities which could include thermal treatment.

00774 Eadie Developments Ltd

Comments: 1

POL/B Polmont Potential New Sites

A site at the Whyteside House Hotel in Polmont should be allocated for residential development in the LDP. The site is brownfield and should be a priority for development. Reference is made to the HNDA and the projected increase in number of households generally across the Council area, and particularly in the Polmont/Rural South area. The developer wishes to develop a flatted scheme which will particularly cater for the projected increase in smaller households.

Council response: The site is recognised as a legitimate brownfield opportunity and has been identified as a proposal in the Proposed Plan.

00791 Easton David

Comments: 1

RUR/B Rural Area Potential New Sites

Supports housing at Blackbraes, California (RUR/B/02). It will not be detrimental to the environment and would help address local housing shortages.

Council response: No allocation has been made at Blackbraes in the Proposed Plan. The site is located in the countryside outside the boundary of existing settlements and its development would be considered to be unsustainable due to the distance from existing services. The site furthermore does not correspond with the footprint of the former community at Blackbraes. Allocated sites in the wider Rural South area are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

00866 Falkirk BID

Comments: 4

Main Issue 7: Employment Land

The MIR outlines proposals for the eastern Gateway, and whilst the preferred options are welcomed, concern is expressed about the introduction of any major retailing developments that may harm the viability of our traditional town centres on these sites.

Council response: Comment noted. None of the specific proposals within the Eastern Gateway include any major retailing elements.

Main Issue 7: Employment Land

The fact that the Council continues to recognise that the Falkirk area has a considerable potential in the area of tourism is welcomed. The locations detailed in the plan are supported. The introduction of some means of public transport linkage between some of the key local attractions, and at the same time the introduction of an integrated signage strategy linking the attractions together with the town centres, would be welcomed.

Council response: Comments noted.

Main Issue 8: Town Centres and Retail Provision

The continued support for town centres is welcomed. Successful town centres can no longer simply rely on retail to be robust. A positive plan to manage a reduction in retail capacity may be required which will allow for a new diversity of use in certain areas of the town. Some recent superstore developments have had a negative effect on the performance of businesses in certain town centres. Any future food stores should be located as close to town centres as possible, and not on land that has been earmarked for industry or other types of commercial activity. The Council's preferred option with regard to Central Retail Park and the Falkirk Gateway is supported. Improvements to the public realm in Falkirk town centre would be welcomed, in the central core as well as the 'off' High Street areas where Falkirk's proliferation of independently owned businesses is located.

Council response: Comments noted.

Main Issue 9: Strategic Access and Sustainable Travel

The Council's application for TIF status is supported. However, affordable and realistic public transport alternatives should

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be also be looked at. There is a need to deal with traffic congestion at key times, whilst not discouraging shoppers and visitors from visiting Falkirk town centre. The Council should consider options for the introduction of Park and Ride and Park and Work facilities, and different types of tactical car parking charge incentives. The upgrade of the town centre bus station is welcomed, although the relocation of a town centre bus station in the future as part of a new transport 'hub' could be considered as part of the 20-year Vision.

Council response: Proposed Plan proposals INF11 and INF12 provide for corridor improvements on routes into Falkirk town centre which include, or contribute to, improved public transport access. Proposal INF13 promotes the improvement of Falkirk Bus Station. Other issues mentioned are for the Local Transport Strategy to address.

00891 Falkirk Whisky Distillery Co Ltd

Comments: 1

Main Issue 7: Employment Land

The LDP recognises the importance of tourism networks and key nodes providing a new range of services. Within these nodes key opportunities are listed and Beancross is identified as part of the eastern Gateway. However, the LDP should go further and provide detail on the Falkirk Whisky Distillery at Beancross which will attract a key sector of visitors. It should be listed as a key node/development opportunity.

Council response: The proposed distillery has been granted planning permission as an exceptional case in the green belt. It is not considered necessary to reflect this consent as a land use allocation in the Proposed Plan. The distillery could relate to two elements of the tourism network - the Antonine Wall and the CSGN. It is not considered to be of sufficient scale in itself to warrant identification as a node.

00788 Finlay Clare

Comments: 1

Main Issue 2: Sustainable Housing Growth

No new residential development should take place within the Bonnybridge area until substantial investment is made in village infrastructure including: medical; dental; retail; parking; education; transportation; and the improvement of the high street.

Council response: Comment noted. 4 new opportunities for housing growth have been identified within Bonnybridge at Falkirk Road, Broomhill Road, Seabegs Road and East Bonnybridge. These sites are projected to deliver 313 new homes.

00266 Finnie Martha

Comments: 1

RUR/B Rural Area Potential New Sites

Support for development at Blackbraes, California (RUR/B/02) to restore a former long established and flourishing community, and to contribute to sustainable development by offering families the opportunity to live in a healthy, natural environment.

Council response: No allocation has been made at Blackbraes in the Proposed Plan. The site is located in the countryside outside the boundary of existing settlements and its development would be considered to be unsustainable due to the distance from existing services. The site furthermore does not correspond with the footprint of the former community at Blackbraes. Allocated sites in the wider Rural South area are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

00528 Forestry Commission Scotland

Comments: 10

Main Issue 1: Housing Growth

Forestry Commission Scotland support the preferred option of a medium growth, but would like to highlight the importance of protecting and enhancing a high quality and sustainable environment in Falkirk to underpin sustainable growth and potentially attract investment. Forestry Commission strongly recommend the creation of a robust green structure, as a setting for new development, to ensure the provision of multifunctional strategic green spaces and corridors. These landscape structures should be put in place at the earliest stages of the proposed development and to allow them to mature over time,

Council response: Comment noted. The importance of capitalising on green network opportunities as part of growth areas has been emphasised in the Proposed Plan.

Main Issue 2: Sustainable Housing Locations

Forestry Commission Scotland would recommend that the LDP require masterplans for the housing sites to address the aims of the Open Space Strategy, the Central Scotland Forest Strategy, the Outdoor Access Strategy and the CSGN by clearly identify the new elements to be knitted into the existing natural and man made environment. Forestry Commission are particularly concerned with the amount of woodland loss due to new development across Central Scotland. As a result Scottish Ministers have approved a 'Policy on Control of Woodland Removal' (reference in SPP para 148). This Policy seeks to protect the existing forest resource in Scotland and supports woodland removal only where it would achieve significant and clearly defined additional public benefits. Forestry Commission strongly recommends this policy be referred to in Local Development Plans and Supplementary Planning Guidance.

Council response: The guidance in Appendix 2 of the Proposed Plan for major housing sites making up Strategic Growth Areas contains a requirement for masterplans to be developed in most instances. This guidance provides information on the elements to be included in the masterplan, which will cover open space, green network and outdoor access issues, where appropriate. The government's 'Policy on Control of Woodland Removal' is referenced in the supporting text to Proposed Plan policy GN04 Trees, Woodland and Hedgerows.

Main Issue 4: Infrastructure for Growth

Forestry Commission support the view as expressed in the MIR that there is increased emphasis on green infrastructure to provide a network of natural green spaces and access opportunities. These support both the development of the CSGN and the Central Scotland Forest. Opportunities should be sought to secure the timely delivery of such improvements.

Council response: Supportive comment noted. The Proposed Plan contains 32 opportunities for green network enhancement.

Main Issue 6: Countryside

Forestry Commission support the preferred option for Housing in the Countryside

Council response: Support noted.

Main Issue 7: Employment Land

Forestry Commission support the identification of a new approach to tourism development that considers area-wide themes such as the Central Scotland Green Network and recreational opportunities in the countryside. We would be delighted to be involved in the identification of key nodes and networks to guide the spatial development of tourism in the area.

Council response: Supportive comments noted.

Main Issue 10: Climate Change

Forestry Commission support the identification of 'protection and management of existing woodland' and 'creation of new woodland' as key interventions to meet Carbon Storage measures. Relevant links with the emerging Forest and Woodland Strategy for the Central Scotland Forest should be identified in the forthcoming LDP to inform the future development and management of forestry and woodland in Falkirk. Ancient and Semi Natural Woodland is an important National resource that should be protected and enhanced. Other woodland, hedgerows and individual trees may also have high biodiversity value and should therefore be protected from adverse impact resulting from development (SPP para 147). Again we recommend the Scottish Government's Policy on Control of Woodland Removal to be referenced with this main issue.

Council response: Policies in the Proposed Plan will safeguard Ancient and semi-natural woodland, and other areas of woodland with biodiversity value. The over-arching Green Network strategy and relevant policies in the Proposed Plan seek to promote landscape improvement, woodland creation, habitat enhancement and outdoor access. Carbon storage is identified in the Strategic Objectives and Vision section of the Proposed Plan.

Main Issue 10: Climate Change

It is Forestry Commission's view that the MIR should consider all the renewable technologies that are available and are becoming economically viable. One of the technologies that may contribute include biomass (reference in SPP, para 182), including district heating schemes and biomass heating plans for businesses.

Council response: The Scottish Government has set ambitious targets for the proportion of electricity and heat demand which should be met from renewable sources. The contribution which the Council could make to meeting these targets has been reviewed, and this confirms that wind and biomass have some potential at a commercial scale

Main Issue 11: Design Quality and Place Making

Forestry Commission support the preferred option on design quality and placemaking.

Council response: Support noted.

Main Issue 12: The Green Network

Forestry Commission strongly support the development of a Green Network for Falkirk that is intended to complement the growth strategy. The LDP and other strategies should investigate opportunities to create new elements of the green network associated with proposed well designed development and to improve its connectivity, accessibility and quality. Discussion is currently taking place between local agencies and partners to develop proposals for specific Green Network actions and projects as indicated in Figure 5.3. We strongly support the proposed approach and we look forward to work in partnership with others to co-ordinate delivery mechanisms on the ground and securing links with the wider Central Scotland Green Network.

Council response: Comment noted. Policy GN01 "Falkirk Green Network" requires that new development, and in particular the strategic growth areas and strategic business locations, should contribute to the green network, where appropriate, through the integration of green infrastructure into masterplans or through enabling opportunities for green network improvement on nearby land.

Main Issue 14: Waste and Minerals

Minerals policy should include a recommendation for operators to consider after uses that result in environmental improvement, rather than restoring land to its previous state (SPP, para 235). When forestry is the proposed after use, Forestry Commission Scotland would be happy to provide guidance and support for the restoration of sites and their management

Council response: Proposed Plan policy RW03 Assessment of Mineral Proposals includes a reference to schemes for restoration of mineral sites requiring to secure benefits for the green network.

Main Issue 8: Town Centres and Retail Provision

Improvements are needed to some of the areas of Falkirk Town Centre outwith the core area, e.g. Princes Street, Lower Vicar Street and the East End. These include resurfacing and improved street lighting.

Council response: The Falkirk Town Centre Townscape Heritage Initiative (THI), which is highlighted in the Proposed Plan, will enhance a number of secondary areas of the town centre through building repairs, shopfront improvements and public realm works. The East End is identified as an opportunity area in the Proposed Plan, but redevelopment will require landowner agreement and action.

00535 Forth Energy

Comments: 6

Main Issue 7: Employment Land

The preferred option for strategic employment growth is broadly supported however to enable the port to develop it is considered that the whole of the port rather than separate sites within it should be identified as a strategic employment site for general industry, storage and distribution and port related uses. The recognition in the MIR of the areas's key economic assets is acknowledged and it is agreed that these are essential to the growth of a successful economy and that the port can help deliver this growth. The port has the potential to support other land use requirements including renewable energy and waste management facilities. The protection of existing business areas with some degree of flexibility for future uses is welcomed. Forth Energy supports the Council's preferred option to promote economic growth through existing sites and welcomes the identification of the Grangemouth Freight Hub as a Strategic Employment Investment Zone.

Council response: The port is identified as either existing business and industry land or with proposed sites. The whole area is therefore covered by a business and industry allocation. The preferred location for waste management facilities includes land identified for employment and industrial uses which includes the port area and the potential for renewable energy is acknowledged in the status of the proposal ED15 in the LDP.

Main Issue 4: Infrastructure for Growth

The preferred option of addressing existing constraints in the local and strategic road network is supported however in asking for developer contributions the ability to meet requirements and the viability of developments should be taken into account. The use of TIF is supported and it is not considered that the burden of infrastructure costs should be solely with the private sector. Financial contributions should not be sought where there is no significant uplift in land value associated with the development. The use of Planning Agreements should be restricted to require contributions only where measures are necessary for development to go ahead and in accordance with the circular.

Council response: Proposed Plan policy INF02 and related SG concerned with developer contributions highlight need for S75s to comply with the provisions of Circular 3/2012. The viability of development will be taken into account in agreeing the timing of payments.

Main Issue 10: Climate Change

A further key objective should be included for Falkirk to contribute to achieving the 2020 renewable energy targets. Falkirk should capitalise on opportunities for decentralised energy generation and on low carbon heat networks - these should be considered together as they have the potential to contribute to lowering carbon in individual buildings. Carbon reduction targets should not exceed Scotland wide targets. The decentralisation of electricity generation is supported and this should take place at a variety of scales. The reference to bio-mass should be extended to include the role this energy source can play in supporting decentralised low carbon electricity and heat generation. The retention of the policy framework for renewable energy and the development of a spatial framework for wind energy is supported but it is considered that this policy should be widened to support the development of heat networks for business and industry and to provide district heating where feasible. Forth Ports and SSE would welcome the opportunity to work with the Council to investigate this potential. It is recognised that there is a need to update existing policy on flooding. However the proposal to address flood risk in Grangemouth should be based on comprehensive investigations in consultation with SEPA.

Council response: The Council will seek to ensure that all new development seeks to reduce carbon emissions and incorporates renewable energy technology. The Proposed Plan specifies that a minimum 10% of the mandatory carbon reduction standard as set out in the Building Regulations is to be met by the installation and operation of renewable technologies. It is considered that this approach will enable Scottish Government requirements to be met but also allow businesses sufficient flexibility.

The Spatial Framework for wind energy development addressed a specific requirement from the Scottish Government. It is not considered appropriate to widen the scope to include other forms of renewable energy. The Council will remain broadly supportive and proposals which come forward will be assessed against relevant renewable energy and other appropriate policies within the Proposed Plan.

Proposal INF22 (Grangemouth Flood Defences) indicates that detailed design work for a flood defence scheme is still to be prepared but a project is scheduled to be ready by 2015 for inclusion in Forth Estuary Flood Risk Management Plan. This Flood Risk Management Plan will be prepared in partnership with SEPA.

Main Issue 12: The Green Network

The preferred option is broadly supported. The potential for coastal realignment is not supported where there is an impact on port operations. Forth Ports would welcome the opportunity to discuss this in relation to the impact on their land holdings, their operations and port security. The SPA does not require further protection as part of the green corridor network.

Council response: Comments noted. The impact of any proposal for managed realignment of the coast on port operations would be taken into account during the development management process. The identification of the Firth of Forth as a key green network corridor under Policy GN01 "Falkirk Green Network" does not provide any extra protection for the Firth of Forth SPA.

Main Issue 14: Waste and Minerals

The preferred option to continue the existing policy on waste and minerals is supported.

Council response: The support is noted.

Vision

The preferred vision for the Council area is supported. This supports the port's existing role and its future development.

Council response: Support welcomed.

00020 Forth Ports plc

Comments: 7

Main Issue 4: Infrastructure for Growth

The preferred option for infrastructure growth is supported. Flood management is highlighted and Forth Ports would welcome the opportunity to talk to the Council on any matters which could affect their operations and any future development of the port. Developer contributions should not be sought where development does not contribute to flood risk or mitigates against it. The use of TIF is supported and it is not considered that the burden of infrastructure costs should be solely with the private sector. Financial contributions should not be sought where there is no significant uplift in land value associated with the development. The use of Planning Agreements should be restricted to require contributions only where measures are necessary for development to go ahead and in accordance with the circular.

Council response: Proposed Plan proposal INF22 provides for flood defences at Grangemouth. Proposed Plan policy INF01 Strategic Infrastructure makes provision for the Council to explore traditional and innovative funding mechanisms, including TIF, to secure the provision of infrastructure. Proposed Plan policy INF2 and related SG concerned with developer contributions highlight the need for S75s to comply with the provisions of Circular 3/2012.

Main Issue 7: Employment Land

The preferred option for strategic employment growth is broadly supported however to enable the port to develop it is considered that the whole of the port rather than separate sites within it should be identified as a strategic employment site for general industry, storage and distribution and port related uses. The recognition in the MIR of the areas's key economic assets is acknowledged and it is agreed that these are essential to the growth of a successful economy and that the port can help deliver this growth. The port has the potential to support other land use requirements including renewable energy and waste management facilities. The protection of existing business areas with some degree of flexibility for future uses is welcomed. Forth Port's supports the Council's preferred option to promote economic growth through existing sites and welcomes the identification of the Grangemouth Freight Hub as a Strategic Employment Investment Zone.

Council response: The port is identified as either existing business and industry land or with proposed sites. The whole area is therefore covered by a business and industry allocation. The preferred location for waste management facilities includes land identified for employment and industrial uses which includes the port area and the potential for renewable energy is acknowledged in the status of the proposal ED15 in the LDP.

Main Issue 9: Strategic Access and Sustainable Travel

The preferred option of addressing existing constraints in the local and strategic road network is supported however in asking for developer contributions the ability to meet requirements and the viability of developments should be taken into account. The use of TIF is supported and it is not considered that the burden of infrastructure costs should be solely with the private sector. Financial contributions should not be sought where there is no significant uplift in land value associated with the development. The use of Planning Agreements should be restricted to require contributions only where measures are necessary for development to go ahead and in accordance with the circular.

Council response: Proposed Plan policy INF2 and related SG concerned with developer contributions, highlight the need for S75s to comply with the provisions of Circular 3/2012, and include the viability of development as a consideration for decision-makers.

Main Issue 10: Climate Change

A further key objective should be included for Falkirk to contribute to achieving the 2020 renewable energy targets. Falkirk should capitalise on opportunities for decentralised energy generation and on low carbon heat networks - these should be considered together as they have the potential to contribute to lowering carbon in individual buildings. Carbon reduction targets should not exceed Scotland wide targets. The decentralisation of electricity generation is supported and this should take place at a variety of scales. The reference to bio-mass should be extended to include the role this energy source can play in supporting decentralised low carbon electricity and heat generation. The retention of the policy framework for renewable energy and the development of a spatial framework for wind energy is supported but it is considered that this policy should be widened to support the development of heat networks for business and industry and to provide district heating where feasible. Forth Ports and SSE would welcome the opportunity to work with the Council to investigate this potential. It is recognised that there is a need to update existing policy on flooding. However the proposal to address flood risk in Grangemouth should be based on comprehensive investigations in consultation with SEPA.

Council response: The Council will seek to ensure that all new development seeks to reduce carbon emissions and incorporates renewable energy technology. The Proposed Plan specifies that a minimum 10% of the mandatory carbon reduction standard as set out in the Building Regulations is to be met by the installation and operation of renewable technologies. It is considered that this approach will enable Scottish Government requirements to be met but also allow businesses sufficient flexibility.

The Spatial Framework for wind energy development addressed a specific requirement from the Scottish Government. It is not considered appropriate to widen the scope to include other forms of renewable energy. The Council will remain broadly supportive and proposals which come forward will be assessed against relevant renewable energy and other appropriate policies within the Proposed Plan.

Proposal INF22 (Grangemouth Flood Defences) indicates that detailed design work for a flood defence scheme is still to be prepared but a project is scheduled to be ready by 2015 for inclusion in Forth Estuary Flood Risk Management Plan. This Flood Risk Management Plan will be prepared in partnership with SEPA.

Main Issue 12: The Green Network

The preferred option is broadly supported. The potential for coastal realignment is not supported where there is an impact on port operations. Forth Ports would welcome the opportunity to discuss this in relation to the impact on their land holdings, their operations and port security. The SPA does not require further protection as part of the green corridor network.

Council response: Comments noted. The impact of any proposal for managed realignment of the coast on port operations would be taken into account during the development management process. The identification of the Firth of Forth as a key green network corridor under Policy GN01 "Falkirk Green Network" does not provide any extra protection for the Firth of Forth SPA.

Main Issue 14: Waste and Minerals

The preferred option to continue the existing policy on waste and minerals is supported.

Council response: Support noted.

Vision

The preferred vision for the Council area is supported. This supports the port's existing role and its future development.

Council response: Support welcomed.

00592 Forth Valley College

Comments: 3

Main Issue 3: Housing Need

Future LDP policy involving affordable housing provision should incorporate a degree of flexibility specifically in relation to the sale of public sector land holding assets where such provision would impact on the sale value of the site, thus potentially jeopardising the future viability of public sector projects.

Council response: The SG supporting Proposed Plan policy HSG02 Affordable Housing adopts a flexible approach to provision. The development plan seeks to maximise development potential across all sites, regardless of ownership, provided environmental and community impacts issues are addressed.

Main Issue 8: Town Centres and Retail Provision

Whilst there is support for the preferred option for town centres, the Council should review the requirement for food shopping provision on the eastern periphery of Falkirk. There is potential for convenience shopping in this vicinity, serving a redeveloped Forth Valley College campus and residential areas in the vicinity, and enjoying good access by public transport, cycling and walking.

Council response: There is no justification or need for significant new food shopping on the eastern periphery of the town. It is possible there may be scope for smaller stores serving a neighbourhood need if these can satisfy the generic shopping policies contained in the Proposed Plan.

FAL/B Falkirk Potential New Sites

Forth Valley College are exploring a joint venture masterplan approach, with potentially residential and retail as well as college uses, to deliver enhanced campus facilities at the current site on Grangemouth Road, Falkirk. The site is divided into three. The main west campus is intended to be redeveloped in phases for the new college. The Middlefield campus could accommodate college, supermarket or residential use. The surplus land to the rear of the main west campus is seen as appropriate for college or residential use, and should be identified as a housing site which could be developed in the 2014-2024 period.

Council response: Proposed plan proposal INF23 provides for a new college campus and proposal H32 for the allocation of a housing site at Forth Valley College.

00907 Fortune Frank and Birgitta

Comments: 1

Main Issue 2: Sustainable Housing Locations

Development of sites POL/B/2,3,13,15 & 17 is not supported as the local road network does not have the capacity to accommodate this scale of additional development which would lead to increased traffic congestion, increased noise and nuisance and reduced road safety. Development would also lead to: the loss of habitat used by protected species such as badger and bats; the loss of green space and a corresponding reduction in the quality of life of existing residents; the increased use of the local path network and associated increases in nuisance behaviour such as dog fouling.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00782 Fotheringham Irene

Comments: 7

Main Issue 2: Sustainable Housing Locations

Concern is expressed about development of site at Crossbrae/Cruikshanks Drive, Shieldhill, across which run two well worn access paths. Understand that there is outline planning consent for 8 houses which is considered to be excessive.

Council response: Comment noted. The site is not specifically allocated for development in the Proposed Plan, although it is within the Shieldhill Village Limit.

Main Issue 2: Sustainable Housing Locations

MIR representation sites in Shieldhill represent serious overdevelopment, which would overload existing roads, policing and healthcare facilities and destroy the rural aspect of the area. Shieldhill should be surrounded by trees to restore land affected by previous industry.

Council response: The site at Hillcrest is the only new proposal for housing development in the Proposed Plan. It's capacity will be restricted to 30 units which, together with the existing committed site at Reddingmuirhead Road for 10 units, is not considered to be an excessive level of growth for the village. The other non-preferred sites in Shieldhill shown in the MIR are not proposed for development.

Main Issue 7: Employment Land

The refinery at Grangemouth will be slowly closed down as it is old, and any new discoveries of oil will be piped to the north east of England where refineries abound with a large workforce out of work. The docks in Grangemouth are not large enough for big ships and the river needs to be continuously dredged to keep shipping channels open. (This is all expense).

Council response: The Grangemouth petrochemical and chemical sector remains strong and presents good opportunities for growth over the plan period. It is accepted that it will have to adapt to changing markets and economic circumstances, including the shift toward the low carbon economy. Grangemouth also remains Scotland's largest port with growing container traffic and potential for growth as part of the Grangemouth Freight Hub proposals in the National Planning Framework.

Main Issue 9: Strategic Access and Sustainable Travel

Roads need to be built to support growth in the area. Unless buses are free for everyone, they will not be used as they are too expensive.

Council response: The Proposed Plan strategy of modest growth envisages a minimum of additional road infrastructure improvements deemed essential to address known deficiencies. The setting of bus fares is a matter for the operator, taking account of available public subsidy levels.

Main Issue 10: Climate Change

Would be sensible to have windfarms to the west of Shieldhill or to the south between Shieldhill and California. These would give farmers revenue without enlarging the village and spoiling its unique status and individuality.

Council response: Comments noted. The Council is producing a Wind Energy Spatial Framework and Supplementary Planning Guidance which will set out guidance for wind energy developments within the Council area. It is intended that the guidance will safeguard more sensitive areas, and direct development to more appropriate locations.

Main Issue 13: Cultural Heritage

Consider that if outbuildings at Callendar House are updated and maintained, this is enough in the present economic climate.

Council response: Comment noted.

SHIE/B Shieldhill Potential New Sites

Opposition is expressed to development of the site at Hillcrest Farm, Shieldhill (SHIE/B/02) which is an area of wildlife interest.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate ecological impact. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

01030 Frickleton G

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site.

Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00103 **Friends Of The Earth Falkirk**

Comments: 12

Vision

The preferred vision is supported, particularly sustainability emphasis. There would be concern about individual communities losing their identity, as envisaged in the city vision. The status quo would be preferable to the city vision.

Council response: Support welcomed.

Main Issue 2: Housing Growth

The medium growth option is viewed with caution as there is a fear that the green belt will be eroded and the environment will not be given insufficient consideration in new development. The loss of distinct communities is also a concern.

Council response: The annual housing target has been scaled down from the MIR in the light of updated household projections. The strategy involves only two relatively minor changes to the green belt. There is a strong focus on redevelopment of brownfield sites, although some further greenfield growth is necessary to ensure a generous supply of land for housing as required by the SPP.

Main Issue 2: Sustainable Housing Locations

Overall concern at the extent of loss of greenfield sites. More emphasis should be placed on using land in built up areas. Concern about allocation at Bo'ness Foreshore in view of sea level rise and increased risk of flooding. Avoiding southern expansion of Falkirk is supported. Concern about scale of growth in Larbert/Stenhousemuir and Polmont in terms of impact on green belt and inability of infrastructure to cope. Housing should be carbon neutral. General concern about lack of social space in new developments, increase in car use, and communities becoming commuter villages.

Council response: Comments noted. Whilst every effort has been made to maximise the use of brownfield land for housing, a proportion of committed and proposed additional sites are greenfield. This is essential to maintain the scale, choice and flexibility of the housing land supply, as required by Scottish Planning Policy. Bo'ness foreshore has been deferred to post 2024. Most growth in Larbert/Stenhousemuir and Polmont is committed. Allocations in Polmont have been reduced.

Main Issue 4: Infrastructure for Growth

Falkirk bus station upgrade would be welcomed. Road and public transport upgrades are required to serve the scale of new development. Support for LZCGT is welcomed.

Council response: Proposed Plan proposal INF13 supports the upgrade of Falkirk Bus Station. Policies INF08 and INF10 provide for road and public transport provision to serve the scale of new development.

Main Issue 5: Green Belt

Green belt preferred option is supported. Skinflats area is recognised as not separating two urban areas. Expansion of green belt would also be welcomed; deletion for major land releases would not.

Council response: Comment noted. In the Proposed Plan, two additional areas of green belt release have been included: a large area to the east of Bonnybridge for housing and recreation facilities; and a small area at Lochlands Industrial Estate for business use.

Main Issue 6: Countryside

Proposals for control of development in the countryside are supported.

Council response: Support noted.

Main Issue 7: Employment Land

Deletion of Wood Street and Kinneil Kerse as employment sites is supported. Klondyke site would only be supported if there are safeguards for the green belt and Antonine Wall. There is a need for better public transport provision for out-of-town employment sites. Tourism proposals are generally welcomed, although the potential for tourism at Beancross, Gilston and Falkirk Gateway is questioned.

Council response: Comments noted. Falkirk Gateway and Gilston are major commercial development opportunities in gateway locations which are well placed to deliver tourism infrastructure such as hotels, restaurants etc. Beancross is no longer identified as a tourism node.

Main Issue 8: Town Centres and Retail Provision

Preferred approach to Falkirk Town Centre is welcomed, including diversification of use and the opportunities listed. Emphasis should be on small-scale retail. The area has enough supermarkets. Maintaining the restricted retail scope of the Falkirk Gateway is supported.

Council response: Support noted.

Main Issue 9: Strategic Access and Sustainable Travel

More emphasis needs to be placed on realistic and affordable alternatives to the car. Too much expenditure on roads, compared with on other transport modes.

Council response: The Proposed Plan, in line with the Local Transport Strategy, already prioritises sustainable travel modes, such as walking and cycling before the car in its approach to transport provision. However, with a growing population, where 80% of trips by Falkirk residents are made by car, and taking account of Falkirk's key position as a logistics hub for Scotland, the Council has to ensure that road traffic is managed effectively and that pinch points in the road network are removed.

Main Issue 10: Climate Change

Pleased to see emphasis on sustainability at the heart of the preferred vision. Preferred approach on low carbon development is supported, although it is questioned why a more ambitious target could not be set. In terms of renewable energy, concerns are expressed about the sustainability of the biomass proposal - there should be an emphasis instead on small-scale on site renewables and community projects.

Council response: The Proposed Plan specifies that a minimum 10% of the mandatory carbon reduction standard as set out in the Building Regulations is to be met by the installation and operation of renewable technologies. It is considered that this approach will enable Scottish Government requirements to be met but also allow for sufficient flexibility. Comments relating to Grangemouth Biomass proposal are noted. Policies within the Proposed Plan support for a range of renewable technologies, both embedded within new development, and for individual projects.

Main Issue 12: The Green Network

Support for the development of the green network although there is a contradiction given the proposals for loss of land supporting habitats.

Council response: Comment noted. Allocations generally avoid habitats of high value and emphasis is placed in the Proposed Plan on development creating new green infrastructure to add to the green network.

Main Issue 14: Waste and Minerals

The need to reduce waste to landfill is emphasised. Concern is expressed about the environmental effects of West Carron landfill. There is also concern about the extraction of coalbed methane due to uncertain environmental consequences.

Council response: Planning policy will reflect the waste hierarchy preference for prevention, followed by reduction, reuse, recycling and energy recovery over waste disposal. It is anticipated that there will be a gradual reduction in waste going to landfill in line with the Zero Waste Plan requirements however existing sites will continue to contribute to the landfill capacity requirements contained within the ZWP. The comments on coal bed methane are noted.

00995 Fullerton & Lesley Scaife Grant

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01006 Galloway Janet

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00812 Gatherer Cecilia

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of village and have an adverse effect on the area's ecosystem. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure (particularly healthcare, roads and education) will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00766 **Gatherer Derek**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons. Sites POL/B/13,15 & 17 are not supported. The local road network does not have the capacity to be able to cope with the scale of development envisaged on all of these sites. Development would be to the detriment of road safety.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00833 **Gatt John**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the area's natural beauty. Sites POL/B/2,3,13,15 & 17 are not supported. Local schools infrastructure will not be able to cope with the scale of development envisaged on all of these sites. The sites are also in an area of underlying mining problems.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00981 **Gavin A**

Comments: 3

Main Issue 2: Sustainable Housing Locations

Qualified support is given to the preferred growth option if it limits growth to Committed Sites only. There is no requirement for a huge expansion of housing so should be no carry forward of preferred sites. There should be a parallel commitment to provide infrastructure and amenities appropriate to scale of housing. While accepting that an expansion of Denny Primary School may be required there should be a check made on the number of pupils attending schools outwith their nominal catchment area.

Council response: The Proposed Plan confirms the promotion of modest expansion, preferred in the MIR, for Denny and District, and identifies new proposals on sites at Mydub 2 and Rosebank in Dunipace, and extensions to the existing Broad Street and Carrongrove Mill sites. The provision of further school and road infrastructure to accommodate development is dependent on developer contributions. The projection of school populations is based on a robust methodology, taking account of birth rates, in-migration, new housebuilding and Primary 1 intakes, although school placement requests, by definition, can only be estimated.

Main Issue 7: Employment Land

The Council should invest in attracting incoming business to Denny, taking into account the future requirement of residents and allowing traders to have the potential to prosper.

Council response: The Proposed Plan identifies land for business on the existing Winchester Avenue Industrial Estate and a further opportunity of 3 ha at the mixed use Broad Street site. The town centre is identified as a site for new retail development. The development plan is just one element of the Council's corporate role in attracting business to the area.

Main issue 12: Green Network

Pleased with the success of the path network around Denny but is concerned that there should be no reduction in public access where new housing comes forward.

Council response: Comment noted. Policy GN05 "Outdoor Access" indicates that the Council will seek to safeguard, improve and extend the network of outdoor access routes, with particular emphasis on the core path network, and routes which support the development of the Green Network.

00313 **George Russell Construction Ltd**

Comments: 2

Main Issue 2: Sustainable Housing Locations

George Russell Construction believe that a number of committed sites will make little or no contribution to meeting housing need for the foreseeable future. Many are no longer financially viable, due to high acquisition costs, high start up costs or unsustainable planning gain requirements. Consequently the overall supply needs to be augmented with sites with no such constraints.

Council response: The Proposed Plan identifies a new site at The Glebe, Airth as a housing opportunity which will augment the supply of housing land in Rural North.

AIR/B Airth Potential New Sites

Airth Mains Farm (site AIR/B/02) has financial backing to commence construction in the near future. It can be developed without waiting for the adjacent site to come forward. Key constraint of Airth Primary School does have spare capacity as it is unlikely other sites built into forecasts will be developed.

Council response: The site at Airth Mains Farm has not been identified as a housing proposal in the Proposed Plan. Development of this site would represent a major expansion of Airth into agricultural land to the west of the village. The scale of growth is excessive in relation to the size of the village. The site sits on an exposed escarpment and its development would have a major visual impact on views from north-westerly and northerly directions. The site has relatively poor access to transport and local services. While school capacity constraints have eased they are still significant enough, along with WWTW capacity issues, for an expansion of this scale to be unsustainable.

00813 **Gill Jen**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of village. Sites POL/B/13 & 17 are not supported.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

01020 **Gillespie Robert & Lorraie**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment. Development of this site would result in further loss of identity. Local infrastructure and amenities are struggling to cope with existing demands on them, e.G. Schools, medical centre and roads. The site supports a variety of wildlife, and has mine workings underneath. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00880 **Glenberrie House Hotel Ltd**

Comments: 2

Main Issue 7: Employment Land

Glenberrie House Hotel Ltd request that the Glenberrie House site be included in the Larbert Gateway Strategic Employment Growth Zone.

Council response: The Glenberrie House site has not been included in the Larbert Gateway Strategic Business Location (SBL) in the Proposed Plan. The site would not be suitable for the business/industry uses considered appropriate for the other sites within the SBL, given its environmental sensitivities and infrastructure constraints.

TOR/B Torwood Potential New Sites

Glenberrie House Hotel Ltd request that the site at Glenberrie House is allocated in the LDP as a mixed use development opportunity comprising 120 bed hotel, residential apartments (indicatively 28) and holiday lodges (indicatively 6).

Council response: The site at Glenberrie House has not been identified as a proposal in the Proposed Plan. Development of the site for hotel and leisure uses would be acceptable in this location but providing a residential element would not. The principles of allocating this site for such a mixed use proposal were argued at the FCLP LPI and there has been no significant change in circumstances to warrant a change in view since then, that allocation was not appropriate. The site has a sensitive landscape setting and its development is significantly constrained by a lack of waste water drainage capacity and spare school capacity.

00986 **Gorton M and I**

Comments: 1

Main Issue 2: Sustainable Housing Locations

Development of sites POL/B/2,3,13,15 & 17 for housing is not supported. Local infrastructure (particularly schools and roads) will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00882 **Graham D**

Comments: 9

Vision

The preferred vision is supported.

Council response: Support welcomed.

Main Issue 1: Housing Growth

A high growth rate is supported rather than medium growth as identified in the 'Preferred Option'. The additional housing required as identified in Figure 3.1 should be provided for in accordance with the HNDA estimated requirements and SPP for Plans to provide for a generous supply of land for housing.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing Locations

Whilst the general strategy identified in the Preferred Option for Denny is supported, it is considered that this should be expanded to include support for the redevelopment of additional brownfield sites for modest expansion to provide flexibility in the supply of housing.

Council response: The Proposed Plan provides for a mix of large and small sites, both brownfield and greenfield, to meet the Denny settlement additional housing requirement of 408 homes by 2024. The development of suitable windfall sites on land within the urban limit under policy HSG03 can provide further housing choice.

Main Issue 3: Housing Need

The Preferred Option on housing need is supported. However, a high growth rate should be promoted in the LDP in order to improve flexibility in the supply of housing over the Plan period, which would, as a consequence, support housing delivery, including affordable housing.

Council response: Supporting comment noted. A moderate growth strategy for new housing land has been adopted to reflect the high levels of existing land supply and taking a pragmatic view of the ability of the house building industry to meet supply targets

Main Issue 6: Countryside

In relation to development in the countryside, the first alternative option is supported as an additional category to the stated preferred option. This would allow flexibility in the provision of housing land and meet SPP objectives for the redevelopment of Brownfield sites, which can frequently lead to other environmental benefits.

Council response: Allowing housing development on brownfield sites generally in the countryside is not considered a sustainable approach. The number of rural sites which could be considered brownfield would be such that this would lead to extensive sporadic development in locations likely to be dependent on the private car.

Main Issue 11: Design Quality and Place Making

The preferred option on design and placemaking is supported.

Council response: Support noted.

Main Issue 14: Waste & Minerals

A new policy should be introduced on dimension stone extraction. It has become clear that the existing minerals policy framework does not lend itself to assessing proposals for dimension stone extraction. NPF2 acknowledges the importance of local sources of mineral resources, particularly in the Central Belt, which adds further weight to the need for a relevant minerals policy on dimension stone in Falkirk.

Council response: After consideration it has been decided not to introduce a specific policy on dimension stone extraction. It is considered the working of this resource can be safeguarded through minerals policies RW02 and RW03 in the Proposed Plan.

DEN/B Denny Potential New Sites

Land at Denovan Mains Farm, Denny forms an additional site for Denny that can deliver effective housing land. The Council is asked to consider an amended site area (Plan 2: Proposed Allocation) for new housing development. The amended site boundary includes land previously granted consent for upfilling (Ref: F/97/0915) and an area of land where approval was given for the conversion of the farm buildings to form 4 dwellings, together with three new dwellings (Ref: F/2001/0578). It is considered that new housing would not only result in an environmental enhancement but also allow for some cross-funding to restore the Category B Farmhouse and the attached steading (which form part of the listing) and which are in need of restoration. It is considered that the site should be elevated to a 'preferred' option, having regard to the Brownfield status of the site and the site assessment undertaken. The site is primarily Brownfield in status, which has been used for tipping and infilling, and not Greenfield as suggested by the assessment undertaken. It is suggested that para 80 of SPP (in regard to redevelopment of rural brownfield sites) and para 94 (in regard to rural housing clusters) could be taken into consideration in support of identifying the site for residential development in the forthcoming LDP

Council response: The site at Denovan Mains Farm has not been identified as a housing proposal in the Proposed Plan. The site forms a major extension to a small Local Plan allocation in the open countryside. The Local Plan allocation, and subsequent planning consents, were intended to provide the enabling development to upgrade the B-listed farmhouse. A large proportion of the undeveloped site area is rated as class 3/1 prime quality agricultural land and is partly affected by flood risk. The site has poor accessibility to services and community infrastructure. SPP does not give blanket support to rural brownfield development. Overall the site does not form a sustainable location for further development.

DEN/B Denny Potential New Sites

The Dimension Sandstone Site at Drumhead Quarry, near Denny should be allocated. The dimension stone available at the site is a valuable resource and would contribute to preserving many historic buildings in the Central Belt and Stirling where the stone was originally utilised. The stone would also contribute to the provision of new high quality indigenous building

Authority Response to Contributions by Contributor for FLDP_MAIN

material to the local market. At present there is an acute shortage of such stone in the Central Belt.

Council response: The site at Drumhead Quarry, near Denny has not been identified as a business proposal in the Proposed Plan. The site now has a 'minded to grant' planning permission for the extraction of Dimension Sandstone and it is considered more appropriate to safeguard the working of this resource through appropriate minerals policies RW02 and RW03 in the Proposed Plan.

00588 Grange Estate

Comments: 3

Main Issue 2: Sustainable Housing Locations

The preferred growth option for Bo'ness is supported. However, it should be noted that the existing Drum North site is effective and deliverable, as is the Drum South site which should be included in the LDP as a mixed use allocation. The long term future potential expansion of Drum should be anticipated.

Council response: Support noted.

Main Issue 3: Housing Need

In relation to the approach to housing need, there is a mismatch between the quota levels and the actual level of need in settlements. A more proportionate spread of provision according to need across the Council area would see Bo'ness on 10%.

Council response: The Council has adopted a two tier approach to applying its affordable housing requirement, 15% or 25%. The Bo'ness requirement is set at the lower 15% level to reflect the lower level of need there in comparison to more pressured areas. However part of the 15% requirement in Bo'ness can make a contribution towards meeting the overall need across the Council area.

Main Issue 4: Infrastructure for Growth

Concern is expressed about the proposal to make the Education and New Development guidance into statutory SG.

Council response: The conversion of SPG to SG is promoted by Scottish Government to give statutory status to the detail of important policy guidance. The conversion of Education and New Housing Development to SG will be subject to public consultation in the period following publication of the Proposed Plan.

00101 Grangemouth Community Council

Comments: 5

Vision

There is a conflict between the needs of the community in Grangemouth and industrial growth. There is particular concern that the infrastructure required for such growth will not be in place at the right time and there is not a timetable for its implementation. The proposed freight hub for Grangemouth and the associated influx of HGV's is also of concern. The vision of a network of communities in a green setting is at odds with recent consents and does not appear to include Grangemouth.

Council response: It is accepted that Grangemouth's economic role sometimes conflicts with community aspirations for regeneration and growth. Grangemouth Freight Hub is nonetheless identified as a National Development in NPF2 and this must be reflected in the LDP. The Proposed Plan includes infrastructure upgrades which will help to mitigate the impact of growth, and the early delivery of these is being progressed through the TIF initiative. Grangemouth will benefit from green network proposals in the Proposed Plan, notably the Helix.

Main Issue 2: Sustainable Housing Locations

The preferred option of no new housing for Grangemouth is not supported and references to constraints should be more measured given recent consents such as at Earlsgate. The PADHI assessment requires to be reviewed following this large scale consent in the inner zone of a consultation distance. The demolition and rebuild of housing stock is of particular relevance in Grangemouth given the lack of land for housing development and should be referenced in the plan.

Council response: The proposed plan acknowledges in policy BUS05 that there are constraints to development in Grangemouth and as housing is assessed differently by the HSE there is less scope for further development than for business uses. BUS05 also seeks to take into account existing uses on sites and regeneration opportunities recognising that a pragmatic approach to development may be required.

Main Issue 7: Employment Land

Support for the growth of the petrochemical industry appears to be at odds with the removal of Kinneil Kerse as a site for growth. At the same time "My Future's in Falkirk" came about because of the withdrawal of BP from the area. There will continue to be conflict with the major hazards policies and non major hazard development particularly when development is granted in the inner zone for non hazard related development. There is a contradiction with the retention of existing major hazard policies to manage and control development and non chemical developments being granted permission within the existing inner zones. The direction of development in the port needs clarification with Forth Ports presenting a number of different options in recent times. Support for town centres is at odds with allowing large scale out of town developments and it is considered that the development of the Falkirk Gateway would have an adverse impact on Grangemouth town centre and its required improvements. Consideration should be given to providing employment opportunities closer to expanding communities as there is an issue with housing growth in the west and development opportunities in the east leading to traffic pinch points. On the rail system there is a potential conflict between the EGIP project and freight movement in and out of the proposed Distribution Hub. With freight ending up being moved in and out of Grangemouth by road to a road/rail freight facility.

Council response: The allocation of the Kinneil Kerse site is not considered justified. It is no longer required to be safeguarded by national policy, and there is no demonstrable need for additional land for petrochemical development, bearing in mind the substantial vacant or underused land available within the existing petrochemical complex. There are potential significant impacts on the adjacent Firth of Forth SPA, and the site may also be subject to flooding issues. It is accepted that Grangemouth's economic role sometimes conflicts with community aspirations for regeneration and growth. Nonetheless the Grangemouth petrochemical and chemical sector remains strong and presents good opportunities for growth over the plan period. Grangemouth also remains Scotland's largest port with growing container traffic and potential for growth as part of the Grangemouth Freight Hub, which is identified as a National Development in NPF2 and which must be reflected in the LDP. The spatial strategy of the Proposed Plan is to focus on the existing major economic development opportunities in the M9/M876/A801 corridor, on the basis that these are best placed to attract significant inward investment to the area. These are augmented by other local business sites within communities across the Council area. The EGIP proposals (INF08) continue to include electrification of the Grangemouth freight branch in later development phases.

Main Issue 10: Climate Change

While key objectives are good the reality is of development which will increase emissions such as the freight hub and the new Asda facility which also sees mature woodland destroyed.

Council response: Comments noted.

Main Issue 14: Waste and Minerals

The continuation of local plan policy to support the provision of waste infrastructure through extensions to existing facilities or in existing industrial areas is of concern as Grangemouth may appear to be an industrial town and therefore capable of absorbing such development and a new waste management facility has recently been consented on a main road into Grangemouth. More emphasis should be placed on waste reduction initiatives.

Council response: The waste hierarchy preference is for prevention, followed by reduction, reuse, recycling and energy recovery over waste disposal. In support of this the Zero Waste Plan requires the Council to include supportive policies in the LDP for waste management facilities which include industrial sites as potential locations.

00499 Grangemouth Gospel Trust

Comments: 1

POL/B Polmont Potential New Sites

The Grangemouth Gospel Trust seeks an extension of the village limit at Bo'ness Road/Smiddy Brae to include a potential site for residential development.

Council response: It is not considered appropriate to identify this site within the Proposed Plan. The site straddles the Antonine Wall WHS and would have significant historic environment impacts. There would also be adverse impact on the integrity of the Green Belt. It is also an awkwardly shaped site which does not represent a logical extension of the existing village.

01002 Grant George

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01036 Grant Moira

Comments: 1

Main Issue 2: Sustainable Housing Locations

Object to any further housing in Slamannan as increase to traffic using Slamannan Road, Falkirk will impact on residential amenity in Slamannan Road.

Council response: The scale of housing proposed in Slamannan has been reduced in the Proposed Plan, and, given market conditions and development constraints, it is not anticipated that it will come forward in the initial 2014-2024 period of the plan. It is unlikely that the extent of housing proposed, and associated vehicle trips, would have any significant effect on the amenity of Slamannan Road, Falkirk.

01060 Grant Sara

Comments: 1

SHIE/B Shieldhill Potential New Sites

Support for housing site at Hillcrest (SHIE/B/02)

Council response: Support noted. The site is identified as a housing proposal in the Proposed Plan.

00855 **Greenhow Brian**

Comments: 1

MUR/B Muirhouses Potential New Sites

Concerns are expressed about the proposed housing development at Muirhouses (MUR/B/02). This will introduce additional traffic to Carriden Brae which is busy and sub standard. Additional traffic will cause more wear and tear on the road. There is also a parking problem with the new cemetery. Questions are also raised about drainage capacity and the disruption which service upgrades may cause. Although screened by trees from existing housing on Carriden Brae, the proposal represents creeping urbanisation.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. Further assessment suggests that there will be substantial impacts on trees and hedgerows which would have an adverse impact on the setting of the village and Carriden Estate. Public consultation has raised concerns about traffic issues on Carriden Brae.

00847 **GreenPower International Ltd.**

Comments: 1

Main Issue 10: Climate Change

By adopting a spatial strategy where the location of wind farms is pre-determined, there is a risk that economically viable schemes cannot proceed. The SPP is clear that within a spatial strategy, criteria-based policies should be included in order to consider sites on their own merits. Further landscape capacity work should recognise that technology has moved on significantly since the 2003 study and that some visual effects are mitigated by the fact that there are slightly larger, but few turbines within schemes. The spatial framework should not be overly prescriptive, particularly with regard to aviation and radar constraints. Denny Muir was also identified as an area with potential as part of the 2003 BMT COrdah study and developers have been actively pursuing sites in this locality. It must not be reclassified within any future study as it would have significant commercial consequences during this difficult economic time.

Council response: In line with requirements set out by the Scottish Government in SPP, the Council is producing a Wind Energy Spatial Framework and Supplementary Planning Guidance which will set out guidance for wind energy developments within the Council area. It is intended that the guidance will safeguard more sensitive areas, and direct development to more appropriate locations. It is intended that the Spatial Framework and guidance will aid developers in identifying constraints.

00445 **Greenwells Developments**

Comments: 1

POL/B Polmont Potential New Sites

Greenwells Developments are seeking the inclusion of land at Greenwells Farm (POL/B/2 & POL/B/3) as a preferred option and have produced a revised indicative layout to address concerns in the site assessment and reduce the overall development area. The site now benefits from increased accessibility, and extension of the 30mph speed limit along California Road, together with increased road width and footpath provision will result in improved road safety. Initial transportation capacity has been undertaken and Greenwells Developments would be willing to undertake further analysis. The revised plan shows that the revised capacity and layout would contribute to the Green Network and would support habitat creation within the site. It is considered that this site is deliverable and effective and should be identified as a preferred site instead of Sunnyside Road (POL/B/15) which is not considered to be effective and deliverable due to landowner being reluctant to take the site forward.

Council response: The site would represent a significant western expansion of Maddiston/Rumford into the countryside. The site is prominent, and landscape impacts would be significant. Accessibility is only low to moderate. With capacity issues at Maddiston PS limiting the overall scale of growth in the area, this is not considered to be as suitable a site for growth as areas at Parkhall East, where the Strategic Growth Area can be co-ordinated with infrastructure delivery.

00993 **Grimwood Anne E**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00463 **Hall Sheila**

Comments: 1

General

The current Local Plan is regularly ignored by the Council. No point in commenting on new proposals because these will also be ignored if it suits the Council. 'Consultation' means telling residents what Council has decided.

Council response: Comment noted. Consultation on the MIR has informed and influenced the preparation of the Proposed Plan.

00672 **Hallam Land Management**

Comments: 2

Main Issue 2: Sustainable Housing Locations

Hallam Land supports the preferred growth option for Denny which reaffirms commitment to existing sites as well as modest expansion, largely through extensions to Carrongrove, Mydub and Broad Street sites.

Council response: Supportive comment noted

DEN/B Denny Potential New Sites

Hallam Land support the preferred option to extend the existing site at Broad Street to include further land to the east. The proposal will allow for business and industrial expansion towards the western end of the masterplanned site with residential development to the east. It is estimated the combined site has a capacity of 220-250 units. The main access for the residential element will be from the existing roundabout on the A883.

Council response: The Broad Street extension site has been identified as a mixed use proposal in the Proposed Plan with a capacity of 200 units for the combined site. The site forms a large extension to the adjacent committed Broad Street site, allowing expansion of the urban limit up to the green belt boundary. Its development phasing will be linked to the build out of the main Broad Street site. It offers potential for a more satisfactory place-making solution to the mix of land uses than the Broad Street site alone. Layout and design should avoid the area of prime agricultural land and the area at risk of flooding in the north-east corner of the site, and mitigate any impacts on protected species habitats close to the River Carron.

00888 **Hallows Valerie**

Comments: 1

Main Issue 2: Sustainable Housing Locations

Development of housing on sites POL/B/13,15 & 17 is not supported. Local infrastructure (particularly transportation, healthcare and education) will not be able to cope with the scale of development envisaged on all of these sites.

Consideration should be given to increasing the capacity of car parking facilities at Polmont Station.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00821 **Hamilton**

Comments: 1

POL/B Polmont Potential New Sites

Would not support further development at Sunnyside Road. Wider concerns re the level of development on 'Green Belt' and Countryside land in the Wallacestone area. Further development would destroy the semi-rural feel of the community. There are specific concerns re road safety and the amount of traffic on Sunnyside Road which will be exacerbated by further development. There are education capacity issues at Wallacestone Primary and my child had to attend St Margaret's Primary which is outwith the given catchment.

Council response: No housing growth is proposed in the area to the south of Brightons. The Sunnyside Road site is not identified as a housing proposal in the Proposed Plan in recognition of effectiveness and school capacity issues.

00784 **Hamilton & Kinneil Estates**

Comments: 8

Vision

Support for positive message in MIR, but range and choice of housing locations is needed to meet requirements of SPP. Concern that paragraph 2.17 suggests a strategy of restraint and that housing requirements for the area should be met in full..

Council response: Support welcomed. Strategy is confirmed as one of sustainable growth, and a good range and choice of sites is provided.

Main Issue 1: Housing Growth

Object to the preferred option of medium growth. This does not reflect the outcomes of the HNDA and is contrary to SPP. Council seeks to artificially reduce additional housing requirement despite there being no serious environmental or infrastructure constraints. Unacceptable that current allocations are relied on to meet requirements to 2024 and that the MIR fails to deal with additional requirement over and above Local Plan additional supply from 2012 onwards. The higher rate of growth option should be adopted to meet requirements of HNDA and SPP.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The area is subject to various environmental and infrastructure constraints which are clearly outlined in the MIR and supporting technical reports. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SRRs at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing Locations

Housing figures and proposed distribution of housing does not provide for meeting housing needs in respective areas. Land for at least 340 dwellings in Rural South as opposed to 270 should be identified. This points to the need for greater flexibility for both the additional housing requirement and locations. The second alternative option promoting a different pattern of modest settlement expansion including California, should replace the preferred option. The third alternative option relating to expansion through rural housing clusters is not supported.

Council response: The provision of housing in the Rural South area in the Proposed Plan is considered to be generous, with over 1000 units in the existing supply, and an additional 70 units allocated through the plan. Sites are allocated in all of the Rural South villages.

Main Issue 3: Housing Need

Housing need should be met in full in accordance with SPP. Affordable housing requirements in Falkirk must also be met in full.

Council response: Comment noted. Proposed Plan policy HSG02 and its accompanying SG are intended to fulfil the affordable housing supply target set out in the LHS.

Main Issue 4: Infrastructure Growth

The LDP must adopt an infrastructure-led rather than an infrastructure-dependent strategy to deliver housing and other development. The preferred option to minimise additional significant infrastructure is not appropriate when development requirements dictate that investment is required.

Council response: In the light of continuing restrictions on public and private sector finances which constrain the scope to undertake major new infrastructure works, the moderate growth strategy of the LDP, making best use of existing resources, is considered prudent.

Main Issue 6: Countryside

Support for preferred option concerning housing in the countryside.

Council response: Support noted.

CAL/A California Committed Sites

Understood that this site at Church Road 2, California (CAL/A/04) is no longer to be promoted for residential use, and that as the site cannot be considered to be effective, it should not be identified for housing in the LDP.

Council response: The Church Road site is identified in the Proposed Plan as an existing supply site (H64). It is considered that it can be effective within the initial 10 year period of the plan.

CAL/B California Potential New Sites

The site at Reddingmuir Farm, California (CAL/B/02) would provide an additional, sustainable, accessible and effective housing opportunity at California, set within a landscaped framework and rounding off the northern edge of the village. Representation is made to the non-identification of the site for housing and the site assessment comment that the site is land locked.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. The site occupies an elevated position and development would result in the expansion of the village over the skyline. Existing committed sites in California are considered sufficient, and there is no need for additional growth.

00903 Hammerson UK Properties

Comments: 1

Main Issue 8: Town Centres and Retail Provision

The preferred option for town centres is supported in principle. However, the MIR's position of maintaining restrictions on the range of goods within Phase 2 of Central Retail Park is at odds with the emphasis on diversification of uses and activities promoted in the preferred option. The policy approach needs to be flexible within the Retail Park so that retailers' requirements can be accommodated, and so that the Retail Park can respond positively to changes in household goods retailing that may occur should the Falkirk Gateway development proceed.

Council response: The Proposed Plan requires any proposals within Central Retail Park to comply with the provisions of the Section 75 Agreement. The Agreement gives a high degree of flexibility, which has allowed the Retail Park to adapt to changing economic circumstances. It will be kept under review.

00772 Hansteen Land Ltd

Comments: 4

Main Issue 1: Housing Growth

There should be an additional allowance of 30% to cover effective sites not being developed. Falkirk should follow the approach of Stirling and provide a step by step approach through policy to allow sites to come forward if the housing land supply fails without the need for a development plan review. In line with the approach taken by Edinburgh and Lothian Structure Plan the trigger to bring forward such land should be the point where delivery on effective sites falls below 90% of the required output. The LDP should plan for an earlier return to growth than anticipated. There is also a concern that infrastructure constraints will slow housing delivery.

Council response: The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SIRR at Bo'ness Foreshore and Slamannan. The allocated sites, with a flexibility of 15% (i.e. Around 1000 houses), offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing Locations

Gilston (POL/C/01) is allocated for development in the Local Plan and has planning permission. The site history shows there is an acceptance that the natural boundary of Polmont extends to A801/A803. The site is considered effective at this stage. Provision of housing within the mix of uses could integrate with existing housing. The preferred option for Polmont specified at paragraph 3.55 should be discounted in favour of the major growth option specified at paragraph 3.58. Polmont has excellent transport links. It adjoins A801, A803 and junction 4 of the M9 and has a railway station. The allocation of Whitecross shows that the Council considers this an area that is suitable for housing growth.

Council response: The site is currently allocated for business use with range of impacts which will require mitigation. Whilst introduction of residential use may not necessarily raise additional environmental issues, it has yet to be demonstrated how residential use could be successfully integrated into the masterplan. The site remains of strategic economic development importance, and residential use could constrain its employment potential. Site is potentially important for green network development with structural landscaping helping to contribute to green corridors in the area.

Main Issue 7: Employment Land

The preferred option specified at paragraph 4.13 to reaffirm the existing portfolio of strategic sites is supported. We welcome the flexibility provided by the final sentence of that paragraph, which states: "Additional flexibility in the permitted range of uses within the sites would be promoted where appropriate to their location, function, amenity and general character." This provides the flexibility to consider alternative uses such as residential and retail within the context provided by the employment consent and development plan allocation at Gilston. Our submission to the Issues and Options consultation explains how this could be achieved.

Council response: Support noted.

Main Issue 8: Town Centres and Retail Provision

The preferred option for town centres and retailing, which includes consideration of the need for new retail facilities, is welcomed. There is a shortage of non food retail and that there is capacity within the Gilston catchment. We have argued that there is scope to amend the Masterplan for Gilston without undermining its objectives.

Council response: Comments noted. There is no evidence of a shortage of land for non-food retail. Extensive provision has been made at the Falkirk Gateway, and demand remains low. Neighbourhood retail facilities have been included in the Gilston masterplan.

00759 Harley Yvonne

Comments: 1

SHIE/B Shieldhill Potential New Sites

Concern that development at Hillcrest Farm, Shieldhill (SHIE/B/02) between Shieldhill and Reddingmuirhead will lead to coalescence of settlements and loss of rural identity, and that development will have a detrimental impact on wildlife. Concern also about impact on existing infrastructure including Braes High School. Shieldhill has limited access to jobs and bus service is limited.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

00849 Headswood Investments Limited

Comments: 4

Main Issue 1: Housing Growth

Headswood Investments do not support the medium growth strategy of 725 per annum as that will not meet demand requirement of 900 per annum in HNDA. Employing a flexibility allowance of 29% above medium growth of 725 per annum does not meet SPP requirements, where flexibility should be in addition to the supply required to meet demand. The LDP should follow the second alternative and plan for the higher growth scenario in order to meet demand in full and accord with government policy.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable housing Locations

The proposed strategy for Denny is for 'modest' settlement expansion and 350 units are identified over the plan period. This development is focused on the expansion of large scale sites at Mydub, Carrongrove and Broad Street. However, this does not provide sufficient choice and the Council should look to identify additional sites that can deliver choice of housing type and tenure to meet demand. Therefore, in addition to the sites proposed in the plan, the Council identify further options for development on sites that are close to existing settlements that are capable of being delivered in the short to medium term.

Council response: The Proposed Plan provides for a mix of large and small sites to meet the Denny settlement additional housing requirement of 408 homes by 2024. The development of suitable windfall sites on land within the urban limit under policy HSG03 can provide further housing choice.

Main Issue 6: Countryside

Headswood Investments support the first alternative option for Housing in the Countryside, which proposes a further relaxation of this policy and the redevelopment of brownfield land in the countryside for housing. This would accord with Scottish Planning Policy, which directs development to brownfield sites and will reduce pressure on the green belt.

Council response: Allowing housing development on brownfield sites generally in the countryside is not considered a sustainable approach. The number of rural sites which could be considered brownfield would be such that this would lead to extensive sporadic development in locations likely to be dependent on the private car.

DEN/B Denny Potential New Sites

Headswood Investments recommend that the Council allocates Headswood Mill, Denny for mixed use development,

Authority Response to Contributions by Contributor for FLDP_MAIN

including housing and commercial development, in the Proposed Plan. They suggest that the Council identify further options for development on sites that are close to existing settlements that are capable of being delivered in the short to medium term. SPP encourages the redevelopment of brownfield sites, such as this, in the countryside before the consideration of greenfield sites.

Council response: The Headswood Mill site has not been identified as a housing proposal in the Proposed Plan. About a third of the site is subject to flood risk. The site has poor accessibility to services and community infrastructure, and current site access from either the substandard Denovan Road or to the A883 is considered suboptimal unless a new bridge is provided to the latter. Overall the site does not form a sustainable location for the proposed residential and care home development where connectivity would be overwhelmingly dependent on the private car.

00473 Health and Safety Executive

Comments: 4

General

There is insufficient detail in the document to assess proposals against PAHDI. No comprehensive assessment of the MIR is possible.

Council response: Comment noted. Individual allocations will be clear in the Proposed Plan and it is hoped this will allow a more detailed appraisal by the HSE.

Main Issue 8: Town Centres and Retail Provision

Grangemouth Town Centre lies within the consultation zone of various major hazards and this could affect redevelopment in the area.

Council response: Comment noted. Major hazard restrictions will be considered as part of Grangemouth Town Centre regeneration opportunity highlighted in the Proposed Plan.

FAL/A Falkirk Committed Sites

In relation to the site at Etna Road 2 (FAL/A/26), HSE records indicate there is still a consultation zone associated with hazardous substance consent at this location. It will not be removed until formal notification is received.

Council response: Comment noted.

GRA/A Grangemouth Committed Sites

The site at Wood Street, Grangemouth appears to lie within middle zone of the Calachem hazard site. Development may be restricted.

Council response: Comment noted. Major hazard restrictions at Wood Street have been considered. Eastern end of site is subject to a 'minded to grant' approval for housing. The remainder of the site is in an industrial/business area with potential for redevelopment where PAHDI rules would be applied to any proposals.

00822 Hill Brian and Maureen

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of village. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure (particularly transportation and education) will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

01015 Hill K

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00896 Hill Steve

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of the village. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure (particularly schools, roads and healthcare) will not be able to cope with the scale of development envisaged on all of these sites to the detriment of road safety.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00983 Homer June

Comments: 1

Main Issue 2: Sustainable Housing Locations

Development of sites POL/B/02,03,14,15 & 17 for housing is not supported as local infrastructure (particularly schools, healthcare and roads) does not have the capacity to accommodate the proposed scale of development. In addition the development of these sites would lead to a loss of valuable countryside areas.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00284 Homes For Scotland

Comments: 4

Main Issue 1: Housing Growth

Homes for Scotland believe that Falkirk Council has not allocated sufficient land to meet the needs and demands identified within the HNDA. The Council's preferred strategy is to plan for 'medium' growth, which equates to 725 units per annum. However, the HNDA indicates a housing requirement of around 900 units per annum. As Falkirk Council has identified less land than is deemed necessary by its own HNDA, it is contrary to the general principles set out in Scottish Planning Policy. The Council has not provided any justification to plan for a lesser level of growth other than that it is a continuation of the current Structure Plan (726/annum), and that historic averages over the last 15 years have been 738/annum. We have seen other authorities drafting early drawdown mechanisms to allow second phase sites to come forward to meet shortfalls in the first phase delivery, and would strongly recommend that Falkirk Council considers something along these lines. Homes for Scotland are concerned about the effectiveness of the existing land supply. If a large proportion of sites in the existing supply are either no longer effective, or have reduced output levels, further sites will need to be identified to augment the land supply.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SRRs at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 3: Housing Need

Homes for Scotland is concerned that there is no reference to the Local Housing Strategy in the MIR. The LHS must not only set out the number of affordable houses required, but should also be clear about the type of low cost housing units required in each area. The affordable housing policies must include percentage figures appropriate to the areas that are fully justified by reference to all relevant factors. In order for Homes for Scotland to support the preferred option, clearer evidence of the justification of the locational percentages would be required to be demonstrated within the LDP itself, with references to the LHS and HNDA.

Council response: References to the LHS, the distribution of affordable housing need which informs the choice of percentage requirement, and the affordable housing supply target is contained in revised Technical Paper 3 Housing Requirements. The HNDA is referred to in the supporting text for Proposed Plan policy HSG02. The policy also states that details of the types of affordable housing will be set out in Supplementary Guidance.

Main Issue 4: Infrastructure for Growth

Homes for Scotland agrees that the preferred option is the most suitable option. Whilst we note that developer contributions will continue to be sought, they should always be fully justified, and only used to mitigate the detriment caused by development.

Council response: Proposed Plan policy INF2 and related SG concerned with developer contributions highlight need for S75s to comply with the provisions of Circular 3/2012. Requirements for developer contributions are set out for all relevant proposals in the Site Schedule of the Proposed Plan.

Preferred Spatial Strategy

The first phase of the plan relies on the existing regeneration initiatives and commitments. Homes for Scotland is concerned that some of these may no longer be deliverable. For example, we understand that the Bo'ness Foreshore project may be under threat, with the loss of 750 units from the supply. There should be a clearer indication of how Falkirk Council intends to respond to any potential lack of delivery in the first phase. Proposals for bringing forward second phase sites should be set out, or supplementation of the Plan with additional sites, that can be delivered in the required timescales.

Council response: The first phase of the plan does not entirely rely on existing commitments. Additional new sites are also identified. The housing land supply has also been reviewed, and the effectiveness and phasing of commitments revised. Bo'ness Foreshore, for example, has been deferred to beyond 2024.

00988 Howie Yvonne

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00803 **Htet-Khin Roddy**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of village. Sites POL/B/13 & 17 are not supported. Local infrastructure (particularly transportation and education) will not be able to cope with the scale of development envisaged on all of these sites to the detriment of road safety.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00845 **Hunter Hugh**

Comments: 2

Main Issue 2: Sustainable Housing Growth

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of village and have a detrimental effect on local landscape character, amenity and wildlife. For the same reasons development of new housing between Reddingmuirhead and Wallacestone is also not considered to be appropriate.

Development of any new housing in the Polmont area is not supported as local infrastructure (particularly schools, transportation and sewerage) will not be able to cope with additional development.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

Main Issue 5: Green Belt

A green belt area to the south of Polmont, including the area to the south of Sunnyside Road, would be supported.

Council response: This extension of the green belt into this area is not considered appropriate, although countryside policies will continue to protect the area from development over the period of the plan. The primary purpose of green belt in the Proposed Plan is to separate major communities, and the land to the south of Polmont does not fit this criterion.

00793 **Hunter Rita**

Comments: 1

RUR/B Rural Area Potential New Sites

RUR/B/02 Blackbraes: Housing in Blackbraes will help regeneration.

Council response: No allocation has been made at Blackbraes in the Proposed Plan. The site is located in the countryside outside the boundary of existing settlements and its development would be considered to be unsustainable due to the distance from existing services. The site furthermore does not correspond with the footprint of the former community at Blackbraes. Allocated sites in the wider Rural South area are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

00609 **I and H Brown Limited**

Comments: 3

Main Issue 2: Sustainable Housing Locations

The package of physical and community infrastructure improvements proposed to be delivered by the larger developments within the Banknock SIRR is likely to require the signing of a development agreement between the three main landowners (Falkirk Council, JB Bennett (Contracts) Ltd and I & H Brown Ltd) to assist delivery of the necessary infrastructure on an equitable basis. An allocation of 280 new residential units in the Banknock area is likely to require additional significant infrastructure (over and above that already planned as part of the SIRR) and a renegotiation of the development agreement. The proposed transport mitigation set out within the TA of the current planning application for the Cannerton Brickworks site, in Falkirk Council's opinion, is unlikely to extend to addressing the additional transport impacts from the additional 280 housing units proposed within the Main Issues Report (MIR). This position has been expressed by Falkirk Council through requiring a condition of planning permission on I&H Brown's current planning application, restricting the development of this site to 504 residential units due to perceived highway capacity issues. It is suggested that Falkirk Council will require to satisfy themselves that the roads network has the capacity to accommodate the proposed additional development.

Council response: Comment noted. Only one additional opportunity for housing growth has been identified along the A803 corridor between Coneypark and Dennyloanhead as part of the Proposed Plan. As only a further 20 houses are planned to be built as part of this opportunity, it is considered unlikely that this will lead to a requirement for significant additional infrastructure.

Main Issue 2: Sustainable Housing Locations

The foul sewerage network within Banknock is at capacity at the present time. A retrofitting solution has been proposed as part of the planning application for the Cannerton Brickworks site to allow up to 750 houses within Banknock to connect to that foul sewerage network. Additional engineering solutions may be required to deliver sufficient additional capacity within the foul sewerage network, to accommodate the additional 280 dwelling units proposed. This would require to be fully examined prior to allocating this site for development to aid in demonstrating the effectiveness of this site.

Council response: Comment noted. Only one additional opportunity for housing growth has been identified along the A803 corridor between Coneypark and Dennyloanhead as part of the Proposed Plan with a capacity of 20 houses. It is anticipated that a technical solution could be found to retrofit the existing combined sewerage system to enable enough capacity to accommodate the development of this site.

Main Issue 2: Sustainable Housing Locations

An allocation of 280 new residential units in the Banknock area could result in market saturation which could directly affect the development of the SIRR in Banknock. The residential housing market is relatively flat at this time and, in our opinion, would certainly not support a further 280 units. I&H Brown would strongly advise against Falkirk Council including these additional allocations in the LDP at this time.

Council response: Comment noted. Only one additional opportunity for housing growth has been identified along the A803 corridor between Coneypark and Dennyloanhead as part of the Proposed Plan. As only a further 20 houses are planned to be built as part of this opportunity, it is considered unlikely that this will lead to housing market saturation.

00805 **Imrie Graeme**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of village. Sites POL/B/02,03,13,15 & 17 are not supported. Local infrastructure will not be able to cope with the scale of development envisaged on all of these sites to the detriment of road safety and local amenity.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00470 **J B Bennett (Contracts) Ltd**

Comments: 1

Main Issue 2: Sustainable Housing Locations

The package of physical and community infrastructure improvements proposed to be delivered by the larger developments within the Banknock SIRR is likely to require the signing of a development agreement between the three main landowners (Falkirk Council, JB Bennett (Contracts) Ltd and I & H Brown Ltd) to assist delivery of the necessary infrastructure on an equitable basis. An allocation of 280 new residential units in the Banknock area is likely to require additional significant infrastructure (over and above that already planned as part of the SIRR) and a renegotiation of the development agreement. An allocation of 280 new residential units in the Banknock area could result in market saturation which could directly affect the development of the SIRR in Banknock. The residential housing market is relatively flat at this time and, in our opinion, would certainly not support a further 280 units. JB Bennett would strongly advise against Falkirk Council including these additional allocations in the LDP at this time.

Council response: Comment noted. Only one additional opportunity for housing growth has been identified along the A803 corridor between Coneypark and Dennyloanhead as part of the Proposed Plan. As only a further 20 houses are planned to be built as part of this opportunity it is considered unlikely that this will lead to a requirement for significant additional infrastructure or housing market saturation.

00857 **J Paul and Son**

Comments: 5

Main Issue 2: Sustainable Housing Locations

A high growth housing option should be pursued in Bo'ness with the emphasis on development to the east of the town, which would not involve the need for green belt release.

Council response: The level of growth identified for Bo'ness for the period 2014-2024 is considered generous and appropriate, in relation to the size of the settlement, offering substantial new opportunities for housing, particularly to the south east of the town, with the development of Bo'ness Foreshore available as a longer-term option.

BNS/B Bo'ness Potential New Sites

The Council should reconsider the 'non-preferred site' status of the site at Carriden, Bo'ness (BNS/B/04) and allocate it for development. Either the whole site could be allocated, masterplanned to fit with the landscape, or a smaller site at the west end could be selected.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. The site does not relate well to the existing settlement. There would be potential adverse impacts on the green network and the setting of Carriden Church, and potential noise/odour issues associated with the adjacent industrial area.

MUR/B Muirhouses Potential New Sites

The identification of East Muirhouses 1 (MUR/B/02) as a preferred site for development is supported. However, the capacity of the site should be increased from 30 to 50 in keeping with density of existing housing in the vicinity.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. Further assessment suggests that there will be substantial impacts on trees and hedgerows which would have an adverse impact on the setting of the village and Carriden Estate. Public consultation has raised concerns about traffic issues on Carriden Brae.

MUR/B Muirhouses Potential New Sites

The East Muirhouses 2 site (MUR/B/03) should be identified as a preferred site for development. Together with East Muirhouses 1 this is the most appropriate location for the future growth of the town and would constitute a logical extension to the settlement of Muirhouses.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. The scale of development, in tandem with East Muirhouses 1, is considered to be large in relation to the size and character of the existing village. There will be substantial impacts on trees and hedgerows which would have an adverse impact on the setting of the village and Carriden Estate. Public consultation has raised concerns about traffic issues on Carriden Brae.

MUR/B Muirhouses Potential New Sites

The walled garden at Carriden, Bo'ness (MUR/B/01) should be identified as a housing opportunity. Whilst its listed status is acknowledged, a high quality, low density development could be achieved which would bring it back into use.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. There would be significant adverse built heritage impacts arising from development of the walled garden. New/upgraded access from Carriden Brae would have significant impacts on trees and hedgerows

00908 James Jones and Sons Ltd

Comments: 2

Main Issue 2: Sustainable Housing Locations

Focusing additional housing growth on one village in the Rural North could compromise the growth of the other villages in the area throughout the period of the plan. The second alternative identified in paragraph 3.63 of the Main Issues Report is supported in part. This states: 'to promote modest settlement expansion at Torwood and Letham...' Torwood should be identified as a location for further housing allocation, of an appropriate scale.

Council response: The Proposed Plan supports modest growth in Rural North, in line with the MIR preferred option. Section 5 of Technical Report 3 provides the rationale for the level of growth considered suitable and the choice of sites in each of the settlement areas. In Rural North the focus of growth remains the existing sites at Airth, augmented by an additional site at the north end of the village, and existing sites at Torwood.

TOR/B Torwood Potential New Sites

James Jones and Sons wish the site at Castle Crescent North, Torwood (TOR/B/02) to be considered for a low density residential development allocation in the LDP. The woodland largely covering the site is suitable for somelow density housing as part of the wider management of the woodland. The former drive to Carbrook House can be reinstated to provide access to the site.

Council response: The site at Castle Crescent North, Torwood has not been identified as a housing proposal in the Proposed Plan. This medium sized site is currently used as grazing land, is partly grade 2 prime agricultural land and although visually well-contained by existing woodland, is ecologically sensitive. The village has no services and poor accessibility to the nearest services and community infrastructure in Larbert. Further housing will put additional pressure on Larbert High School capacity and the overstretched waste water infrastructure. The village has seen considerable incremental growth in relation to its size over recent years, and further significant growth is therefore not considered appropriate.

00780 Jarvie Jim

Comments: 1

POL/B Polmont Potential New Sites

The site at Middlerigg Farm, Reddingmuirhead should not be developed for housing. This will result in the loss of the last open space in the village. The main concerns are schooling, transport, lack of open space and wildlife/protected species issues. Development should be directed to other villages which have better infrastructure.

Council response: The site has not been included as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00575 Johnston Angus

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of the village. Sites POL/B/02,03,13 & 17 are not supported.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00905 Johnston Press

Comments: 2

Main Issue 8: Town Centres and Retail Provision

The boundary of Camelon Local Centre should be redrawn to include the new Tesco and the Glasgow Road 1 site (FAL/B/06).

Council response: This change is considered to be appropriate and has been incorporated into the Proposed Plan.

FAL/B Falkirk Potential New Sites

Continued employment use on the Glasgow Road 1 site (FAL/B/06) is not realistic given the long term vacancies along Glasgow Road and competing sites elsewhere in Falkirk. Consideration should be given instead to a single or mixed use development which could include retail, residential or leisure/hotel, to encourage the re-use and regeneration of this site and the surrounding area and to promote suitable links from the train station.

Council response: The site is identified as an economic development proposal in the Proposed Plan, with proposed uses including retail, business or leisure. The site is also included within the Camelon Local Centre. This provides sufficient flexibility to facilitate its regeneration.

00839 Keiller Edinburgh Ltd.

Comments: 1

POL/B Polmont Potential New Sites

Support preferred option for the Polmont area and the allocation of Parkhall East (POL/B/06) as a preferred site. Keiller are keen to bring this site forward.

Council response: Support welcomed.

00770 **Kemp Jason**

Comments: 2

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the landscape character of the local area. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure will not be able to cope with the scale of development envisaged on all of these sites which will have an adverse impact on the quality of life of existing residents.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

Main Issue 5: Green Belt

The area to the south of Falkirk and Polmont (i.e. the south of Sunnyside road/Standrigg road and towards California) should be designated as a green belt.

Council response: This extension of the green belt into this area is not considered appropriate, although countryside policies will continue to protect the area from development over the period of the plan. The primary purpose of green belt in the Proposed Plan is to separate major communities, and the land to the south of Falkirk/Polmont does not fit this criterion.

00438 **King Alex**

Comments: 13

Vision

The preferred vision is supported.

Council response: Support welcomed.

Main Issue 1: Housing Growth

Growth needs careful control in terms of its placement.

Council response: Comment noted.

Main Issue 5: Green Belt

The green belt should remain as it is around Bo'ness.

Council response: The proposed green belt release is considered to be justified given its limited scale and impact on the overall function of the green belt in the vicinity.

Main Issue 6: Countryside

The changes to countryside policy are supported, as long as they are carefully considered and not abused.

Council response: Comment noted.

Main Issue 8: Town Centres and Retail Provision

There is too much focus on Falkirk Town Centre.

Council response: The spatial strategy offers support to all centres within the Council area, and this has been reflected in the spread of investment and regeneration effort over the last 10 years. The Council has been undertaking a rolling programme of town centre regeneration schemes in all its main centres, with Bo'ness and Stenhousemuir having been completed and Denny, Grangemouth, and Falkirk underway, and included in the Proposed Plan.

Main Issue 9: Strategic Access and Sustainable Travel

Whilst the upgrading of Junction 3 on the M9 could improve movement, the supermarket which will help to fund it will be detrimental to Bo'ness Town Centre.

Council response: Proposed plan proposal INF05 provides for the safeguarding of land for west facing slips and Falkirk Council has recently granted planning consent for the northern slip road. The decision on the proposal for a supermarket is for West Lothian Council to make, although Falkirk Council has made comments which draw attention to potential adverse impacts on Bo'ness Town Centre.

Main Issue 10: Climate Change

Wind turbines are unsightly and their efficiency is questioned.

Council response: In line with requirements set out by the Scottish Government in SPP, the Council is producing a Wind Energy Spatial Framework and Supplementary Planning Guidance will set out guidance for wind energy developments within the Council area. It is intended that the guidance will safeguard more sensitive areas, and direct development to more appropriate locations. The efficiency and output of turbines is not a planning consideration.

Main Issue 12: The Green Network

More emphasis needs to be put on Kinneil woodlands and paths.

Council response: A distinct green network opportunity has been identified at Kinneil Estate (GN14). The opportunity seeks to develop visitor facilities at the Kinneil Estate together with continuing the management of the estate woodland.

Main Issue 13: Cultural Heritage

Kinneil House and James Watt's cottage should be restored.

Council response: Comment noted. Kinneil is a tourism node within the Proposed Plan spatial strategy which would support built heritage enhancement in general terms. However, any specific restoration projects would need to be assessed with relevant parties in relation to conservation objectives for the relevant historic buildings and resources available.

Main Issue 14: Waste and Minerals

Question as to whether all waste facilities are subject to strict regulation and enforcement.

Council response: The comments are noted. Waste management facilities are required to address environmental impact and existing waste management sites are conditioned through planning applications or through SEPA licensing controls.

Main Issue 7: Employment Land

Provision should be made in the plan for an extension to the Bo'ness and Kinneil Railway westwards from Manuel Junction to Nicolton Farm at Gilston. This would provide an attraction at the southern terminus of the railway and an integrated tourist experience given proximity to the canal.

Council response: The project is not included specifically in the Proposed Plan as it is considered unlikely that it would be brought forward in the period of the plan, given the costs involved, and the lack of any detailed feasibility study. Nonetheless Whitecross/Gilston is recognised as a tourism node in the spatial strategy, providing support in principle for developments which would enhance the tourism role of the location. The route is green belt and so would be protected in any case from developments which might compromise the project coming forward in the future.

BNS/B Bo'ness Potential New Sites

The site at Bo'mains Farm should not be developed for housing. This will do nothing for Bo'ness Town Centre.

Council response: The site has been included as a proposal in the Proposed Plan. It is considered to present a good opportunity for settlement expansion, rounding off the urban edge. Landscape impacts can be mitigated, and there are no overriding infrastructural constraints. Maintaining population/household levels in the town can assist the vitality and viability of the Town Centre.

GRA/A Grangemouth Committed Sites

The proposed deletion of Kinneil Kerse is queried.

Council response: The allocation of the site is no longer considered justified. It is no longer required to be safeguarded by national policy, and there is no demonstrable need for additional land for petrochemical development, bearing in mind the substantial vacant or underused land available within the existing petrochemical complex. There are potential significant impacts on the adjacent Firth of Forth SPA, and the site may also be subject to flooding issues.

00831 **King Ian**

Comments: 3

Main Issue 2: Sustainable Housing Locations

Would support the Council's preferred option for modest growth as opposed to major growth. However, proposed preferred new sites at Reddingmuirhead, and Sunnyside Road, and non-preferred sites south of Sunnyside Road (POL/B/13 and POL/B/17) are opposed. There would be visual impact when viewed from the higher levels of Wallacestone, California and the California/Maddiston road. Allocating these sites would erode urban limit and set a precedent for further development in the area in the future. Development would put enormous pressure on the capacity of roads in the area and pressure at Polmont railway station, already unable to accommodate car parking of existing users. The current growth strategy does not accord with the principles of sustainable development and opportunities for re-development of brownfield sites are missed.

Council response: No housing growth is proposed to the south of Brightons or at Reddingmuirhead. None of the specified sites have been identified as proposals in the Proposed Plan.

Main Issue 11: Design Quality and Placemaking

New housing development should make better use of existing natural features on site in order to retain the identity of an area and reduce visual impact of new development.

Council response: Comment noted. Policies in the Proposed Plan emphasise the importance of retaining and enhancing natural features in site planning, and this will be supported by Supplementary Guidance on subjects such as Biodiversity and Development, and Trees and Development.

Main Issue 5: Green Belt

The second alternative for green belt is favoured, i.e. Expansion of the green belt to the south of Falkirk and Polmont. The area south of Falkirk has high landscape value in comparison to other areas in the district and has a significant network of paths. Designation of a green belt would also manage settlement coalescence.

Council response: This extension of the green belt into this area is not considered appropriate, although countryside policies will continue to protect the area from development over the period of the plan. The primary purpose of green belt in the Proposed Plan is to separate major communities, and the land to the south of Falkirk/Polmont does not fit this criterion.

00846 **King Lorna**

Comments: 2

Main Issue 2: Sustainable Housing Locations

The development of sites at Reddingmuirhead and Sunnyside Road (POL/B/05,13&17) is not supported as it will lead to the loss of the semi rural character of Wallacestone, Brightons and Reddingmuirhead and an adverse impact on local landscape character. Otherwise, the Council's preferred option for modest housing growth in the Polmont area is supported in

Authority Response to Contributions by Contributor for FLDP_MAIN

preference to the non preferred option of major growth and development, including the south side of Sunnyside Road. In addition to the above concerns, development to the south of Sunnyside Road would put enormous pressure on existing roads and transportation infrastructure including car parking at Polmont station and compromise the defensibility of the urban limit.

Council response: The sites in question have not been identified as housing proposals in the Proposed Plan.

Main Issue 5: Green Belt

Support the establishment of a green belt to the south of Falkirk and Polmont to protect the landscape setting of Falkirk and Polmont and prevent the coalescence of Maddiston, Rumford, Reddingmuirhead and Wallacestone.

Council response: This extension of the green belt into this area is not considered appropriate, although countryside policies will continue to protect the area from development over the period of the plan. The primary purpose of green belt in the Proposed Plan is to separate major communities, and the land to the south of Falkirk/Polmont does not fit this criterion. The communities referred to are already physically joined.

00471 Klondyke Group Limited

Comments: 2

Main Issue: 7: Employment Land

Supportive of the Council's approach to employment land and the allocation of Beancross as a key node. Would support site POL/B/04 as a preferred site for economic development.

Council response: Support noted. The site at Beancross has been identified as an economic development proposal in the Proposed Plan.

Main Issue 5: Green Belt

Klondyke Group Ltd seek the preferred site (POL/B/04) at Beancross to be removed from the Green Belt. The surrounding uses and precedent set in the locale mean that the Green Belt allocation is no longer appropriate.

Council response: It is considered that green belt should be retained in this location. This remains a critical pinch point in terms of maintaining the separation of Grangemouth and Polmont.

00851 Land Options West

Comments: 2

Main Issue 1: Housing Growth

The higher rate of growth as a minimum should be adopted as well as adding an allowance for flexibility. This would promote around 900 houses per annum, which closely matches the housing requirement identified in the HNDA. Greater certainty in the Development Plan process is required. Longer term allocations for the post-2024 period should be allocated now and identified with a star, enabling developers to plan for future developments and to allow infrastructure funding to take place.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions. In terms of longer term growth, a number of the identified sites will yield output in the post 2024 period. Further sites, as required, can be brought forward through successive reviews of the LDP.

Main Issue 2: Sustainable Housing Locations

Land Options West seek the allocation of the Parkhall expansion area (POL/B/08 and POL/B/09) for a mixed use development including housing, canal/leisure uses, leisure, greenspace and community facilities.

Council response: Development of the wider Parkhall area would have major landscape impacts, impacts on the canal, as well as impacts on the various ecological sites within and adjacent to the site. Development of this scale would require major new educational infrastructure, with a new primary school and secondary school extension, as well as significant new roads infrastructure. In terms of the housing land requirement of 1050 units, an additional 1500 new dwellinghouses is not required. Polmont has a substantial level of existing commitments (around 840 units), notably Overton, Redding Park, and Parkhall where development is ongoing, and Toravon which is are yet to commence. It is considered that the Strategic Growth Area at Parkhall identified in the Proposed Plan, along with the other opportunities is sufficient.

00440 Larbert, Stenhousemuir and Torwood Community Council

Comments: 13

Main Issue 2: Sustainable Housing Locations

Community Council agree with preferred option of consolidation set out in paragraph 3.50. The infrastructure in the area would be unable to accommodate any further growth. Already some concern over supporting existing commitments. Roadways, schools, health services, water drainage services are already under pressure. There is no need to encroach further into the green belt.

Council response: The support of the Community Council to the strategy of consolidation adopted in Larbert and Stenhousemuir is noted.

Main Issue 3: Housing Need

Community Council comment that the level of 15% affordable housing would seem more than sufficient particularly given the level of housing already committed. The viability of a further 123 affordable houses must be questioned. Larbert enjoys the benefits and suffers the difficulties of being so central with a good train service to Scotland's largest cities. A balance needs to be maintained while ensuring that the infrastructure can be improved.

Council response: The Proposed Plan outlines that the Council will seek 25% affordable housing units in new housing developments of 20 units and over. This higher percentage contribution (i.e. 25% rather 15%) reflects the findings of the Housings Need and Demand Assessment, where Larbert/Stenhousemuir has the highest level of need of all sub-areas, and therefore the percentage contribution should not be reduced.

Main Issue 4: Infrastructure for Growth

Community Council note that an extension is proposed at Larbert High School, and comment that there does not appear to be sufficient ground to build such an extension beside the existing school and a remote extension would be undesirable. It is felt that there is a clear difficulty as the need for housing will cause problems for education. Further alteration of the catchment areas may be the only solution but would be vehemently opposed.

Council response: Comments noted, however a new build extension to Larbert High School is not proposed. The Proposed Plan outlines that capacity enhancements at the high school will involve the conversion of the neighbouring Carrongrange School accommodation.

Main Issue 5: Green Belt

Community Council agree that the green belt should be maintained. The alternative would not be acceptable, particularly the alternative option set out in paragraph 3.105 where the green belt around Stenhousemuir would be released.

Council response: The green belt surrounding Larbert and Stenhousemuir is maintained.

Main Issue 6: Countryside

Community Council comment that the preferred option set out in paragraph 3.110 would be the only acceptable option. In particular they agree that the sensitive redevelopment of existing steadings is a realistic approach, as is restoration of historic buildings.

Council response: Comments noted. The Housing in the Countryside Policy has been revised in the manner set out in the Preferred Option (paragraph 3.110) in the MIR, which is supported by the Community Council.

Main Issue 2: Sustainable Housing Locations

Community Council comment that the continued application for additional housing in Torwood should be discouraged. The trees around the village are of a historical nature and should continue to be preserved. The character and the nature of the village should be maintained. The creeping growth must be stopped and that should be clear in the Local Plan.

Council response: Comments noted. There is no further housing growth proposed in Torwood, with the exception of two small sites carried forward from the previous Local Plan (the former Torwood School and McLaren Park).

Main Issue 7: Employment Land

Community Council comment that the reference to the residual land at Forth Valley Royal Hospital is not clear, as there would not appear to be any residual land on that site.

Council response: Comments noted. There is now limited residual land at Forth Valley Royal Hospital (FVRH), which is likely to be used for hospital ancillary uses. There is no economic development proposal identified for the FVRH site in the Proposed Plan.

Main Issue 7 : Employment Land

Community Council do not take exception to the preferred option, however comment that any further development at Lochlands must look at the access roads which are in poor condition. Falkirk Council will need to improve access with a new road from the Bonnybridge side, as improvement at the bridges in Larbert would not seem possible. While the majority of sites identified in the Labert Gateway are acceptable, consideration should be given to removing the Forth Valley Royal Hospital site from the Larbert Gateway. Consideration might be given to replacing it with the site at Lochlands subject to road improvement.

Council response: A small site at Lochlands Industrial Estate has been identified as a proposal for economic development in the Proposed Plan. The current access to the industrial estate is considered broadly suitable in relation to the size of the site, although any detailed upgrading required would be considered through any subsequent planning application. No economic development proposals are identified for the FVRH site.

Main Issue 8: Town Centres and Retail Provision

Community Council comment that whilst Stenhousemuir is identified as a District Centre, there is concern whether the regeneration of that centre has worked. There are many empty shop units, a lack of variety in the units and the overall feeling is of a struggling centre. The introduction of Asda has helped the community to shop locally, but there is still a need to review and improve. Community Council are also concerned about the impact on Stenhousemuir by the introduction of retail units at Kinnaird. Community Council also comment on Figure 6.3. Larbert has been identified as a Local Centre, but there is no indication that there is to be any development. Suggest that consideration should be given to energising the town centre particularly if there is difficulty in improving Stenhousemuir Town Centre.

Council response: Comments noted. The proposed retail units at Kinnaird will provide a neighbourhood facility, so no impact on Stenhousemuir District Centre is anticipated. There are no proposals for Larbert Local Centre.

Main Issue 9: Strategic Access and Sustainable Travel

Community Council comment that the preferred option outlined in paragraph 4.56 is very wide and open to interpretation. They highlight issues associated with the Forth Valley Royal Hospital, commenting that much of the traffic and parking difficulties around the hospital can be attributed to the fact there is only one access road to and from the hospital. To avoid tail backs at peak times and improve access, it is suggested that a further road be built on the other side of the hospital towards Denny and Bonnybridge.

Council response: The construction of a further access road to address reported congestion around the Forth Valley Hospital is not considered necessary. Traffic management issues are a matter for the Local Transport Strategy.

Main Issue 10: A Sustainable Place

Community Council outline that there is a need for further guidance for those wishing to construct wind farms and it is hoped a spatial framework can be finalised in the near future. They comment that wind farms should be well away from settlements, or off shore.

Council response: Comments noted. The Scottish Government has set out ambitious targets for the generation of renewable energy. As required by the Scottish Government, the Council has produced The Spatial Framework for Wind Energy Development Supplementary Planning Guidance (SPG). The SPG is intended to provide guidance to developers and other key stakeholders on the key areas which require protection, those which are subject to constraint and those where wind energy can potentially be accommodated.

Main Issue 12: The Green Network

Community Council highlight that it is necessary to emphasise the green network. They support the preferred option, however suggest that penalties should be introduced for those who take the law into their hands and cut down trees that upset the balance of nature (Torwood given as an example).

Council response: Comments noted. The creation and enhancement of the Green Network is strongly supported in the Proposed Plan. However penalties for unauthorised tree felling are outwith the scope of the Local Development Plan.

L&S/B Larbert and Stenhousemuir Potential New Sites

Community Council note that the Pretoria Road/Denny Road site (L&S/B/04) is identified as a non-preferred site. It is therefore considered that it should be released for the creation of allotments, which is already under consideration by the Forestry Commission and NHS Steering Group.

Council response: Comments noted. The Pretoria Road/Denny Road site is included within the urban limit within the Proposed Plan. The plan does not preclude the development of this site for allotments should a proposal be forthcoming.

00745 Latent Land Scotland

Comments: 2

Main Issue 1: Housing Growth

The LDP should adopt the High Growth option. Whilst there is an adequate amount of land carried over and / or allocated to meet the strategic housing land requirement in the Falkirk LDP area, not all of that land is effective or deliverable in the Plan period to 2024. Sites which have been allocated in previous plans but which were not developed even at the height of the housing boom should not be assumed to be effective and should be removed from the effective housing land supply calculations. It is imperative that land is allocated to provide a range and choice of sites.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SIRR at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing Locations

The preferred growth option in Falkirk should be major growth to the south of the town. Glen Works and other significant brownfield sites are available and capable of delivering housing units in the Plan period to 2024. Any constraints are capable of being mitigated, and the benefits of the re-use of brownfield land in sustainable locations should be acknowledged. Further greenfield land should not be released at Mungal Farm, since there is a sufficient existing undeveloped allocation at that location.

Council response: The spatial strategy for housing growth in Falkirk remains focused on a series of regeneration opportunities along the Forth and Clyde Canal and greenfield expansion at Mungal/Cauldhome, with the addition of an opportunity at Forth Valley College. This is considered the most appropriate and sustainable option rather than growth to the south. Sites to the south, particularly at Glen Farm and Glen Works, are detached from the urban area, less accessible and will have substantial landscape impact.

00804 Lawson Paul and Lynne

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00828 Leadbetter J

Comments: 1

RUR/B Rural Area Potential New Sites

Support for some new housing at Blackbraes, California (RUR/B/02) to regenerate the village and provide additional housing opportunities.

Council response: No allocation has been made at Blackbraes in the Proposed Plan. The site is located in the countryside outside the boundary of existing settlements and its development would be considered to be unsustainable due to the distance from existing services. The site furthermore does not correspond with the footprint of the former community at Blackbraes. Allocated sites in the wider Rural South area are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

00119 **Leckie Philip**

Comments: 3

RUR/B Rural Area Potential New Sites

The site at Hillhead Farm, Slamannan (RUR/B/06) should be allocated as part of the housing land supply contributing to the regeneration of Slamannan. The sites presently being promoted in Slamannan and Limerigg would compound the existing flooding and drainage problems in the area and the sites at Hillhead Farm and Wester Jaw (RUR/B/05) do not have the same constraints as the site allocations to the south of the village. (Reference is also made to potential in the area for a waste to energy facility in or around the Hillhead/Wester Jaw area).

Council response: The site has not been identified as a proposal in the Proposed Plan. It is physically detached and isolated from Slamannan and does not represent a logical extension to the village. There would be significant landscape impacts given the topography of the site. Whilst the Council is still promoting a strategy of housing-led regeneration in Slamannan, the overall scale of housing in the village has been scaled back to what are considered more realistic levels, in the light of development constraints and market conditions. The site being promoted in the Proposed Plan at Hillend Farm has the potential to address some of the flooding problems affecting parts of the village.

RUR/B Rural Area Potential New Sites

The site at Wester Jaw, Slamannan (RUR/B/05) should be allocated as part of the housing land supply contributing to the regeneration of Slamannan. The sites presently being promoted in Slamannan and Limerigg would compound the existing flooding and drainage problems in the area and the sites at Hillhead Farm (RUR/B/06) and Wester Jaw, do not have the same constraints as the site allocations to the south of the village. (Reference is also made to potential in the area for a waste to energy facility in or around the Hillhead/Wester Jaw area).

Council response: The site has not been identified as a proposal in the Proposed Plan. It is physically detached and isolated from Slamannan and does not represent a logical extension to the village. There would be significant landscape impacts and potential adverse impacts on the Slamannan Plateau SPA. Whilst the Council is still promoting a strategy of housing-led regeneration in Slamannan, the overall scale of housing in the village has been scaled back to what are considered more realistic levels, in the light of development constraints and market conditions. The site being promoted in the Proposed Plan at Hillend Farm has the potential to address some of the flooding problems affecting parts of the village.

STA/B Standburn Potential New Sites

The site at Standburn East (STA/B/02) should be allocated. It bounds the village and could complement future site releases in close proximity, by providing funding for improvements to the A801. There are no obvious areas for infill or rounding off in Standburn and the current allocation may prove difficult to develop. An allocation would contribute to the need for additional sites and would increase economic prosperity in the area.

Council response: The site has not been identified as a mixed use proposal in the Proposed Plan. Its scale is considered excessive in relation to the existing village, and it does not integrate well with the existing form of the village. There would be significant impacts on the landscape and the the setting of the village. The Strategic Growth area at Whitecross is located in relative proximity, as is the strategic employment site at Gilston. Reference to potential contributions to the upgrade of the A801 Corridor (Avon Gorge) are noted. The housing allocation at Standburn is considered to offer sufficient flexibility to accommodate future housing requirements in the village.

01001 **Leigh Jean**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00242 **Leishman Margaret**

Comments: 2

Main Issue 5: Green Belt

There should be no green belt release for development in Bo'ness.

Council response: The proposed green belt release is considered to be justified given its limited scale and impact on the overall function of the green belt in the vicinity.

BNS/B Bo'ness Potential New Sites

Green belt land should not be released for housing at Bo'mains Farm. It is part of an AGLV, is of nature conservation and recreational value. Drainage is a concern on Crawfield Road and would be exacerbated by new housing. Traffic, pollution and noise would increase. There is a lot of land still to be developed at the Drum and the foreshore, with major housing proposed at Linlithgow and brownfield sites such as the Russell Athletic site should be used in preference. Health services will be further stretched.

Council response: The site has been included as a proposal in the Proposed Plan. Notwithstanding the loss of green belt, it is considered to present a good opportunity for settlement expansion, rounding off the urban edge. Landscape impacts can be mitigated, and there are no overriding infrastructural constraints. The Bo'ness Foreshore site is no longer likely to come forward within the initial 10 year plan period, prompting the need to bring forward alternative sites.

01023 **Lenihan Chris M**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00994 **Lim Violet**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00867 **Little Kerse Leisure Ltd.**

Comments: 1

GRA/B Grangemouth Potential New Sites

This objection relates to main issues Green Belt and Employment Land (Tourism). Planet Soccer is currently operating from the Little Kerse site with 5 all weather pitches. Little Kerse Leisure has a 99 yr lease with Ineos for the site and a phased expansion of the business is proposed over the next 5 years. The vision for the LDP is welcomed and the LDP should be sensitive to the needs of growing businesses. The vision of a network of thriving communities is supported however it is not considered that there are no expansion options for Grangemouth. The Green Belt in this area has little or no value and is constraining the sustainable growth of tourism and leisure facilities. More selective releases of land rather than deallocation at Skinflats would deliver more returns. A release in this area would bring economic and tourism benefits and it should be recognised that enabling development may also be required. The MIR is skewed towards environmental considerations rather than economic ones and this could constrain tourism growth. Grangemouth is part of a strategic investment zone and activities at Little Kerse should be seen as complementary to the competitiveness of the wider area and an opportunity for diversification. The tourism section presents a series of inter connected networks and nodes and it is considered that Little Kerse should be referred to in this section with a recognition that other opportunities for such nodes are emerging such as in the alternative option in para. 4.28. The inclusion of Little Kerse should be considered along with the non preferred allocation at Inchyra. The reference to Kinneil Kerse as a key node requires clarification as there is no detail of any proposals. The site at Little Kerse has good transport links and has good defensible boundaries. It does not meet green belt tests of preventing urban coalescence, affecting the landscape character and setting of a town nor is it of value for recreational or outdoor uses.

Council response: The Proposed Plan has taken a balanced approach to the green belt, informed by a full review of green belt purpose and definition. Areas have been released for development where appropriate. The site at Little Kerse remains a logical and legitimate part of the green belt, contributing to the separation of Grangemouth and Polmont. The Proposed Plan has acknowledged that there is potential for expansion of recreational facilities at Little Kerse, which could be compatible with green belt objectives.

00992 **London John**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01037 **M+M Consultancy**

Comments: 1

RUR/B Rural Area Potential New Sites

The site at Wester Jaw, Slamannan (RUR/B/05) should be allocated for residential development in the Proposed Plan in addition to the sites already allocated in Slamannan to ensure that there is sufficient deliverable development land made available to address the existing major infrastructure issues in the town and to ensure that the level of planning obligations do not adversely affect the viability of development. There has been no significant development in the village in recent years and it is considered that a far more ambitious vision for the village should be adopted to generate market demand.

Council response: The site has not been identified as a proposal in the Proposed Plan. It is physically detached and isolated from Slamannan and does not represent a logical extension to the village. There would be significant landscape impacts and potential adverse impacts on the Slamannan Plateau SPA. Whilst the Council is still promoting a strategy of housing-led regeneration in Slamannan, the overall scale of housing in the village has been scaled back to what are considered more realistic levels, in the light of development constraints and market conditions.

01013 **Mackay Lorna J**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00011 **Mactaggart and Mickel Ltd**

Comments: 12

Main Issue 1: Housing Growth

Mactaggart and Mickel agree with the Council's preferred strategy of medium growth (725 units per annum) which is a suitable and balanced approach in the current economic climate and assuming there are a number of established sites yet to start on site.

Council response: Support welcomed. The housing growth target has been reduced slightly in the light of revised household projections.

Main Issue 2: Sustainable Housing Locations

Mactaggart and Mickel consider the 350 unit requirement for period 2014-24 adequate for Denny's housing needs, although they consider this should not preclude smaller localised sites coming forward to provide housing choice.

Council response: The Proposed Plan provides for a mix of large and small sites to meet the Denny settlement additional housing requirement of 408 homes by 2024, increased from the 350 in the MIR. The development of suitable windfall sites on land within the urban limit under policy HSG03 can provide further housing choice. Section 5 of Technical Report 3 provides the rationale for the level of growth considered suitable and the choice of sites in each of the 9 settlement areas.

Authority Response to Contributions by Contributor for FLDP_MAINVision

Mactaggart and Mickel support the preferred vision for Falkirk Council area, based on delivering growth through economic prosperity and quality of life in all communities.

Council response: Support welcomed.

Main Issue 1: Housing Growth

Mactaggart and Mickel support the level of growth in the preferred option of 725 units per annum as it is considered realistic and attainable.

Council response: Support welcomed. The housing growth target has been reduced slightly in the light of revised household projections.

Main Issue 2: Sustainable Housing Locations

Mactaggart and Mickel agree that the scale of housing growth proposed for each settlement is acceptable.

Council response: Support noted

BNS/B Bo'ness Potential New Sites

The site at Carriden, Bo'ness (BNS/B/04) is capable of providing an effective housing opportunity and should be identified as a preferred site. An assessment of opportunities and constraints associated with the site is provided. Together with a conceptual development framework. The reduction of the site capacity to 20 units will allow existing landscape features and woodland to be retained.

Council response: The site has not be identified as a housing proposal in the Proposed Plan. The site does not relate well to the existing settlement. There would be potential adverse impacts on the green network and the setting of Carriden Church, and potential noise/odour issues associated with the adjacent industrial area.

BNS/C Bo'ness Amended Use Sites

The promotion of mixed use development at Drum Farm South site in Bo'ness is supported. Although Council commitment to the Bo'ness foreshore development is lauded, this development is constrained and mixed use at Drum Farm South will help maintain an effective 5 year housing land supply. The identification of the site within the Eastern Gateway employment zone is also supported, and the business park will remain an integral component of the overall Drum project. An outline Development Framework showing residential and business uses, open space and local facilities is provided.

Council response: Support noted.

DEN/B Denny Potential New Sites

Mactaggart and Mickel support the extension of Carrongrove Mill (site DEN/B/01) which is a natural and logical last phase of development and will assist with the economic viability of this derelict mill complex. Whilst there is an element of commercial development proposed they consider that, as the main site now has residential consent, both sites should be zoned for housing.

Council response: Proposed Plan proposal H17 provides for an enlarged Carrongrove Mill site with a housing allocation.

DEN/B Denny Potential New Sites

Mactaggart and Mickel do not support the non-preferred status of Rosebank, Dunipace site (DEN/B/05) and wish it to be changed to a preferred option. M&M note that the site assessment suggests the site could come forward in the long term but they believe the constraints can be overcome to allow it to be included in the 2014-24 phase of the plan.

Council response: The site at Rosebank, Dunipace (DEN/B/05) has been identified as a housing proposal in the Proposed Plan. This site forms an initial phase of a potential major expansion north of Dunipace. There are landscape sensitivities associated with the more elevated eastern parts of the site and development would need to be carefully controlled through a masterplan, with suitable landscape structure and mitigation. The site has medium levels of accessibility to local services and community infrastructure but its development may require expanded capacity at Dunipace Primary School in the medium to long term.

FAL/B Falkirk Potential New Sites

A site at Standalane, Falkirk should be allocated for residential development. There is concern that some of the proposed allocations have limited prospects of delivering housing in the LDP period and cannot be considered to be effective. The Standalane site is effective. It would knit well into the existing urban fabric and create a more robust settlement edge. In relation to the Battle of Falkirk site, battlefields are not offered statutory protection and there would be little impact on overall battlefield authenticity, so there is no justification for a presumption against development. Ecological and landscape studies have been carried out, and a masterplanned approach is advocated. The site can integrate with local amenities through existing and new paths.

Council response: The site has not been identified as a proposal for housing in the Proposed Plan. Whilst it could be viewed as a rounding off of the settlement boundary, it would have an adverse impact on the site of the Battle of Falkirk and there are significant capacity constraints in the catchment primary school.

MUR/B Muirhouses Potential New Sites

The identification of East Muirhouses 1 (MUR/B/02) as a preferred site is supported. However, East Muirhouses 2 (MUR/B/03) and Carriden Walled Garden (MUR/B/01) are capable of providing further phases of development. An assessment of opportunities and constraints is provided for the combined 3 sites, together with a conceptual development framework.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. Further assessment suggests that there will be substantial impacts on trees and hedgerows which would have an adverse impact on the setting of the village and Carriden Estate. Public consultation has raised concerns about traffic issues on Carriden Brae.

POL/B Polmont Potential New Sites

The identification of Middlerigg, Reddingmuirhead (POL/B/05) as a preferred site is supported. The site can be considered effective in planning terms. An assessment of opportunities and constraints associated with the site is provided, together with a conceptual development framework.

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00323 Maddiston Community Council

Comments: 1

Main Issue 4: Infrastructure for Growth

Maddiston has a poor image in the Falkirk District due to the absence of any infrastructure investment in the village, aside from the new school which is already full. There is little evidence that planning gain money has been invested in the Maddiston area and we would ask that future planning gain money be invested locally. Maddiston requires a community centre to cope with the increasing number of residents in the village and their diverse requirements. Maddiston is included within the wider Polmont area for planning purposes and it is considered that it is misleading in terms of identifying access to facilities, open spaces etc. Maddiston is on the Scottish Multiple Index of Deprivation (SMID) and requires to be considered separately as the poorest residents of Maddiston cannot access services in the wider Polmont area. The new school is already at capacity and it is considered that there is little scope for additional expansion of the village. There needs to be more discussion and consultation within the community about positive developments that potentially come forward.

Council response: Any requirements to upgrade infrastructure in the Maddiston area are set out in Proposed Plan proposals. The Community Council will have a full opportunity to be involved in the consultation on the Proposed Plan.

00801 Mann Clifford

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of the village. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure (particularly roads and education) will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00455 Manor Forrest Ltd

Comments: 6

Main Issue 5: Green Belt

The LDP should go further to recognise areas of green belt which no longer serve a planning function. Specifically this can be seen in Polmont/Beancross where a node has emerged with restaurants, hotels, garden centre and a distillery. The LDP should reassess the green belt in vibrant communities such as Polmont in order to achieve growth in a sustainable manner as the function of the green belt is to direct planned growth to the most appropriate locations and support regeneration.

Council response: A review of the green belt has taken place, including the situation at Beancross, which is recognised as a pinch point. Indeed, the release of this area was considered as an option within Technical Report 6. However, notwithstanding the various developments in the green belt in this location, the area still contributes to the separation of Grangemouth and Polmont, which is its principal function here. Accordingly, the green belt has been retained in the Proposed Plan.

B&B/B Bonnybridge and Banknock Potential New Sites

Milnquarter Farm (B&B/B/07) should be identified as a preferred site. The significant infrastructure requirements of the Dennyloanhead sites and the Banknock SIRR mean that these sites would be unachievable in the short-medium term. Sites such as Milnquarter Farm would provide sustainable medium-term growth. The inclusion of B&B/B/07 would see the redevelopment of a previous brownfield site in a layout sympathetic to the cultural heritage with phasing and developer contributions addressed.

Council response: Comment noted. However, due to the uncertainty over whether the school capacity constraint at Antonine Primary School could be overcome to accommodate the projected increase in school rolls caused by the development of this site; or whether the site can be designed to avoid an adverse impact on the setting of scheduled parts of the WHS, the site has not been identified as an opportunity for housing growth in the Proposed Plan.

LIM/B Limerigg Potential New Sites

The allocation of LIM/B/01 will enhance the allocated site LIM/A/04 by providing the opportunity of a mixed-use site and a mixture of housing type and tenure. It is considered that this site would be effective and would be preferable to the Slammanan and Whitecross SIRRs which are not considered effective for the foreseeable future due to infrastructure costs and the reliance on third party land.

The housing capacity of 190 in the LDP fails to reflect the possibility of neighbourhood stores and community facilities and is significantly higher than would be anticipated on this site.

Council response: There is already a very generous supply of land in Limerigg and nearby Slamannan in relation to the size of these villages and market demand. Additional significant development in Limerigg is likely to lead to severe capacity constraints at the local primary school.

The new settlement at Whitecross is progressing through the planning process, and is carried through into the Proposed Plan as a Strategic Growth Area. As a result of there being no active developer, the scale of growth at Slamannan has been considerably reduced.

POL/B Polmont Potential New Sites

A site at Polmont Park should be allocated for development. This would achieve the twin goals of promoting growth without jeopardising the role of the Green Belt in protecting the identity of Polmont.

Council response: It is not considered appropriate to include this site within the Proposed Plan. The site is located within the Antonine Wall World Heritage Site Buffer Zone and would result in erosion of the Green Belt between Polmont and Grangemouth.

POL/B Polmont Potential New Sites

Sites POL/B/08 and POL/B/09 should be identified as preferred options in order to provide an effective supply of housing land. A number of existing sites are unviable due to high-start up costs, acquisition at high value, and major infrastructure requirements. Allocation of the sites would contribute to the further housing-led regeneration of Maddiston. There is initial capacity at local primary/secondary schools and future education capacity issues can be addressed through planning gain. The development will allow the extension of the distributor road from its current end point to the A801 and a direct link to the M9 at J4. This will provide relief to the major volumes of traffic using the local road network.

Council response: Development of the wider Parkhall area would have major landscape impacts, impacts on the canal, as well as impacts on the various ecological sites within and adjacent to the site. Development of this scale would require major new educational infrastructure, with a new primary school and secondary school extension, as well as significant new roads infrastructure. In terms of the housing land requirement of 1050 units for the Polmont area, an additional 1500 new dwellinghouses is not required. Polmont has a substantial level of existing commitments (around 840 units), notably Overton, Redding Park, and Parkhall where development is ongoing, and Toravon which is yet to commence. It is considered that the Strategic Growth Area at Parkhall identified in the Proposed Plan, along with the other opportunities is sufficient to meet the housing land requirement.

POL/B Polmont Potential New Sites

Parkhall Farm East 1 (POL/B/06) should not be identified as a preferred option as it is considered to be non-effective in terms of access, flooding and drainage, and the requirement for third party ground.

Council response: The Strategic Growth Area guidance relating to Maddiston East sets out the requirements in order forward development, including a co-ordinated access strategy and the requirement for a flood risk assessment. It is considered that the identification of Maddiston East as a Strategic Growth Area will ensure co-ordinated delivery of infrastructure requirements.

01018 **Marshall Lynn & Steve**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00475 **Marshalls plc**

Comments: 1

FAL/B Falkirk Potential New Sites

The comment with regard to possible redevelopment of the Marshalls site in Falkirk should be more positive, along the lines of the existing policy designation. The site continues to operate successfully and is an integral part of the Marshalls business plan. However, given the uncertainty of the current economic climate it is not possible to make predictions for the medium to long-term. The new plan, once adopted, will run for 10 years and therefore it is only prudent to include a positive reference to the possibility of redevelopment for alternative use.

Council response: The site is included within a business/industrial area with potential for redevelopment in the Proposed Plan, so there is no change in approach from the current Local Plan.

00854 **Martindale Simon**

Comments: 1

L&S/A Larbert and Stenhousemuir Committed Sites

Submission on behalf of Mayfield Capital Investment Management relating to Central Business Park, Larbert. They have a specific interest in Unit 6 Central Boulevard within Central Business Park (a property currently leased to Falkirk Council

which has been unoccupied since November 2007).

They are seeking a relaxation in planning policy at Central Business Park Larbert to allow for storage and distribution uses without the need to apply for planning permission. It is also requested that further consideration to be given to mixed retail / employment uses in the Business Park.

Council response: Comments noted. It is not accepted that there should be an automatic presumption to allow storage and distribution uses without the need to apply for planning consent. Storage and Distribution is a separate use, as defined in the the Town and Country Planning (Use Classes) (Scotland) Order 1997. A change in use to Storage and Distribution is considered a different type of development, and therefore needs to be properly assessed through the planning process.

Central Business Park is safeguarded for business and industrial uses and it is not considered an appropriate location for retail development. The Falkirk area has a well-established system of town, district and local centres and development which would significantly undermine the role of any centre in the network, will not be permitted.

00811 **May Kenneth**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will have a harmful effect on the environment. Sites POL/B/02,03,13,15 & 17 are not supported. Local infrastructure will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

01059 **McAuslan Elizabeth**

Comments: 1

SHIE/B Shieldhill Potential New Sites

Support for housing site at Hillcrest (SHIE/B/02)

Council response: Support noted. The site is identified as a housing proposal in the Proposed Plan.

00883 **McCarroll T**

Comments: 1

POL/B Polmont Potential New Sites

The non-preferred site at Station Road, Polmont (POL/B/11) should be allocated for residential development. The site now has an access and could deliver traffic calming in the existing village centre. The site could be adequately screened which would mitigate landscape impact. The site is considered deliverable and effective. Sites such as Sunnyside Road, Rumford (POL/B/15) and Whitecross SIRR are not considered to be deliverable in the near future.

Council response: It was not considered appropriate to identify the site in either the MIR or the Proposed Plan. The site forms an important part of the Green Network (Proposed GN01) in visual and public access terms, and would be highlight visible from the railway and the canal. There are access issues in terms of securing a satisfactory access to the site and there are capacity issues in both of the relevant catchment schools.

Following on from consultation with the local community, as well as site effectiveness issues, Sunnyside Road has not been carried forward to the Proposed Plan. The existing Whitecross SIRR allocation has been carried over from the Falkirk Council Local Plan into the Proposed Plan and is considered deliverable within the medium/long term.

00985 **McClurg Raymond**

Comments: 5

Main Issue 1: Housing Growth

It is considered that the Council's medium growth option is insufficient. The HNDA outlines the need for an additional 9350 units in the period 2014-2024 (935 units/year). Despite this, Falkirk Council's preferred option is only to plan for 725 units/year or 7250 units over the 10 year period, some 22% below the HNDA requirements. There is no assessment within the MIR or supporting documents of effectiveness of new sites. Housing allocations within the adopted FCLP are carried forward within the LDP with no assessment of their effectiveness set out. A full assessment of all residential sites proposed within the local development plan should be carried out and non-effective sites should be deleted. It is unlikely that the four SIRRs, which are now part of the supply, will be able to deliver within the LDP period. Adopting an approach of relying on existing allocated sites to deliver development (whether or not their effectiveness has been demonstrated) will reduce the assumed level of new allocations to be made through the local development plan process, potentially exacerbating supply issues. A generous effective land supply will allow more productive progress towards meeting identified needs, far more so that relying on historic allocations which are out of step with market realities (such as the identified SIRR at Slamannan and Bo'ness).

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SIRRs at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing Locations

If the Slamannan SIRR is to be an integral part of the commitments taken forward, the the Council should demonstrate its

Authority Response to Contributions by Contributor for FLDP_MAIN

effectiveness. To add additional allocations will compound the delivery failure. There are similar concerns with Limerigg and Avonbridge. The 3 settlements outlined, Slamannan, Avonbridge and Limerigg account for some 1211 units or 62% of the Rural South land supply. Effective sites should be allocated elsewhere in the sub-area to ensure delivery.

Council response: The existing housing land supply has been reviewed to assess its effectiveness. The phasing of sites has been adjusted according and some sites have been removed. In the Rural South area, the Slamannan sites have been reduced in scale and the main Hillend Farm site is no longer regarded as effective in the initial 10 year period of the plan.

Main Issue 2: Sustainable Housing Locations

The approach set out within the preferred option for sustainable housing locations in Bonnybridge and Banknock is supported subject to the effectiveness of land allocations being demonstrated. The SIRR development, whilst considered to have merit and likely to be substantially deliverable within the Local Development Plan period, should be removed from the housing land supply calculations.

Council response: Comment noted. The housing delivered by the Banknock SIRR sites (H07 and M03) will not be removed from the housing land supply. In the latest edition of the Housing Land Audit (2011-2012) these two sites are projected to deliver 650 units up to 2024.

ALL/B Allandale Potential New Sites

A mixed use development comprising approximately 100 houses, a new sports pitch for Stein's Thistle and other business uses is proposed at the Stein's brickworks site (ALL/B/01) in Allandale. It is suggested that the regeneration of this sustainably located large scale brownfield site for housing and other uses should be given priority above alternative greenfield locations in line with national planning policy and current development plan policy. The site is considered to be effective with workable solutions available to address the Council's previous concerns about site access and lack of available capacity at Antonine Primary School. The proposed development would also deliver houses to meet local and wider needs, significantly add to recreational facilities/amenities, provide employment and social care facilities, improve road safety on the B816 and have a positive impact on the character of Allandale.

Council response: Following the Council's 'minded to grant' decision on the planning application, the site has been identified as a mixed use proposal in the Proposed Plan.

B&B/B Bonnybridge and Banknock Potential New Sites

The proposed allocation of the Coneypark Farm 1 site (B&B/B/01) is supported as it appears to be a logical extension to the committed Bankier Distillery site (B&B/A/05) to the east and provides additional choice/flexibility in delivery of new housing in the local area.

Council response: Comments noted. The A803 sliproad junctions with the M80 at Banknock and Haggs which are planned to be upgraded to accommodate committed growth along the A803 corridor between Coneypark and Dennyloanhead are not planned to be upgraded with enough spare capacity to accommodate additional development beyond that already committed to as part of the Falkirk Council Local Plan. Planning a further upgrading of capacity of this sliproad junction so soon after the currently planned upgrade is not considered to be appropriate due to the disruption this would cause, so significant additional housing development along the A803 over and above that already committed is not considered to be appropriate for development in the 2014-2024 period but could become a viable long term growth option.

00962 **McCulloch Peter**

Comments: 1

SHIE/B Shieldhill Potential New Sites

In relation to the sites in Shieldhill (SHIE/B/01-04), there is concern about impact of development on wildlife and the natural environment and loss of paths for walkers. Concern also about coalescence of Shieldhill and Reddingmuirhead, and traffic increase leading to more pollution, more hazardous conditions for motorists and pedestrians on the existing road network and parking difficulties at railway stations. Will also be impact on existing facilities and amenities.

Council response: Of the four sites mentioned, only the one at Hillcrest is identified as a housing proposal in the Proposed Plan. It is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

00820 **McGhee Mary**

Comments: 2

Main Issue 5: Green Belt

Concerns about any potential development on the coastal strip east of Skinflats and the threat of tidal flooding, and potential effect on ornithology/wildlife.

Council response: The Proposed Plan does not propose any built development in this area. The removal of the green belt in the location is merely to reflect that this area does contribute to the principal purposes of the green belt, i. E. Avoiding coalescence of communities and protecting the landscape setting of communities. The area remains in the countryside and will be subject to countryside protection policies. The location of this area within the floodplain of the Forth is also likely to preclude development.

POL/B Polmont Potential New Sites

Objects to allocation of Middlerigg (POL/B/05) as a preferred site. The site has significant drainage issues. Braeside Place has been subject to flash floods associated with Polmont Burn. Residents in Comyn Drive are subject to an order not permitting them to allow any water from gardens to drain in to the pavement. PATH to the rear of Crawford Drive properties is a quagmire.

Council response: The site has not been included as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01016 **McGovern J**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00996 **McInally May**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00871 **McLaren David**

Comments: 5

Vision

The Council's preferred vision is supported.

Council response: Support welcomed.

Main Issue 1: Housing Growth

Medium housing growth is the most realistic option.

Council response: Comment noted. The housing growth target has been reduced slightly in the light of updated household projections.

Main Issue 4: Infrastructure for Growth

Consideration must be given to allocating land for large public parks adjacent to large areas of development, such as Larbert and Maddiston. There is no public park like Grangemouth's Zetland park with playing fields and open grass for recreation in any of these areas. Small playgrounds in housing developments are welcome, but are no substitute. The Council should be encouraging this sort of recreation parkland in addition to the excellent woodland and countryside areas we have. There should be no further sale of school playgrounds like the Moray School in Grangemouth, and at St Margaret's in Polmont some years ago. All schools should have sports grounds. Currently, Wallacestone Primary has no useful land for sport. The car park next door should be made into a sports ground and the car park moved to the top side of the school. Public open spaces in existing housing areas should not be considered as brownfield land and developed.

Council response: Proposed plan policy INF04 requires all new development to provide open space proportionate to its scale and taking account of the requirements of the Council's Open Space Strategy. Policy INF03 protects open space from inappropriate development. The Council is preparing a Sports Pitch Strategy complementary to the LDP process.

Main Issue 5: Green Belt

A strategic expansion of the green belt to the south of Falkirk and Polmont is supported.

Council response: This extension of the green belt into this area is not considered appropriate, although countryside policies will continue to protect the area from development over the period of the plan. The primary purpose of green belt in the Proposed Plan is to separate major communities, and the land to the south of Falkirk/Polmont does not fit this criterion.

POL/B Polmont Potential New Sites

Development of the Middlerigg site (POL/B/05) for housing is not supported as local infrastructure (particularly road, education and healthcare) does not have the capacity to accommodate this development and the site is at risk of flooding.

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00876 **McLean**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons. Development of sites POL/B/13,15 & 17 is not supported. Local infrastructure (particularly transportation, healthcare and education) will not be able to cope with the scale of development envisaged on all of these sites which will lead to increased pressure on local emergency services, increased pollution and increased dog fouling.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00825 **McLellan Gavin**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will cause considerable disruption to access during the development phase. Sites POL/B/02,03,13,15 & 17 are not supported. Local infrastructure (particularly transportation and education) will not be able to cope with the scale of development envisaged on all of these sites to the detriment of road safety and overall quality of education.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00870 **McLeod Steven**

Comments: 1

L&S/B Larbert and Stenhousemuir Potential New Sites

The allocation of a site at North Broomage is sought for a care home, assisted living development, affordable or private housing. The site is considered to be an effective development site from a physical and economic / market perspective.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. This is in recognition of the fact there is no need or justification for allocating a greenfield site over and above existing housing commitments. It would be premature to designate the site without a detailed transport impact assessment, given the sites close proximity to the M876 slips and the Forth Valley Royal Hospital. The site's suitability for housing development is also questioned, as it is backland in character and poorly integrated with Larbert and Stenhousemuir, and its shopping, recreational and other community facilities. The site is also bounded on two sides by the M876 and the M876 slip road, thereby raising potential noise issues.

00935 **McNally J**

Comments: 12

Main Issue 2: Sustainable Housing Locations

The combined scale of housing growth proposed for allocation along the A803 corridor between Coneypark and Dennyloanhead will place further pressure on already overstretched community infrastructure such as schools and GP surgeries. In addition the A803 itself is projected to be at or above capacity in peak times leading to additional congestion and that any additional development will only add to problems as there are not necessarily any engineering solutions which can be found to alleviate this congestion due to the physical constraints of the area. Under current proposals the Scottish Government's vision of towns and villages where people are empowered to make their lives better will not be achieved as excessive additional housing development will break the already fragile social network that exists in the area. Delivery of a network of supporting infrastructure is key to any new housing growth and not enough detail is given within the MIR as to what form this will take or how this will be provided to accommodate the scale of proposed growth in this area.

Council response: Comment noted. The sites at Coneypark Farm 1, Mayfield Drive, Glasgow Road 1 and Glasgow Road 2 have not been identified as opportunities for housing growth in the Proposed Plan. Only one additional opportunity for housing growth along the A803 corridor between Coneypark and Dennyloanhead has been identified in the Proposed Plan meaning that the scale of housing delivered from new proposals along the corridor has been scaled back from 250 houses at the MIR stage to 20 houses.

B&B/A Bonnybridge and Banknock Committed Sites

A planning application for housing development on the Mayfield Drive site (B&B/A/01) was refused by Falkirk Council's Planning committee. An appeal against this decision was subsequently dismissed by the DPEA. In light of these decisions it is questioned why this site is still deemed to be a suitable site for housing.

Council response: Comment noted. This site is not included as an opportunity for housing growth in the Proposed Plan.

B&B/A Bonnybridge and Banknock Committed Sites

Development of the Kilsyth Road 1 site (B&B/A/03) is not supported as it involves the loss of greenspace which is a scarce resource along the A803 corridor between Coneypark and Dennyloanhead.

Council response: Comment noted, however this site has planning permission and is currently under construction.

B&B/A Bonnybridge and Banknock Committed Sites

Development of the Kilsyth Road 2 site (B&B/A/04) is not supported as it involves the loss of greenspace which is a scarce resource along the A803 corridor between Coneypark and Dennyloanhead.

Council response: Comment noted, however, this site has been included as an opportunity for housing growth (H10) in the Proposed Plan. By adopting the Falkirk Council Local Plan (within which this was an allocated site) the Council has previously considered the loss of the green area between Hags and Longcroft acceptable in order to provide opportunities for housing growth, and therefore the deletion of this site is not considered to be reasonable.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Garngrew Road site (B&B/B/03) would need to be preceded by an upgrade of the narrow Garngrew Road. A traffic management plan would also be required as the Old Cumbernauld Road is often used as a rat run when the A803 is backed up.

Council response: Comment noted.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Glasgow Road 1 site (B&B/B/04) is of concern due to its proximity to the existing bonded warehouse complex at Dennyloanhead. It is suggested that this potential site is within the exclusion zone which should be maintained around any major hazard. Development of this site would also involve the loss of greenspace which is a scarce resource along the A803 corridor between Coneypark and Dennyloanhead.

Council response: Comment noted. The site at Glasgow Road 1 (B&B/B/04) has not been included in the Proposed Plan as an opportunity for housing growth. The site is not however impinged upon by the major hazard consultation zones of the adjacent bonded warehouse complex. These consultation zones are shown on Proposal Map 1.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Coneypark Farm 1 site (B&B/B/01) would represent overdevelopment of this area. Accessing the A803 in a safe manner from this development would be problematic due to physical constraints. The A803 does not have the capacity to accommodate additional housing in this area.

Council response: Comment noted. This site is not included as an opportunity for housing growth in the Proposed Plan.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Coneypark Farm 2 site (B&B/B/02) would represent overdevelopment of this area. Accessing the A803 in a safe manner from this development would be problematic due to physical constraints. The A803 does not have the capacity to accommodate additional housing in this area.

Council response: Comment noted. This site is not included as an opportunity for housing growth in the Proposed Plan.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Kilsyth Road 4 site (B&B/B/06) would represent an overdevelopment of the area which the social infrastructure of the area does not have the capacity to accommodate. Development would totally change the character of the area from a small village to a town.

Council response: Comment noted. This site was not identified as a preferred new site for housing growth in the Main Issues Report and is not included as an opportunity for housing growth in the Proposed Plan.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Glasgow Road 2 site (B&B/B/05) would involve the loss of greenspace which is a scarce resource along the A803 corridor between Coneypark and Dennyloanhead.

Council response: Comment noted. This site is not included as an opportunity for housing growth in the Proposed Plan.

DEN/A Denny Committed Sites

Whilst the development of the Mydub 1 site (DEN/A/08) is welcomed, the Denny Eastern Access Road should be completed before any development on this site takes place in order to remove congestion from an already overburdened traffic system at Denny Cross.

Council response: The Council will consider the results of its consultation on a draft SPG which sets out an approach to the delivery of DEAR dependent largely on developer contributions.

DEN/B Denny Potential New Sites

Whilst the development of the Mydub 2 site (DEN/B/03) is welcomed, the Denny Eastern Access Road should be completed before any development on this site takes place in order to remove congestion from an already overburdened traffic system at Denny Cross.

Council response: The Council will consider the results of its consultation on a draft SPG which sets out an approach to the delivery of DEAR dependent largely on developer contributions.

00877 **McPherson**

Comments: 5

Main Issue 2: Sustainable Housing Locations

The non preferred status of sites POL/B/02,03,13 & 17 is supported as development on this scale would significantly change the character of the area, and would place unsustainable pressure on the schools, healthcare, road, transport and recreation services. At present the local schools are unable to cope with any significant increase in roll, and as such further housing development must be preceded by assessment and provision of appropriate facilities and staff. It is clear that this has not been considered previously as demonstrated by the new Maddiston School already being considered for an extension after less than 5 years in use. This is a serious issue that needs to be addressed prior to housing development.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

`Authority Response to Contributions by Contributor for FLDP_MAINMain Issue 5: Green Belt

It is notable that there is little provision for 'green belt' land to the south of Falkirk, whereas the north has a significant provision to protect the character of the area. The designation of a new green belt between the developed areas of Polmont and Maddiston (& California, etc) would have merit.

Council response: This extension of the green belt into this area is not considered appropriate, although countryside policies will continue to protect the area from development over the period of the plan. The primary purpose of green belt in the Proposed Plan is to separate major communities, and the land to the south of Falkirk/Polmont does not fit this criterion.

Main Issue 4: Infrastructure for Growth

The internet is becoming an increasing part of everyday life, but current new-build schemes fail to deliver competitive internet options due to the omission of 'cable' connectivity. The Council should require developers to support the installation of 'cable' or 'fibre to the home' connectivity in new developments (particularly when adjacent to areas with this facility already in place). Such a lead would be in support of the Scottish Government 'Scotland's Digital Future' Infrastructure Action Plan, and indeed would be a leading light in this area by future-proofing new developments.

Council response: Comment noted. The Proposed Plan makes no specific proposals to promote cable internet connectivity.

Main Issue 10: Climate Change

The Council should be insisting on the following, as part of planning permission: enhanced building insulation; entrance porches at all main doorways; solar photovoltaic and solar water heating installation as standard; building alignment and layout to maximise benefit/exposure to sunlight; street lighting using low energy sources, and designs to minimise light pollution; and support for ground source heating schemes (individual or community/scheme-wide).

Council response: The reduction in carbon emissions in new development is primarily delivered through the Building Standards regime. The Proposed Plan specifies that a minimum 10% of the mandatory carbon reduction standard as set out in the Building Regulations is to be met by the installation and operation of renewable technologies. It is considered that this approach will enable Scottish Government requirements to be met but also allow for sufficient flexibility. Where on-site viability is an issue, developers must demonstrate that renewable technologies cannot be incorporated in the development.

POL/B Polmont Potential New Sites

It seems reasonable to develop the Sunnyside Road site (POL/B/15) for housing (subject to school provision). However to maintain the character of the area planning constraints should include: retained mature trees and hedge along Sunnyside Road and other boundaries; provision of footpath to connect existing developments either side of POL/B/15, running parallel to Sunnyside Road; footpath provision to the school (to be suitable for cycle use); resurfacing of Sunnyside Road; the narrow section of Sunnyside Road widened; and careful planning to allow efficient use of solar energy on this south facing site.

Council response: The Sunnyside Road site is not identified as a housing proposal in the Proposed Plan.

00063 **Meek Margaret**

Comments: 8

Main Issue 1: Housing Growth

Agree with the planned level of growth.

Council response: Support welcomed. Growth has been scaled down slightly from the MIR in the light of updated household projections.

Main Issue 2: Sustainable Housing Locations

Agree with the location of housing growth.

Council response: Support noted.

Main Issue 3: Housing Need

Agree with the approach suggested but question who can afford these houses as it is mostly people on benefits who are tenants.

Council response: Comment noted

Main Issue 4: Infrastructure for Growth

Agree with the approach suggested.

Council response: Comment noted.

Main Issue 5: Green Belt

Would prefer green belt to be kept intact, but release of small areas at Bo'ness and Laurieston is acceptable.

Council response: Comment noted. In the Proposed Plan, two additional areas of green belt release have been included: a large area to the east of Bonnybridge for housing and recreation facilities; and a small area at Lochlands Industrial Estate for business use.

Main Issue 6: Countryside

Agree with the preferred approach with regard to replacing existing houses and steadings. With the present economic situation this is not a good time for restoring historic buildings.

Council response: Comments noted.

Main Issue 7: Employment Land

Would agree with the need for more employment in the Bainsford area, provided it is not too close to housing and there is no air pollution.

Council response: Comment noted. Abbotsford Business Park provides substantial opportunities for new employment in the Bainsford area.

Main Issue 8: Town Centres and Retail Provision

Agree with the preferred approach.

Council response: Support noted.

01011 **Miller Dawn**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00952 **Miller and Family Thomas**

Comments: 1

Main Issue 2: Sustainable Housing Locations

Objection is made to the identification of site at Parkhall Farm, Maddiston (POL/B/06, POL/B/18, POL/B/14 and POL/B/07) as preferred sites. There would be an impact on the Manuel Burn SINC, they are constrained by overhead power lines, the sites are prone to flooding, would increase flooding elsewhere, would have an impact on water environment and suffer from poor accessibility as set out in the site assessment. Concern over the phasing of the Parkhall/Toravon sites in that sites may be developed without appropriate phasing. Development of these preferred sites would require significant investment in infrastructure including local schools, roads and community facilities. There would be significant landscape impact and there is concern that the cumulative scale of development will breach the capacity of the Kinneil WWTW. Vellore Road experiences high levels of heavy goods traffic, particularly to Haining Nursing Home and additional development would result in further congestion. Development would result in a loss of prime agricultural land. There would also be a loss of residential amenity/security issues for Mr Miller's land and property in that development of POL/B/06 would be brought up to the woodland edge.

Council response: The focus of additional growth within the proposed plan will be at Maddiston East which will form a Strategic Growth Area as well as some limited infill opportunities. This is considered to represent the best option for greenfield expansion in the area in terms of landscape impact, accessibility, and impact on infrastructure. It is considered that this will provide sufficient choice and flexibility to meet the Housing Land Requirement.

All Strategic Growth Areas including Maddiston East are subject to specific guidance set out in the LDP. This identifies issues/constraint which will have to be comprehensively addressed including the overhead power line, landscaping, flood risk and sustainable urban drainage, access, impact on infrastructure such as schools and drainage, and safeguarding and enhancing the Maddiston SINC burn corridor.

00783 **Mitchell**

Comments: 4

Vision

It is considered that the Preferred Vision of the MIR is overly optimistic. The vision for the plan is an aspiration for growth; however this has to be tempered in the current economic climate. The preferred vision is based on 2008 household projections by National Records for Scotland which are trend based and do not take into account the downturn and the impact on completions. The housing requirements are likely to reduce throughout the Plan period. The focus for new housing should be on brownfield sites rather than greenfield releases. Strengthening and enhancing communities rather than expanding is preferable. The second alternative (set out in para 2.21) is more appropriate. A low growth scenario would negate the need for the release of SHIE/B/02 as a preferred site.

Council response: The housing target for the Proposed Plan has been scaled back from that in the MIR in the light of revised household projections. There is a strong focus on the redevelopment of brownfield land, although a number of greenfield sites are included to ensure choice and flexibility in the supply. SPP emphasises the need to provide a generous supply of land for housing.

Main Issue 1: Housing Growth

The medium growth scenario is too optimistic. Falkirk Council should plan for low growth scenario. If low growth option selected there would be no shortfall and site SHIE/B/02 would not be required. The MIR states that most of the housing land requirement is covered by existing sites up until 2024. It is considered that the second MIR (anticipated in 2019) would be better placed to consider the requirement post 2024. It is considered that it would be inappropriate to add a flexibility allowance to figures presented in para 3.3 given the optimistic household projections used. The Council needs to justify and define 'flexibility allowance' if it is to progress to Proposed Plan.

Council response: The housing growth target has been reduced to 675 units per annum from the 725 in the MIR, in the light of updated household projections. Nonetheless, the LDP is required by Scottish Planning policy to provide a generous supply of land for housing, and the inclusion of a flexibility allowance is appropriate.

Main Issue 2: Sustainable Housing Locations

It is considered that growth above and beyond existing sites should not be identified in the Rural South Housing Market Area. The Council should pursue the consolidation option focusing on regeneration and developing existing sites identified for housing.

Council response: The new settlement at Whitecross is progressing through the planning process, and is carried through into the Proposed Plan as a Strategic Growth Area. Slamannan has no active developer interest and the appropriateness of large-scale housing has had to be reconsidered. The scale of growth at Slamannan has been considerably reduced as a result.

At Shieldhill, where the market is likely to be stronger, the preferred new site at Hillcrest has been retained, as have two small sites at Avonbridge which provide further choice in an effort to stimulate the market. The Proposed Plan will continue to consolidate existing commitments in order to encourage village regeneration and reverse the decline in local services.

SHIE/B Shieldhill Potential New Sites

Objects to the identification of Hillcrest Farm, Shieldhill (SHIE/B/02) as a preferred site. The proposed site is extremely exposed, and does not integrate well with the existing village of Shieldhill due to its separation by a geographic water boundary, or to Reddingmuirhead so it cannot be viewed as a settlement expansion. The existing Hillcrest Square site should not be regarded as a precedent and the Council should retain its policy presumption against development in areas defined as countryside. The community has already been expanded to the detriment of its village identity. The Technical Report identifies a number of limitations including low/moderate accessibility and access to community facilities, access/road safety issues, peak time congestion in the B8028 and B810 corridors, education capacity, green network, major visual impact. The site forms part of an area of ecological value and development would threaten the integrity of local habitats and species. The Habitat Regulations require Falkirk Council to consider the environmental implications of the MIR on European sites. For the proposed site, there is a potential impact on the Firth of Forth SPA, the Slamannan Plateau SPA and the Black Loch Moss SAC. The site is currently used for informal recreation and there is a strong local desire to see the site allocated as a rural park with planting/path networks. The gas supply pipes to the existing Hillcrest Square are porous and require weekly pumping of water and there are weekly disruptions to the supply.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

00760 **Mitchell Alistair**

Comments: 1

SHIE/B Shieldhill Potential New Sites

Petition submitted through Change.Org objecting strongly to identification of Hillcrest Farm, Shieldhill (SHIE/B/02) as a preferred site. The community has already been expanded to the detriment of its village identity. Local Infrastructure in insufficient to support development and roads and sewers are at capacity. The site is extremely exposed - the existing Hillcrest development has suffered major storm damage. There will be loss of greenspace - area is used by dog walkers/cyclists and the site accommodates significant ecological habitats and wildlife. There are capacity issues at Shieldhill Primary and at Braes High School. There are concerns relating to the transparency of the consultation process. The gas supply pipes to the existing Hillcrest Square are porous and require weekly pumping of water and there are weekly disruptions to the supply. The existing Hillcrest Square should not be seen as a precedent and is contrary to countryside policies. The site would be better allocated as a 'rural park' for habitat retention and informal recreation.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

00507 **Mobile Operators Association**

Comments: 1

Main Issue 4: Infrastructure for Growth

There is no indication of the intention to include a generic policy on telecommunications development or supplementary guidance on the topic. Given advice in the SPP, such a policy should be included in the proposed plan, and suggested wording is provided. Any background information could be included within supplementary guidance.

Council response: Proposed Plan policy INF13 deals with Telecommunications Development

01004 **Moodie Anne V**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to

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Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01010 **Moodie Deborah Anne**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site.

Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01005 **Moodie Robert A**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site.

Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00802 **Mooney Brian**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of village and have a negative effect on local wildlife. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure (particularly education) will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00786 **Morland William**

Comments: 1

POL/B Polmont Potential New Sites

The preferred site at Middlerigg (POL/B/05) would result in coalescence of the settlements of Wallacestone and Reddingmuirhead. The area has seen a large amount of growth over the last 15 years. There are mine workings present on site, which causes flooding from the disused workings below. Development would exacerbate flooding from the burn which runs through the site. The sewerage capacity in the area cannot accommodate further development of this scale. The local road network is congested and cannot accommodate further development. There are education capacity issues and there will have to be a re-zoning exercise if development taken forward. The health clinic at Polmont is operating at capacity. Gilston would be a more appropriate location for housing due to the access on to the motorway network and the improved infrastructure.

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00264 **Morston Assets**

Comments: 6

Main Issue 1: Housing Growth

The Council's preferred option for Housing Growth is supported, notably that of reaffirming existing commitments, including the regeneration initiative at Whitecross SIRR, for the period 2024-2034. By concentrating development on committed regeneration initiatives, in particular at Whitecross SIRR, it will ensure that new housing growth makes a significant positive contribution towards enhancing rural regeneration, helping to prevent population decline and the loss of rural services. The

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need for the provision of further guidance on the scale and distribution of housing for the latter half of the plan period (i.e. 2024-2034) is raised.

Council response: Support welcomed. In terms of longer term housing provision, a number of the larger housing sites will contribute to the supply post 2024. Additional sites will be brought forward, as required, through subsequent LDP reviews.

Main Issue 3: Housing Need

The Council's proposal to lower the affordable housing site size threshold to 20 units is supported. However, the fact that committed development at the Whitecross SIRR is based upon delivery of 15% affordable housing, in accordance with existing policy guidance, needs to be reaffirmed in the policy wording. On a more general point, whilst on the whole it is preferable to meet housing need in the locality where it arises, the Council may wish to consider looking at meeting housing need on an authority-wide basis in order to assist with site viability (i.e. The Council should be willing to consider alternatives such as off-site provision where on-site provision is not viable).

Council response: Supporting comment on the 20 unit threshold noted. The percentage requirement at Whitecross is set out in the PPP consent. SG Affordable Housing will set out a sequential approach to on-site, off site and commuted sum provision to maximise flexibility of supply.

Main Issue 4: Infrastructure for Growth

The need for increased primary education capacity at Whitecross is acknowledged but the Council needs to consider its own role in delivery of increased education capacity, providing flexibility to allow a range of procurement options, including prudential borrowing. This principle should also be applied to other strategic infrastructure requirements and the Infrastructure for Growth policy wording should be drafted to reflect this.

Council response: Proposed Plan policy INF01 Strategic Infrastructure makes provision for the Council to explore traditional and innovative funding mechanisms, including prudential borrowing, to secure the provision of infrastructure.

Main Issue 8: Town Centres and Retail Provision

The Council's preferred option for town centres and retailing is supported, notably the creation of a new local centre, based on a small store, to serve the growth area at Whitecross. However, a policy wording should be formulated to provide sufficient flexibility to allow for a larger format store, which may be required to provide a suitable anchor for the proposed new local centre at Whitecross.

Council response: The Proposed Plan imposes no specific floorspace restrictions on the scale of store which would be appropriate in Whitecross. However, general policies indicate that it should be consistent with the role of the centre in the network and commensurate with the local catchment. These criteria would be applied to detailed proposals.

Main Issue 9: Strategic Access and Sustainable Travel

The Main Issues Report refers to signalisation/local widening of the M9, junction 4, to be secured through developer funding. This needs to be considered carefully in the context of viability of specific schemes, when assessing the scale of contributions that can be achieved from any single development scheme. Any policy wording will therefore need to provide sufficient flexibility to take this into account to ensure development is not unnecessarily stifled.

Council response: Proposed Plan proposal INF04 provides for the upgrading of M9J4 using developer contributions. Proposed Plan policy INF02 and related SG concerned with developer contributions, highlight the need for S75s to comply with the provisions of Circular 3/2012, and include the viability of development as a consideration for decision-makers.

Main Issue 10: Climate Change

Morston Assets are firm supporters of sustainable development and the incorporation of low carbon technologies in new development. However, the 30% target of low and zero carbon generating technologies, and its relationship to the 2010 Building Standards is queried. There is a need for flexibility in the policy wording so that alternative levels of low carbon technologies can be provided for where site viability is prohibitive.

Council response: Comments noted. The Proposed Plan specifies that a minimum 10% of the mandatory carbon reduction standard as set out in the Building Regulations is to be met by the installation and operation of renewable technologies. It is considered that this approach will enable Scottish Government requirements to be met but also allow for sufficient flexibility. Where on-site viability is an issue, developers must demonstrate that renewable technologies cannot be incorporated in the development.

00884 **Mr A McMillan and Mrs M Bryson**

Comments: 1

POL/B Polmont Potential New Sites

Welcome the identification of Parkhall East 1 (POL/B/06) as a preferred site and can confirm it is intended to bring the site forward at the earliest opportunity.

Council response: Support welcomed.

00894 **Mr Murray and Mrs McLundie**

Comments: 1

Main Issue 1: Housing Growth

Objection is made to building on agricultural land on the basis that this could have a detrimental effect on food security. The level of growth in the MIR will limit the potential of the agricultural sector in the area.

Council response: The loss of some agricultural land is necessary to deliver the vision and spatial strategy of the plan, and to comply with Scottish Planning Policy's requirements for a generous supply of housing land. This has been minimised as far as possible through a focus on brownfield sites where available.

00542 **Murdoch Smith and Co Ltd**

Comments: 3

Main Issue 1: Housing Growth

Murdoch Smith notes the Housing Needs and Demand Assessment (HNDA) outlines the need for an additional 9350 units in the period 2014-2024 (935 units/year). Despite this, Falkirk Council's Preferred Option is only to plan for 725 units/year or 7250 units over the 10 year period, some 22% below the HNDA requirements. The level of housing being proposed with the Council's Preferred Option which would fail to meet agreed requirements, as detailed within the HNDA. The sites tasked with delivering much needed new housing have not been assessed for effectiveness (whether established or newly proposed allocations). The large scale residential regeneration initiatives (SIRRs) originally designed as additional to the housing requirement are now seen as an integral part of the land supply despite, at least in some cases, significant delivery issues (marketability being a key factor). In this case the Preferred Option related to Medium Growth is not considered appropriate. This does not comply with established Scottish Planning Policy in respect of planning for the full needs of the area, Therefore, the level of growth set out in the 'High Growth' option should be fully planned for through the provision of a generous effective land supply. If the 'High Growth' option was not to be favoured at the very least the SIRR allocations should be returned to their 'in addition to' the required land supply status.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SIRRs at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing locations

Murdoch Smith believe all sites, established local plan sites and proposed new allocations, require to be tested for effectiveness. Figure 3.4 of the Main Issues Report, fails to explain the rationale for the level of development being promoted within each of the 9 sub-areas. In Rural North there appear no underlying reasons to restrict the level of development within this geographic area to the very low levels outlined within the Main Issues Report. Some of the significant environmental and infrastructure constraints in respect of Torwood and Letham, are, in fact, presently being addressed (Scottish Water upgrading works).

Council response: Section 5 of Technical Report 3 provides the rationale for the level of growth considered suitable, and the choice of sites, in each of the 9 settlement areas. Environmental and infrastructure constraints in respect of Torwood and Letham remain significant.

LET/B Letham Potential New Sites

At Letham, Murdoch Smith have clearly demonstrated throughout the SPG consultation stage that there is only one deliverable option/site within the village, the site at Letham East (LET/B/01). Therefore, in terms of all of the requirements set out in Scottish Planning Policy, in the extant development plan and within the assessment of 'effectiveness' for housing allocations set out in paragraph 55 of Planning Advice Note (PAN) 1/2010, this is the site to deliver the 40 units level of development within the village.

In short, the identified site at Letham East (LET/B/01) would represent a fully effective residential land allocation in accordance with established guidance. The site should therefore be allocated for residential use through the local development plan process.

Council response: The site at Letham East has not been identified as a housing proposal in the Proposed Plan. It has proved difficult to find a satisfactory site for village expansion which is both deliverable and enjoys community support. Consultation with residents on possible sites in 2011 proved inconclusive. A lack of services locally and continuing issues with waste water drainage has led the Council to conclude that promoting a site for housing should not be pursued in this LDP.

00583 **National Grid C/o AMEC E & I UK Ltd**

Comments: 1

Main issue 4: Infrastructure for Growth

National Grid make a general request to be involved in the consultation on the LDP and that their specific interests in terms of two national gas grid transmission pipes, FM10 and FM 11, running from Crieff to Bathgate, are taken into account in the formulation of policy and proposals. As well as any specific proposals or policies affecting the infrastructure they would also wish to be consulted on policies relating to development in the countryside, landscape and, waste and minerals.

Council response: Contact details added to consultation list. The Major Hazards and Pipelines Policy identifies how proposals will be assessed within consultation distances around pipelines and the consultation distance is identified on the proposal map.

00657 **National Grid Properties Ltd**

Comments: 2

Main Issue 3: Housing Need

The suggested quotas for the provision of affordable housing are reasonable. However, a flexible approach to tenure and phasing is needed in supplementary guidance.

Council response: Comment noted. The SG will set out a flexible approach to provision.

FAL/A Falkirk Committed Sites

The identification of the Etna Road 2 site in Falkirk as part of the preferred option is supported. However, the site should

include the SINC area since the wider area will need to be included in a remediation scheme.

Council response: Support noted. The site is extended to include the SINC area to provide flexibility, but mitigation/compensation of any habitat loss will be important in masterplanning.

00493 **Network Rail**

Comments: 9

Main Issue 4: Infrastructure for Growth

Network Rail supports the view that major infrastructure upgrades are needed to facilitate development committed through the plan period and also acknowledges the difficulties in delivering these given constraints on public sector budgets and private sector borrowing constraints. There is agreement with the preferred option of minimising development impact on infrastructure but to utilising developer contribution mechanisms when impact is unavoidable. However the focus of the policy is on major, single site infrastructure projects and takes no account of smaller but cumulatively significant impacts. This is despite acknowledging these impacts elsewhere in the MIR and supporting technical documents. Given the real cumulative impacts which will exist and their acknowledgement throughout the plan documents, consideration must be given to how to deal with them through policy and supplementary guidance. The rail network within Falkirk Council has clearly been a key consideration in preparing the MIR's vision. Where growth areas or significant housing allocations are identified close to existing rail infrastructure it is essential that the potential impacts of this are assessed. A significant increase in patronage may create the need for upgrades to the existing infrastructure. As Network Rail are a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. To ensure that developer contributions can deliver appropriate improvements to the rail network, a policy on Developer Contributions and Supplementary Planning Guidance include provisions for rail is recommended. In order to be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable.

Council response: Proposed Plan proposal INF08 supports the EGIP improvements to rail infrastructure in Falkirk Council area. Policy INF2 captures the requirement for developer contributions for physical infrastructure, which could include rail related works, and Policy INF11 provides specifically for upgrades to station car parks.

Main Issue 9: Strategic Access and Sustainable Travel

Network Rail note the Council's preferred option for Strategic Access and it is generally accepted. However they recommend that the Council's role in supporting strategic rail transport projects such as the Edinburgh-Glasgow Improvement Programme (EGIP) is recognised in policy, commentary, site safeguarding and site assessments. Overall 350km of track will be electrified. This will involve the placing of overhead line equipment along the route and associated works to bridge structures including clearance, re-deck, jack-up; and parapet works. The lines to be electrified will include those between Glasgow and Edinburgh via Falkirk High, from Cumbernauld through Falkirk Grahamston to Linlithgow, the Grangemouth branch and north through Larbert to Stirling and Dunblane. Enhancement works are proposed at Greenhill Upper Junction to increase capacity and improve journey time reliability on the Edinburgh - Glasgow primary routes and the secondary routes to Stirling. As these are physical works with a degree of commitment, via the STPR and in some cases NPF2, and as they support the Council's Vision they should be supported and/or safeguarded by reference in the text and on the proposals map of the Plan. We note the reference in paragraph 4.45 to EGIP (and also in paragraph 3.7 of Technical Report 4: Strategic Constraints) and would also suggest that any references to EGIP in the LDP are updated to reflect the wider programme benefits referred to above.

Council response: Proposed Plan proposal INF08 supports the EGIP improvements to rail infrastructure in Falkirk Council area.

ALL/B Allandale Potential New Sites

Network Rail would object to the inclusion of site at Stein's Brickworks, Allandale (ALL/B/01) in the LDP in the absence of clarity on means of ensuring there would be no risk to the underbridge UB132/060 or the overbridge to the south as a result of traffic from future development of the site. The stance taken in the MIR that this site is 'non-preferred' development site at this time is supported.

Council response: The Stein's Brickworks site has been identified as a mixed use proposal in the Proposed Plan. It is a large brownfield site within the Allandale village limit. Council is minded to grant planning permission subject to s.75 obligation.

B&B/B Bonnybridge and Banknock Potential New Sites

The site at Dykehead Farm, High Bonnybridge (B&B/B/08) has the potential to conflict with essential EGIP works and should not be included in the final plan as a preferred housing site. This site's impact has been considered together with site GRE/B/01: Greenhill Road, Greenhill as they would have similar impacts on the rail infrastructure and some of these would be cumulative given their proximity.

Council response: The site at Dykehead Farm has not been identified as a housing proposal in the Proposed Plan. The site lies within the WHS Buffer Zone and part of the site is a SAM. Other site constraints include unknown flood risk from small watercourses which bisect the site and two railway lines which form the northern and southern boundaries of the site and could have an adverse noise/vibration impact. The development of the site would require the extension of Antonine Primary School but it is far from certain as to whether this would be possible as the site is physically constrained partly due to the adjacent scheduled part of the Antonine Wall WHS.

B&B/B Bonnybridge and Banknock Potential New Sites

Network Rail support the stance taken in the MIR that the site at Milnquarter Farm, High Bonnybridge (B&B/B/07) is 'non-preferred' for housing at this time. The proposal for is likely to increase traffic through the underbridge on Broomhill Road which is height and width restricted. Any additional traffic through the bridge could increase the risk of bridge strike and

Authority Response to Contributions by Contributor for FLDP_MAIN

hence the risk of service disruption and the safe operation of the railway. This would be particularly significant on this busy route which is part of the EGIP.

Council response: The site at Milnquarter Farm, High Bonnybridge has not been identified as a housing proposal in the Proposed Plan due to the uncertainty over whether school capacity constraints could be overcome and whether the site can be designed to avoid an adverse impact on the setting of scheduled parts of the Antonine Wall WHS.

FAL/B Falkirk Potential New Sites

Network Rail object to the inclusion of the site Lochlands Industrial Estate 1 (FAL/B/05) as a 'preferred' site for economic development in the plan. There would also be objection to the inclusion of Lochlands Industrial Estate 2 (FAL/B/15). These sites are considered together as they would have similar impacts on the rail infrastructure and some of these would be cumulative given their proximity. Access to both of these sites would appear to be possible at the north end of Lochlands Loan. At this point the road goes round a tight bend before going under UB132/043 Larbert Viaduct. In the absence of detailed information showing either that heavy goods vehicles would not use this route or that there was no/limited risk of bridge strike we consider this a constraint which would prohibit the development of these sites. Any additional traffic, particularly heavy vehicles, through the bridge could increase the risk of bridge strike and hence the risk of service disruption and the safe operation of the railway.

Council response: Site FAL/B/05 at Lochlands Industrial Estate has been identified as a business/industry proposal in the Proposed Plan. The access is considered satisfactory for the scale of the site proposed. Any issues or risks associated with bridge strike can be considered as part of any detailed application for the site. Site FAL/B/15 has not been identified as a proposal in the Proposed Plan

FAL/B Falkirk Potential New Sites

Network Rail supports the designation of Lochlands Industrial Estate 2 (FAL/B/15) as a 'non-preferred' site for economic development in the plan. This site is considered together with site FAL/B/05 as they would have similar impacts on the rail infrastructure and some of these would be cumulative given their proximity. Access to both of these sites would appear to be possible at the north end of Lochlands Loan. At this point the road goes round a tight bend before going under UB132/043 Larbert Viaduct. In the absence of detailed information showing either that heavy goods vehicles would not use this route or that there was no/limited risk of bridge strike we consider this a constraint which would prohibit the development of these sites. Any additional traffic, particularly heavy vehicles, through the bridge could increase the risk of bridge strike and hence the risk of service disruption and the safe operation of the railway.

Council response: The site at Lochlands Industrial Estate 2 has not been identified as a business proposal in the Proposed Plan. The site lies within a scheduled ancient monument, giving rise to major archaeological impacts. Site lies within green belt and would exacerbate the adverse effect of the industrial estate on the landscape setting of Larbert and Falkirk.

GRE/B Greenhill Potential New Sites

The site at Greenhill Road, Greenhill (GRE/B/01) has the potential to conflict with essential EGIP works and should not be included in the final plan as a preferred housing site. This site's impact has been considered together with site B&B/08: Dykehead Farm as they would have similar impacts on the rail infrastructure and some of these would be cumulative given their proximity.

Council response: The Greenhill Road site has not been identified as a housing proposal in the Proposed Plan. There are potential noise/amenity impacts from the adjacent railway. There are also education capacity constraints. However, the key constraint to formal allocation for residential development is the likelihood of the land being required as part of the EGIP proposals.

POL/B Polmont Potential New Sites

Network Rail supports the Council's assessment of the site at Gilston South (POL/B/01) as a 'non-preferred' site for economic development in the plan. The only vehicle access to the site would appear to be over overbridge OB070/052 which has a 7.5 tonne weight limit or through a minor bridge under the canal. The proposal is likely to result in an increase in traffic using the overbridge. It would certainly be unsuitable for construction traffic and in the absence of detailed information on traffic flow might be at increased risk of bridge strike and hence the risk of service disruption and the safe operation of the railway

Council response: The Gilston South site has not been identified as a proposal in the Proposed Plan. The site comprises open countryside alongside the Union Canal, with good green network potential, and no obvious means of access for development. It is prime agricultural land. Development would have significant adverse landscape impacts and an undesirable urbanising effect on the Union Canal, which is a scheduled ancient monument.

00522 NHS Forth Valley (NHS Board)

Comments: 3

B&B/B Bonnybridge and Banknock Potential New Sites

Bonnybridge Hospital will close and the site will be disposed of during the period of the LDP. As a brownfield site it should be identified as appropriate for residential and other compatible uses.

Council response: Comments noted. Uncertainty as to whether another public use can be found for the former hospital buildings by other Community Planning partners means that this site is not identified as a housing allocation in the 2014-2024 period but it could become an option if ultimately considered surplus to public sector requirements. The site remains within the urban limit, however, so should residential or other compatible uses be proposed on site this would not in principle be contrary to policy.

Authority Response to Contributions by Contributor for FLDP_MAINL&S/B Larbert and Stenhousemuir Potential New Sites

NHS FV consider that a site at Pretoria Road / Denny Road (L&S/B/04) should be allocated for residential or healthcare on the basis that it is a logical infill site, will have safe access to Denny Road in due course, has no known constraints, and would provide a sustainable site with good access to local facilities and services. In response to the Council indicating that it is a non-preferred site, NHS FV have responded further. The site does not form part of residual land at the former RSNH which is subject to management arrangements between the Health Board / Forestry Commission. The field is agricultural land, with no public access and therefore does not function as green space. The site will be traversed by the new access to Larbert House & Walled Garden which will serve the site. The Development Framework / Masterplan & Management Framework will not be undermined. The site is suitable & appropriate for development in all respects. Further, NHS FV note that the site is not suitable for allotments agreed at the joint NHS/Council Planning Review Group.

Council response: The site has not been identified as a housing proposal in the Proposed Plan.

L&S/C Larbert and Stenhousemuir Amended Use Sites

Bellsdyke Development Group seek the removal of the Hill of Kinnaird 2 site (L&S/C/01) from employment use and its re-allocation for residential or mixed use. A case why the site is not appropriate for business uses was set out in their original submission. The submission is made by NHS FV (the landowners) who are in a consortium with developers CALA Homes & Persimmon. The Council have responded that it is a non-preferred site for alternative use, and that the site should remain for business use, as additional housing would put pressure on education. This is not accepted by NHS FV, who suggest that given the timescale for the release of this land it should be possible to come forward with appropriate solutions.

Council response: Comments noted. The Business Park was a requirement of the outline planning consent and the Planning Brief for the Bellsdyke Area. It is not accepted that it should be phased into a later stage of development.

00814 Nisbet Fraser

Comments: 1

Main Issue 2: Sustainable Housing Locations

Development of sites POL/B/13 & 17 is not supported.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00614 Ogilvie Homes Ltd

Comments: 5

Vision

Ogilvie Homes take the view that the preferred vision is lacking in its overall ambition and that it should be amended to include an elaboration of the development targets set out later in the MIR. The Council should do all it can to exploit the natural locational advantages of the area from a housing and economic development perspective.

Council response: The vision, and the spatial strategy set out to deliver it, is considered to be ambitious, particularly in the light of current economic conditions.

Main Issue 1: Housing Growth

Ogilvie Homes believe that the MIR shows a lack of ambition in its preferred medium growth strategy and a high growth strategy should be pursued in the Proposed Plan. With a 20 year plan period the plan needs to make provision for a full market recovery with the promotion of a wide range of small to medium scale sites which can be successfully integrated with existing communities.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing Locations

Ogilvie Homes believe there is scope to accommodate significantly more housing in Rural North and would commend the second alternative growth option, as described in para 3.63, which encompasses growth to the south of Airth.

Council response: The Proposed Plan supports modest growth in Rural North, in line with the MIR preferred option. Section 5 of Technical Report 3 provides the rationale for the level of growth considered suitable and the choice of sites in each of the settlement areas, taking account of environmental and infrastructure constraints. In Rural North the focus of growth remains the existing sites at Airth, augmented by an additional site at the north end of the village, and existing sites at Torwood.

AIR/B Airth Potential New Sites

The site to the south of Kennedy Drive, Airth (AIR/B/04) should be allocated within the proposed plan. Preference should be given to sites promoted by named developers. The Council has significantly overstated the environmental constraints in Airth and the land to the east of the village (AIR/B/01) should be viewed as a reasonable option for medium to long term growth.

Council response: The site to the south of Kennedy Drive, Airth (AIR/B/04) has not been identified as a housing proposal in the Proposed Plan. Considerable environmental and infrastructure constraints on growth in Airth remain. Growth in this location may have an adverse impact on the setting of Airth Castle and the adjacent Old Airth Parish Church, and allocation of a small site at the north end of the village is preferred over this one.

AIR/B Airth Potential New Sites

Ogilvie Homes believe the Glebe, Airth (AIR/B/03) should not be a preferred option to be brought forward to the PP. Site deliverability should play an important part in site selection and preference should be given to sites being promoted by named developers. AIR/B/03 is not under the control of a named housing developer.

Council response: The Proposed Plan identifies The Glebe, Airth as a housing opportunity which will augment the supply of housing land in Rural North. Its allocation has been actively promoted by the landowner through the previous Falkirk Council Local Plan processes and of this LDP.
It is considered that this small site could be accommodated without major additional impact on infrastructure, and is preferred to the alternative of growth at the southern end of the village, which is constrained by possible impacts on the setting of A listed Airth Castle and Old Airth Parish Church scheduled ancient monument.

00940 **Oliver M**

Comments: 12

Main Issue 2: Sustainable Housing Growth

The combined scale of housing growth proposed for allocation along the A803 corridor between Coneypark and Dennyloanhead will place further pressure on already overstretched community infrastructure such as schools and GP surgeries. In addition the A803 itself is projected to be at or above capacity in peak times leading to additional congestion and that any additional development will only add to problems as there are not necessarily any engineering solutions which can be found to alleviate this congestion due to the physical constraints of the area. Under current proposals the Scottish Government's vision of towns and villages where people are empowered to make their lives better will not be achieved as excessive additional housing development will break the already fragile social network that exists in the area. Delivery of a network of supporting infrastructure is key to any new housing growth and not enough detail is given within the MIR as to what form this will take or how this will be provided to accommodate the scale of proposed growth in this area.

Council response: Comment noted. The sites at Coneypark Farm 1, Mayfield Drive, Glasgow Road 1 and Glasgow Road 2 have not been identified as opportunities for housing growth in the Proposed Plan. Only one additional opportunity for housing growth along the A803 corridor between Coneypark and Dennyloanhead has been identified in the Proposed Plan meaning that the scale of housing delivered from new proposals along the corridor has been scaled back from 250 houses at the MIR stage to 20 houses.

B&B/A Bonnybridge and Banknock Committed Sites

A planning application for housing development on the Mayfield Drive site (B&B/A/01) was refused by Falkirk Council's Planning committee. An appeal against this decision was subsequently dismissed by the DPEA. In light of these decisions it is questioned why this site is still deemed to be a suitable site for housing

Council response: Comment noted. The site at Mayfield Drive is not proposed as an opportunity for housing growth in the Proposed Plan

B&B/A Bonnybridge and Banknock Committed Sites

Development of the Kilsyth Road 1 site (B&B/A/03) is not supported as it involves the loss of greenspace which is a scarce resource along the A803 corridor between Coneypark and Dennyloanhead.

Council response: Comment noted, however this site has planning permission and is currently under construction.

B&B/A Bonnybridge and Banknock Committed Sites

Development of the Kilsyth Road 2 site (B&B/A/04) is not supported as it involves the loss of greenspace which is a scarce resource along the A803 corridor between Coneypark and Dennyloanhead.

Council response: Comment noted, however, this site has been included as an opportunity for housing growth (H10) in the Proposed Plan. By adopting the Falkirk Council Local Plan (within which this was an allocated site) the Council has previously considered the loss of the green area between Higgs and Longcroft acceptable in order to provide opportunities for housing growth, and therefore the deletion of this site is not considered to be reasonable.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Coneypark Farm 1 site (B&B/B/01) would represent overdevelopment of this area. Accessing the A803 in a safe manner from this development would be problematic due to physical constraints. The A803 does not have the capacity to accommodate additional housing in this area.

Council response: Comment noted. The site at Coneypark Farm 1 (B&B/B/01) has not been included in the Proposed Plan as an opportunity for housing growth.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Coneypark Farm 2 site (B&B/B/02) would represent overdevelopment of this area. Accessing the A803 in a safe manner from this development would be problematic due to physical constraints. The A803 does not have the capacity to accommodate additional housing in this area.

Council response: Comment noted. The site at Coneypark Farm 2 (B&B/B/02) has not been included in the Proposed Plan as an opportunity for housing growth.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Glasgow Road 1 site (B&B/B/04) is of concern due to its proximity to the existing bonded warehouse complex at Dennyloanhead. It is suggested that this potential site is within the exclusion zone which should be maintained around any major hazard.

Council response: Comment noted. The site at Glasgow Road 1 (B&B/B/04) has not been included in the Proposed Plan as an opportunity for housing growth. The site is not however impinged upon by the major hazard consultation zones of the adjacent bonded warehouse complex. These consultation zones are shown on Proposal Map 1.

Authority Response to Contributions by Contributor for FLDP_MAINB&B/B Bonnybridge and Banknock Potential New Sites

Development of the Garngrew Road site (B&B/B/03) would need to be preceded by an upgrade of the narrow Garngrew Road. A traffic management plan would also be required as the Old Cumbernauld Road is often used as a rat run when the A803 is backed up.

Council response: Comment noted.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Glasgow Road 2 site (B&B/B/05) would involve the loss of greenspace which is a scarce resource along the A803 corridor between Coneypark and Dennyloanhead.

Council response: Comment noted. This site is not included as an opportunity for housing growth in the Proposed Plan.

B&B/B Bonnybridge and Banknock Potential New Sites

Development of the Kilsyth Road 4 site (B&B/B/06) would represent an overdevelopment of the area which the social infrastructure of the area does not have the capacity to accommodate. Development would totally change the character of the area from a small village to a town.

Council response: Comment noted. This site was not identified as a preferred new site for housing growth in the Main Issues Report and is not included as an opportunity for housing growth in the Proposed Plan.

DEN/A Denny Committed Sites

Whilst the development of the Mydub 1 site (DEN/A/08) is welcomed, the Denny Eastern Access Road should be completed before any development on this site takes place in order to remove congestion from an already overburdened traffic system at Denny Cross.

Council response: The Council will consider the results of its consultation on a draft SPG which sets out an approach to the delivery of DEAR dependent largely on developer contributions.

DEN/B Denny Potential New Sites

Whilst the development of the Mydub 2 site (DEN/B/03) is welcomed, the Denny Eastern Access Road should be completed before any development on this site takes place in order to remove congestion from an already overburdened traffic system at Denny Cross.

Council response: The Council will consider the results of its consultation on a draft SPG which sets out an approach to the delivery of DEAR dependent largely on developer contributions.

01025 Owner/Occupier

Comments: 4

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00826 **Pargeter Tony**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on site at Standrigg Road (POL/B/17). Local infrastructure (particularly transportation, education and healthcare) will not be able to cope with the scale of development envisaged on this site.

Council response: The site is not identified as a development proposal in the Proposed Plan.

00842 **Paterson Fiona**

Comments: 1

Main Issue 2: Sustainable Housing Locations

Development of housing on sites POL/B/2,3,13,15 & 17 is not supported. Local infrastructure (particularly schools, transportation and healthcare) will not be able to cope with the scale of development envisaged on all of these sites which will have an adverse effect on the local environment and lead to an increased risk of flooding.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00827 **Paterson Thomas**

Comments: 1

RUR/B Rural Area Potential New Sites

Support for more houses in Blackbraes, a former mining village.

Council response: No allocation has been made at Blackbraes in the Proposed Plan. The site is located in the countryside outside the boundary of existing settlements and its development would be considered to be unsustainable due to the distance from existing services. The site furthermore does not correspond with the footprint of the former community at Blackbraes. Allocated sites in the wider Rural South area are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

00819 **Penman John**

Comments: 2

Main Issue 6: Countryside

Scottish Planning Policy (SPP) requires Councils to support more opportunities for small scale housing development in rural areas. It is not considered that the Council's preferred approach goes far enough in respect of meeting the requirements of SPP. Cloybank Estate (near Banknock) is a unique, mixed use facility based on rural sports and youth training in rural skills. The recession has severely checked expansion of the programme to the point where its viability is now in question. If the project is to be maintained a significant investment will be required and it is considered that an enabling residential development will provide the necessary funding, enabling Cloybank to survive and grow, bring with that growth full and part time employment opportunities. If Cloybank Estate is to survive and thrive as a rural business, engaged in tourism, recreation and education then further relaxations to the policy of housing in the countryside will be required. Precedents already exist where the Council has accepted new housing in the countryside as an enabling development for a rural enterprise, eg Forrester Quarter Equestrian Centre where it agreed a small amount of housing was necessary to secure the viability of the development.

Council response: It is not considered that a general provision for allowance in the countryside to cross-fund the establishment and running of rural businesses is appropriate.

B&B/B Bonnybridge and Banknock Potential New Sites

A strip of land along the side of Braeface Road immediately south of the Cloybank Access Road should be considered for redesignation to residential use. Cloybank Estate is already a mixed use parcel of land, education and leisure pursuits being the primary activities with an emphasis on sustainability. Extending this use to accommodate no more than eight sustainably built, zero carbon homes is a logical advancement of this policy, entirely within the parameters of the entire project. At the same time such a development would provide a suitable buffer to the large and highly visible housing estate granted permission on the other side of Braeface Road.

Council response: The site is not a natural extension to Banknock and the position of any development would extend to a more elevated and prominent position than the adjacent Banknock North site to the East. As such, the site is not considered to be appropriate for development in the 2014-2024 period.

00712 **Persimmon Homes (East Scotland) Ltd**

Comments: 3

Main Issue 1: Housing Growth

Persimmon Homes do not consider the Preferred Option related to Medium Growth appropriate and therefore, the level of growth set out in the 'High Growth' option should be fully planned for through the provision of a generous effective land supply. Alternatively if the 'High Growth' option was not to be favoured at the very least the SIRR allocations should be returned to their 'in addition to' status in the required land supply. Persimmon Homes note the requirements outlined within the Housing Needs and Demand Assessment (HNDA) which sets out the need for an additional 9350 units in the period 2014-2024 (935 units/year). But Falkirk Council's Preferred Option is only to plan for 725 units/year or 7250 units over the 10 year period, some 22% below the HNDA requirements.

The potential shortfall of supply over identified need is further compounded by the following factors: no assessment of the effectiveness of all the committed sites carried forward from FCLP; no assessment of the effectiveness of the proposed new local development plan sites: the SIRR allocations in Whitecross, Slamannan, Banknock and Bo'ness are now considered as part of the land supply rather than as special initiatives in addition to the land supply, as per the approved structure plan and the adopted local plan. The level of housing being proposed with the Council's Preferred Option would fail to meet agreed requirements, as detailed within the HNDA. No matter the level of new housing provision planned for in the local development plan the lack of effective land allocations will thwart timeous delivery of new housing required to meet community needs.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SIRRs at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing Locations

Persimmon Homes believe all sites, established local plan sites and proposed new allocations, require to be tested for effectiveness. The allocation of further housing sites through the local development plan, is set out in Figure 3.4 of the Main Issues Report. But this figure and supporting text fails to explain the rationale for the level of development being promoted within each of the 9 sub-areas.

The Preferred Option for Denny seeks to re-affirm commitment to existing sites while promoting modest settlement expansion, largely through extension to Mydub, Carrongrove Paper Mill and Broad Street sites. No justification is given for choosing these sites, as the contents of Technical Report 2 'Site Assessment' and Technical Report 3 'Housing Requirements & Settlement Growth

Options' provide only a broad assessment of the area/sites. The position being promoted within the Main Issues Report in the Denny sub-area is imbalanced, illogical and fails to meet the Council's preferred development strategy for the local development plan area. It is an over-concentration on a small number of sites (Mydub and proposed extension, Carrongrove Mill and proposed extension, and the former Denny High School site), such over-concentrations limiting development output and potentially saturating likely demand in these areas. This does not assist housing delivery. It is also the case that Technical Report 2 'Site Assessment' is misleading in terms of the irresolvable development constraints identified as affecting the candidate site at Northfield Road, Dunipace.

Council response: The Proposed Plan provides for a mix of large and small sites to meet the Denny/Dunipace settlement additional housing requirement of 408 homes by 2024. The development of suitable windfall sites on land within the urban limit under policy HSG03 can provide further housing choice. Section 5 of Technical Report 3 provides the rationale for the level of growth considered suitable and the choice of sites in each of the 9 settlement areas.

DEN/B Denny Potential New Sites

It is unclear to Persimmon Homes why the site at Northfield Road, Dunipace (DEN/B/04) has not been allocated for housing development, as it constitutes one of 'smaller sites that make use of spare infrastructure capacity, are potentially easier to deliver, and have more limited environmental implications'. By limiting numbers (circa 30 units) and the area where the development would occur (protecting all environmental assets, addressing potential flooding issues, etc), an appropriate form of development would be delivered. The site would make use of existing infrastructure, including capacity at Dunipace Primary School. Indeed, it is noted that the capacity at Dunipace Primary School is less than 80% presently and with the development (circa 30 units), this would only increase to 83%. The allocation of this site for a limited number of house units (30 units), taking on board the identified constraints (which can all be satisfactorily addressed) would represent an appropriate and sustainable use of land fully in accordance with the underlying requirements of Scottish Planning Policy; add to the choice and variety of residential locations/environments available within the area and help to redress the clear imbalances noted within this sub-area, particularly the over concentration of development in Denny and lack of options in Dunipace; and be a fully effective site that would positively contribute to housing delivery within the local development plan period.

Council response: The Northfield Road site has not been identified as a housing proposal in the Proposed Plan. While the site is reasonably accessible to local community infrastructure and services and occupies low grade land within the urban limit, the whole site is susceptible to 1:200 flood risk from the Avon Burn (the site's northern boundary) and from its tributary on the southern boundary. As there are 9 other sites with more favourable characteristics for development within Denny/Dunipace the principles of national advice on flood risk on greenfield sites have been applied and this site is not being taken forward for development.

00817 **Pow Robert**

Comments: 7

Main Issue 3: Housing Need

The requirement for 15% affordable housing on sites in Bo'ness is unreasonable given that there is only an assessed annual need for two affordable houses per annum in Bo'ness.

Council response: The Council has adopted a two tier approach to applying its affordable housing requirement, 15% or 25%. The Bo'ness requirement is set at the lower 15% level to reflect the lower level of need there in comparison to more pressured areas. All settlement areas have to make a contribution towards meeting the overall need across the Council area.

Main Issue 4: Infrastructure for Growth

The setting of developer contributions through supplementary guidance is objected to, since it does not have to go through detailed public consultation. Any developer contributions must comply with Circular 1/2010 and must fairly and reasonably relate in scale and kind to the development.

Council response: All SG will be subject to public consultation and for those concerned with developer contributions the provisions of Circular 3/2012 will be adhered to.

Main Issue 5: Green Belt

The Kinglass Farm site is not currently in the green belt, yet it is identified as one of the areas for removal from the green belt.

Council response: There are two Kinglass Farm sites, only one of which involves green belt release.

Main Issue 3: Housing Need

There should be no requirement for affordable housing in Grangemouth as part of private housing sites given that there is an acknowledged oversupply of affordable housing in the town.

Council response: The requirement for a contribution in Grangemouth reflects a pragmatic approach to sharing provision across settlement boundaries to meet the overall need of the whole council area.

Main Issue 5: Green Belt

Inveravon Steadings should be identified as a minor green belt release, or otherwise removed from the green belt.

Council response: It is not considered appropriate to remove the site from the green belt. The A904 is the proper and logical boundary for the green belt in this location. The removal of small steading sites from within the green belt would be inconsistent with maintaining the integrity and purpose of green belt policy.

BNS/A Bo'ness Committed Sites

The size of the site at Kinglass Farm is incorrect - it should be 0.85ha not 0.7ha. The indicative capacity should be 36 rather than 15. An indicative layout is provided showing how this would be accommodated. The indicative layout also suggests a proposed additional area for housing and open space to the east of Drumacre Road. The requirement for 15% affordable housing is unreasonable for this site, given the assessed need in Bo'ness.

Council response: The site size has been corrected and the indicative capacity amended to reflect the latest indicative layout. The affordable housing requirement reflects the Council's most recently adopted policy.

GRA/B Grangemouth Potential New Sites

Inveravon Steadings should be allocated for small scale mixed use development consisting of residential, business and tourism facilities, and removed from the green belt. An indicative proposal is submitted showing 14 houses, B&B and cafe. The site links well with the Antonine Wall and National Cycle Route 76 as a tourist location.

Council response: The site has not been included as a proposal in the Proposed Plan. It is subject to a range of constraints including the presence of the Antonine Wall WHS, the proximity to Avondale landfill, access constraints and green belt issues. Any proposals for redevelopment of the steading are best assessed on their merits against countryside policies, rather than through an allocation in the plan.

00816 **Propinvest Callendar LLP**

Comments: 1

Main Issue 8: Town Centres and Retail Provision

The preferred option of supporting and enhancing the network of existing centres is supported, as is the proposal for a new strategy for Falkirk Town Centre. The opportunity to diversify use in the Town Centre is recognised. The conclusion that there is no case for additional comparison floorspace is supported.

Council response: Support noted.

00426 **Reddingmuirhead and Wallacestone Community Council**

Comments: 6

Main Issue 2: Sustainable Housing Locations

The Community Council strongly opposes the Council's growth strategy for the area. Further large-scale development will increase pressure on existing infrastructure. There is concern that the as part of the settlement strategy villages will coalesce further and that access to green space will be lost. It is in conflict with the Open Space Strategy, in which Wallacestone is identified as having a lack of provision.

Authority Response to Contributions by Contributor for FLDP_MAIN

Council response: The scale of development in the area has been reduced in the Proposed Plan, compared with the MIR.

Main Issue 4: Infrastructure for Growth

Concern is expressed that developers do not deliver community facilities as promised. Concern expressed about roads capacity and increasing congestion. Particular area of concern is Brightons Cross. The health centre is at capacity. Concern regarding education capacity. Object to rezoning of primary school catchments and capacity at Braes High School. The Open Space Strategy identified the fact that there is an underprovision in the Braes. This should be addressed. Poor definition of 'affordable Housing'. Clarification needed to address affordability issues in area. Concerns raised about parking issues and pressure on Polmont Station.

Council response: The delivery of facilities required to mitigate the impact of existing development is an issue for the Development Management and planning enforcement process. Proposed Plan policy INF06 provides for the impact on health care facilities from new development and impacts on education capacity are provided for in policy INF05. Policy INF04 requires all new development to provide open space proportionate to its scale and taking account of the requirements of the Council's Open Space Strategy. The definition of, and provision for, affordable housing is covered in policy HSG02 and associated SG. Parking issues at Polmont Station can be addressed through policy INF11.

POL/B Polmont Potential New Sites

The Community Council objects to the identification of Middlerigg (POL/B/05) as a preferred site. Roads, schools and drainage are all highlighted as being stretched. The area's history as a mining area means that there is the presence of former mineworkings across the locality, including at Middlerigg. There has already been subsidence issues at Braes High School and the surrounding area. The Middlerigg site as has sensitivities surrounding it, and historical importance due to the Redding Pit Disaster. The centenary is in the lifetime of the plan.

Council response: The site has not been identified as a proposal in the Proposed Plan, in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

POL/B Polmont Potential New Sites

There are concerns about the Sunnyside Road site (POL/B/15) in that there is no footpath on the Brightons end, and development will effectively join Brightons to Wallcestone. Development will increase traffic on B805 at an already dangerous junction close to Quarry Brae.

Council response: The site has not been identified as a housing proposal in the Proposed Plan, in recognition of effectiveness and education capacity issues.

POL/B Polmont Potential New Sites

The Community Council does not support the non-preferred sites at Standrigg Road. Standrigg Road on to which they would access is narrow and could not carry more traffic and has approx 12 sets of speed bumps. Most of the traffic would then go onto the B805 which is now at capacity. There are capacity issues at Wallacestone Primary. These developments are large, and would remove vast tracts of open countryside.

Council response: The Standrigg Road sites, which were non-preferred sites in the MIR, have not been identified as housing proposals in the Proposed Plan.

SHIE/B Shieldhill Potential New Sites

The Community Council also objects to the identification of Hillcrest Farm, Shieldhill (SHIE/B/02) as a preferred site. The site has a history of planning application refusals and would result in creeping ribbon development resulting in the coalescence of Shieldhill and Reddingmuirhead.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

00823 **Reid J**

Comments: 1

RUR/B Rural Area Potential New Sites

Housing at Blackbraes (RUR/B/02) because of its proximity to California. It is not envisaged that a small housing development would put pressure on local services.

Council response: No allocation has been made at Blackbraes in the Proposed Plan. The site is located in the countryside outside the boundary of existing settlements and its development would be considered to be unsustainable due to the distance from existing services. The site furthermore does not correspond with the footprint of the former community at Blackbraes. Allocated sites in the wider Rural South area are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

00064 **RFA Development Planning Consultants**

Comments: 2

Main Issue 1: Housing Growth

The overall spatial approach based on 'medium growth' is flawed and not borne out by analysis identifying fast housing growth and expansion within a preferred market area and a sustainable location. It does not therefore address the challenges identified within the MIR in relation to population, demographic change and settlement growth (Paragraph 2.14).

Authority Response to Contributions by Contributor for FLDP_MAIN

The Planning Authority should be planning for recovery and growth. This approach is contrary to the SPP and government guidance. The preferred approach is deficient in terms of housing land provision and the assumptions in relation to land supply and requirement in the area (Main Issue 1), as indicated by internal inconsistencies in the HNDA.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SRRs at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

POL/B Polmont Potential New Sites

Objects to the non-inclusion of Standrigg Road East and West (POL/B/13 and POL/B/17) as preferred sites. It is considered that the sites would meet deficiencies in the housing land supply, would make a positive contribution to the Green Network, and would promote local regeneration.

Council response: The focus of additional growth within the proposed plan will be at Maddiston East which will form a Strategic Growth Area as well as some limited infill opportunities. This is considered to represent the best option for greenfield expansion in the area in terms of landscape impact, accessibility, and impact on infrastructure. It is considered that this will provide sufficient choice and flexibility to meet the Housing Land Requirement.

The sites at Standrigg Road were not brought forward into the Proposed Plan. Development in this location would have a significant landscape impact as well as impacts on the adjacent SINC and green network. The sites have low/moderate accessibility and there are road capacity issues. There are major education capacity issues, particularly in terms of primary provision and re-zoning would be required to accommodate development of this scale.

00785 **Robb Ruth**

Comments: 2

Main Issue 3: Housing Need

There is little provision for the housing needs of elderly people. This should be retirement housing, not sheltered housing. Suitable sites exist in Bo'ness, e.g. Mannings old yard.

Council response: The policy thrust of the Local Housing Strategy for the elderly is to adapt residents' housing in situ rather than provide new build accommodation. If developers come forward with proposals for retirement housing, the policy framework allows for applications on infill sites to be considered on their merits.

Main Issue 4: Sustainable Housing Locations

Further growth in Bo'ness will increase road safety problems on the A706. There are water supply problems in the area which may also be exacerbated by additional housing.

Council response: The site is included as a proposal in the Proposed Plan. Site assessment does not suggest any overriding infrastructural issues. Mitigation of any road safety issues can be considered as part of detailed proposals.

00848 **Robertson Jim**

Comments: 4

RUR/B Rural Area Potential New Sites

Support for consideration of Wester Jaw (RUR/B/05) site, for which there is developer interest, as an 'extra allocation' to allow flexibility in case the existing allocations and preferred sites prove to be unviable.

Council response: The site has not been identified as a proposal in the Proposed Plan. It is physically detached and isolated from Slamannan and does not represent a logical extension to the village. There would be significant landscape impacts and potential adverse impacts on the Slamannan Plateau SPA.

RUR/B Rural Area Potential New Sites

Support for consideration of Hillhead Farm site (RUR/B/06), for which there is developer interest, as an 'extra allocation' to allow flexibility in case the existing allocations and preferred sites prove to be unviable.

Council response: The site has not been identified as a proposal in the Proposed Plan. It is physically detached and isolated from Slamannan and does not represent a logical extension to the village. There would be significant landscape impacts given the topography of the site.

SLA/B Slamannan Potential New Sites

The site at Southfield Farm, Slamannan (SLA/B/01) is considered to be potentially ineffective.

Council response: The Southfield Farm site has not been identified as a proposal within the Proposed Plan. The overall scale of housing in the village has been scaled back to what are considered more realistic levels, in the light of development constraints and market conditions.

SLA/B Slamannan Potential New Sites

The site at Hillend West, Slamannan (SLA/B/02) is considered to be potentially ineffective.

Council response: The Hillend West site has been identified for housing development in the Proposed Plan as part of the wider Hillend Farm site (H70). However, the view has been taken that the sites will not contribute to the housing land supply in the period 2014-24 due to market conditions and development constraints.

01021 **Robertson Mark, Sandra & Lyndsay**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01022 **Rodger C**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00769 **Rowles N**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of the village. Sites POL/B/13,15 & 17 are not supported. Local infrastructure (particularly transportation and education) will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00648 **RSPB Scotland**

Comments: 10

Main Issue 5: Green Belt

The MIR states that the preferred option for green belt is to maintain strategic green belt areas with the purpose 'to complement the green network by protecting areas with potential for outdoor access and recreation'. RSPB agree that the green belt should compliment the green network. The area to the east of A905 at Skinflats is identified in Technical Report 7 as a key green network corridor. This has not been considered in the justification provided in 3.100. There is concern that the removal of the green belt to the east of A905 at Skinflats could lead to additional development close to the Firth of Forth SPA. We would welcome wording to the effect that 'the removal of the green belt at Skinflats should not be seen as an indication that development in this area will meet with approval'.

Council response: The area at Skinflats continues given protection from development through a number of relevant policies including countryside policies, flooding policies and biodiversity policies, and there is no implication that development will considered be any more appropriate here than before. Green belt designation is no longer considered appropriate because the area does not satisfy the relevant policy criteria.

Main Issue 10: Climate Change

RSPB support the Council's preferred option for renewable energy.

Council response: Support welcomed.

Main Issue 10: Climate Change

RSPB welcome the support for investigation into managed realignment on the Inner Forth. We believe this is a key mechanism for sustainable flood alleviation, with the ability to deliver a range of wider benefits. Would like to see an additional statement to the effect that Falkirk Council will cooperate with other councils along the Inner Forth to deliver sustainable flood alleviation. This is more likely to be effective than each council working in isolation. The recognition that flood management mechanisms will have to take into account the Firth of Forth SPA is also welcomed.

Council response: Comments noted. Opportunities may exist to promote natural flood management along a number of watercourses to help to reduce overall flood risk. This could include wetland restoration, riparian planning, flood plain creation and re-connecting modified watercourses to their natural flood plains. However, it is not considered prudent to promote these opportunities in an uncoordinated fashion as some natural flood management measures may actually have an adverse effect on the flood profile of a watercourse. Where resources allow, the Council will promote the study of the potential for natural flood management measures on a catchment by catchment basis and any measures identified will be promoted through the Local Flood Risk Management Plan and highlighted in subsequent versions of the LDP.

Policy RW06 (3) now states: 'Where suitably robust evidence suggests that land contributes or has the potential to contribute towards sustainable flood management measures development will only be permitted where the land's sustainable flood management function can be safeguarded.'

Main Issue 12: The Green Network

RSPB support the Council's preferred option for the Central Scotland Green Network. There should also be consideration of ways to ensure that developer contributions can be used in a way that supports the development of the Green Network. For example, a specific policy that requires contributions towards off site greenspace improvements would be welcomed.

Council response: Comment noted. Policy GN01 "Falkirk Green Network" requires that new development, and in particular the strategic growth areas and strategic business locations, should contribute to the green network, where appropriate, through the integration of green infrastructure into masterplans or through enabling opportunities for green network improvement on nearby land.

Main Issue 12: The Green Network

RSPB support the Council's preferred option for protected habitats and welcome the recognition that, in addition to the potential for enhancement through the Green Network, there is also a need to protect and enhance specific sites and species.

Council response: Comments noted.

Main Issue 14: Waste and Minerals

RSPB generally agree with the Council's preferred option for minerals but wish to see a statement to the effect that 'no new sites for peat extraction will be permitted'. This reflects Government policy and the increasing recognition of the value of peatlands.

Council response: The comments are noted. The area has an existing commercial peat extraction site and any additional proposals would be assessed against the general minerals policy.

Appendix 2: Proposed Supplementary Planning Guidance

RSPB welcome the proposal to make the Supplementary Guidance on Biodiversity and Development a statutory document.

Council response: Comment noted. Supplementary Guidance SG05 "Biodiversity and Development" will cover this topic

Main Issue 2: Sustainable Housing Locations

RSPB wish to see the housing allocations, including the Committed Housing Sites, to the west of Slamannan and north of the B803 removed, as housing at this location will limit the foraging range of the bean geese, for which the Slamannan Plateau SPA is designated. Whilst in relatively low numbers, the geese regularly use the fields adjacent to the proposed housing sites. If housing were sited as proposed, it would almost certainly prevent the geese from using them.

Council response: The scale of housing proposed in Slamannan has been reviewed and reduced. Hillend Farm remains an allocated site (H70). The Council believes that, with suitable mitigation, that there will be no adverse effect on the Slamannan Plateau SPA arising from the development of the site. This will be demonstrated through the Habitats Regulations Appraisal of the plan.

Main Issue 1: Housing Growth

Reference should be made in Main Issue 1 (Housing Growth) to the greenspace network, e.G. To direct growth to places where it will support sustainable development goals, community regeneration and allow development of the greenspace network.

Council response: Comment noted. The importance of capitalising on green network opportunities in Strategic Growth Area is emphasised in the Proposed Plan.

GRA/A Grangemouth Committed Sites

RSPB strongly welcome the removal of the safeguarded site at Kinneil Kerse (GRA/A/04). It would be difficult for development in this area not to have an adverse impact on the Firth of Forth SPA. The removal of this safeguard makes it possible to look at other options for the site, including ones which may benefit biodiversity.

Council response: Support noted. The site at Kinneil Kerse (GRA/A/04) has not been identified as an economic development proposal in the Proposed Plan.

00767 **Samson David**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of the village. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00982 **Scobie James**

Comments: 5

Vision

The preferred vision set out in the MIR is supported, subject to a realisation by the Council that delivery of development is just as important as where it is located, in terms of sustainability.

Council response: Support welcomed. The importance of deliverability is recognised.

Main Issue 1: Housing Growth

The Preferred Option related to Medium Growth is not considered appropriate. This does not comply with established Scottish Planning Policy in respect of planning for the full needs of the area. The level of housing being proposed with the Council's Preferred Option would fail to meet agreed requirements, as detailed within the HNDA. The sites tasked with delivering much needed new housing have not been assessed for effectiveness (whether established or newly proposed allocations). The large scale residential regeneration initiatives (SIRRs) originally designed as additional to the housing requirement are now seen as an integral part of the land supply despite, at least in some cases, significant delivery issues (marketability being a key factor). Therefore, the level of growth set out in the 'High Growth' option should be fully planned for through the provision of a generous effective land supply. If the 'High Growth' option was not to be favoured at the very least the SIRR allocations should be returned to their status of 'in addition to' the required land supply. It is likely that the High Growth option housing levels are unachievable at present but as the Plan runs from 2014 to 2024 it would be wrong to conclude the economy will not recover during that period and output levels will increase.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SIRRs at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 2: Sustainable Housing Locations

The preferred option for growth in Rural North, which is restricted to one new preferred site to Airth, is not supported. All sites, established local plan sites and proposed new allocations, require to be tested for effectiveness. Figure 3.4 of the Main Issues Report fails to explain the rationale for the level of development being promoted within each of the 9 sub-areas. In Rural North there appear to be no underlying reasons to restrict the level of development within this geographic area to the very low levels outlined within the Main Issues Report. Some of the significant environmental and infrastructure constraints in respect of Torwood and Letham, are, in fact, presently being addressed (Scottish Water upgrading works).

Council response: The Proposed Plan supports modest growth in Rural North, in line with the MIR. Section 5 of Technical Report 3 provides the rationale for the level of growth considered suitable and the choice of sites in each of the settlement areas. In Rural North the focus of growth remains the existing sites at Airth, augmented by an additional site at the north end of the village, and existing sites at Torwood.

TOR/B Torwood Potential New Sites

The position of the MIR of no growth in Torwood oversimplifies the potential of the village in regard to its accessibility and its role in meeting market niches which are still prospering in difficult economic times. The proposed 12 plots at TOR/B/04 would fit in the established landscape and are fully deliverable in the plan period, unlike other sites in Rural North. Their development would allow Mr Scobie to make significant improvements to the Tor Wood in terms of facilities and public access so this is not just a housing proposal.

Council response: The site at Glen Road (TOR/B/04) has not been identified as a housing proposal in the Proposed Plan. This site is mostly formed from cleared woodland, which is regenerating. Although part of it could be seen as a rounding off of the village envelope, ecological and amenity considerations suggest it should be remain undeveloped as part of the woodland. The village has no services and poor accessibility to services and community infrastructure in Larbert. Further housing will put additional pressure on Larbert HS. The village has seen considerable incremental growth in relation to its size over recent years, overstressing waste water capacity, and further significant growth is therefore not considered appropriate.

TOR/B Torwood Potential New Sites

The position of the MIR of no growth in Torwood oversimplifies the potential of the village in regard to its accessibility and its role in meeting market niches which are still prospering in difficult economic times. Site TOR/B/05 lies directly opposite the established development of the village and the residential component provides a street frontage. There are also opportunities for commercial and recreational uses to emerge. By facilitating a limited scale of development south of the A9, it provides a core to the village including entrance features and improved road safety.

Council response: The site East of A9 (TOR/B/05) has not been identified as a housing proposal in the Proposed Plan. This medium sized site is currently used as grazing land, is all grade 2 prime agricultural land and would represent the expansion of Torwood on to the eastern side of the A9, which is not considered desirable at this time. The village has no services and poor accessibility to the nearest services and community infrastructure. Further housing will put additional pressure on Larbert HS. The village has seen considerable incremental growth in relation to its size over recent years, overstressing waste water capacity, and further significant growth is therefore not considered appropriate.

00990 **Scott A**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00516 **Scottish Canals**

Comments: 5

Main Issue 2: Sustainable Housing Locations

The recognition of Tamfourhill as a committed mixed use site is welcomed. Consultation should take place with BWS on other canalside sites which are included. The canals offer the potential for alternative, sustainable forms of living through residential boats. BWS will be progressing a number of areas for residential moorings and will continue to work in partnership with Falkirk Council to deliver this ambition. The Proposed Plan should recognise the contribution living on the canal could make towards sustainable housing objectives.

Council response: Support noted. Support for residential moorings in appropriate locations has been added to the canals policy in the Proposed Plan.

Main Issue 4: Infrastructure for Growth

As part of the consideration for future infrastructure requirements it is important to include the need to continue to invest in the canals infrastructure. In relation to the preferred option for infrastructure, BWS supports this option and would encourage the Council to work in partnership with BWS to prepare specific supplementary guidance on how developer contributions could enhance canal infrastructure and amenities (e.G. Public realm).

Council response: The Proposed Plan supports a number of canal related proposals which should enhance canal infrastructure and amenities.

Main Issue 7: Employment Land

BWS welcomes the preferred option of the series of interconnected networks and nodes being identified as the basis for the spatial development of tourism in the area. The four nodes identified as part of the Canal Network are as follows: Falkirk Wheel / Portdownie (Tamfourhill); Rosebank; Helix / Falkirk Gateway; Gilston / Whitecross. These locations all have scope for further development and whilst there are ongoing projects in some of these BWS would welcome further discussion with the Council on all canal-related development nodes.

Council response: Support noted.

Main Issue 10: Climate Change

BWS is keen to explore flood prevention and drainage solutions with Falkirk Council in respect of canal side development. Reference in supplementary guidance to the canal framework as a potential flood and drainage solution would be welcomed. The canals also offer sustainable development opportunities through green energy (e.g. hydro) and providing heating and cooling solutions for developments.

Council response: Comments noted. Supplementary Guidance will be reviewed in advance of adoption of the LDP. The policies within the Proposed Plan are supportive of opportunities for green energy developments and the Council will seek to maximise opportunities for green energy as part of new development coming forward.

Main Issue 12: The Green Network

Reference to the canals as part of the green network is welcomed.

Council response: Support noted.

00447 **Scottish Enterprise**

Comments: 5

Vision

Scottish Enterprise supports the MIR preferred vision. The scale and overall direction of growth needs to be clearly set out in thre PP. The key strategic development opportunities, policies and proposals need to be developed in support of the Grangemouth area in particular.

Council response: Support welcomed.

Main Issue 2 Sustainable Housing Locations

Scottish Enterprise supports the preferred option for Grangemouth set out in para 3.46. It is important to note that the Calachem Ltd plant is located close to the Wood St site and produces a range of dangerous and hazardous substances which are covered by COMAH and other regulations. There is also planning advice for developments near hazardous installations (PADHI) which should be taken into account when reviewing development options and policy allocations for this site.

Council response: The Proposed Plan continues to promote consolidation in Grangemouth. However the site at Wood Street is identified as housing proposal H34 in recognition of its 'minded to grant' planning application status. Policy BUS05 provides the policy advice for development proposals in the vicinity of hazardous installations and for consents which would extend hazard consultation distances.

Main Issue 4 Infrastructure for Growth

Scottish Enterprise supports the preferred option for infrastructure in para 3.95. Improved connectivity between Grangemouth and the strategic road network needs to be proactively supported in the PP in addition to enhancements in the rail infrastructure. Policies and proposals to protect the port, petrochemical complex and residential areas from coastal flooding should be seen as crucial in unlocking the potential of the area. In addition to measures set out in Fig 3.8, specific mention should be made of J5 and J6 improvements. It may also be beneficial to mention the evaluation of Energy/Power capacity through preparation of an energy masterplan to address potential constraints.

Council response: Proposed Plan proposals INF01, INF02, INF03, INF07 and INF08 all support improvements to the connectivity of Grangemouth and proposal INF22 provides for the creation of flood defences.

Main Issue 7 Employment land

Scottish Enterprise believe there is a need to evaluate the quality as well as the quantity of land for business use. It may be appropriate for the PP to review effectiveness of existing allocations and reallocating them for sustainable alternative uses and replacing those with other allocations more suited to market demand. SE does not support the preferred option deleting Kinneil Kerse and instead the potential of the site should be assessed against the needs of the adjacent chemical installations and pipeline corridors.

SE supports the preferred option at para 4.20 of retaining core business and employment areas.

Council response: Technical Report 5 provides an assessment of the supply of employment land in Falkirk which, as far as possible within the limits of available information, took account of quality and effectiveness issues, as well as sustainability and environmental constraints. Indeed this process informed the consideration of the Kinneil Kerse site, where lack of development interest from the chemical companies over a sustained period, significant flood risk and proximity to the Firth of Forth SPA resulted in the decision not to allocate the site in the Proposed Plan.

Main issue 10 Climate Change

Scottish Enterprise supports the preferred option at para. 5.17 maintaining the Council's existing approach to flood risk and focusing particularly on overcoming the issues at Grangemouth.

Council response: Support welcomed.

00646 Scottish Natural Heritage

Comments: 28

Vision

SNH support the preferred vision for Falkirk area. However they suggest minor amendments for emphasis so that an additional word 'accessible' is added to the vision statement and the word 'greenspaces' is also set in bold type.

Council response: Support welcomed. Suggested additions to vision statement are understood but have not been adopted to maintain clarity of themes and brevity.

Main Issues 1: Housing Growth

SNH agree with the medium growth proposed as the preferred option for housing growth, as this should reduce the overall magnitude of environmental impacts compared with the high-growth alternative option. SNH understand that some of the 'non-preferred' sites may have to be considered for allocation for the period 2024-34. One particular issue they see as being potentially problematic is the phasing of large scale allocations. Phasing of allocations, especially but not exclusively large-scale allocations, could increase the difficulties of making provision for infrastructure. Phasing of development can also create difficulties for securing mitigation for environmental impacts such as providing multifunctional green and blue infrastructure and networks.

Council response: Support welcomed. Comments on phasing and provision of environmental infrastructure noted.

Main Issue 2: Sustainable Housing Locations

SNH generally agree with the modest settlement expansion proposed for Bo'ness, which includes the 2 additional preferred new sites at East Muirhouses and Kinglass Farm (MUR/B/02 and BNS/B/01 respectively), albeit they have potential for significant negative landscape impacts, given their general settlement fringe locations. With regards to the Bo'ness Foreshore allocation, it is recommended that if the proposal has significantly changed since the previous appropriate assessment, then the assessment should be considered for refreshing, as part of the HRA process, particularly the 'in-combination' aspect.

Council response: The Proposed Plan continues to promote modest expansion in Bo'ness, although the proposals for Muirhouses have been dropped in favour of the identification of a small brownfield housing site at Union Street.

Main Issue 2: Sustainable Housing Locations

In general, SNH accept the preferred option for the Bonnybridge and Banknock area. Key natural heritage considerations include the enhancement and protection of a number of sites of importance for nature conservation within the area, including Bonnyfield Local Nature Reserve.

Council response: Comment noted. The Proposed Plan identifies a number of green network proposals in the area, including an expansion of the Bonnyfield Local Nature Reserve.

Authority Response to Contributions by Contributor for FLDP_MAINMain Issue 2: Sustainable Housing Locations

SNH agree with the preferred option for Denny. Important natural heritage issues within this area include establishing suitable buffer zones along the River Carron, as well as protecting and enhancing the local core path network, particularly to Chacefield Wood,

Council response: The Proposed Plan broadly confirms the scale of new proposals preferred in the MIR for Denny. A number of green network opportunities are identified, with a concentration on the River Carron Corridor.

Main Issue 2: Sustainable Housing Locations

SNH accept the preferred option for Falkirk. Opportunities should be taken to protect and enhance the landscape settings, green networks and biodiversity value associated with the sites near to the Forth and Clyde Canal and the River Carron.

Council response: The Proposed Plan continues to promote modest expansion in Falkirk, with new proposals identified at Cauldham Farm 2, Gowan Avenue, Westburn Avenue and Grangemouth Road. A number of green network opportunities are identified in the Proposed Plan, in South Falkirk and along the River Carron and Falkirk/Grangemouth Corridors.

Main Issue 2 : Sustainable Housing Locations

Given the constraints within Grangemouth, SNH agree with the preferred option of consolidation. Limited areas of greenspace within Grangemouth should be valued, protected and enhanced, wherever possible.

Council response: The Proposed Plan promotes consolidation in Grangemouth. Within the urban area open space will be protected through policy INF03 and the Helix provides the focus for green network opportunities.

Main Issue 2: Sustainable Housing Locations

SNH accept the preferred option of consolidation for Larbert/Stenhousemuir. The integrity of the landscape setting and of access/movement within the area should be maintained.

Council response: Supportive comment noted. There are no new housing proposals identified in Larbert/Stenhousemuir in the Proposed Plan.

Main Issue 2: Sustainable Housing Locations

In relation to the Polmont area, SNH accept the preferred option of modest settlement expansion mainly at Reddingmuirhead and at Maddiston. The likely requirement for an extension to the Kinneil Kerse sewage treatment plant, is noted. This would likely have a significant effect on the Firth of Forth SPA and therefore be subject to the HRA. It is a key issue to ensure that the integrity of the woodland strips and SINC resources in the area are sustained, which will enable greater connectivity with the wider green network.

Council response: The Proposed Plan continues to promote modest expansion in Polmont area, with new proposals identified in Maddiston and Polmont. A number of green network opportunities are identified in the Proposed Plan which aim to improve the integrity of the woodland strips and SINC resources in the area.

Main Issue 2: Sustainable Housing Locations

In relation to the Rural north area, SNH accept the preferred option of modest expansion at Airth. We note that any upgrade of the sewage treatment works is likely to require inclusion within the HRA.

Council response: The Proposed Plan identifies one new site in Rural North, at The Glebe in Airth.

Main Issue 2: Sustainable Housing Locations

SNH accept the preferred option for the Rural South area to reaffirm existing commitments with additional modest settlement expansion in the villages of Slamannan, Avonbridge and Shieldhill. The additional site at Slamannan (SLA/B/02) will need to be brought forward within the HRA due to its potential effects on the nearby Slamannan Plateau SPA, as well as the overall cumulative scale of housing growth within the village requiring assessment.

Council response: The Proposed Plan identifies new housing proposals in Avonbridge and Shieldhill, but the scale of proposals in Slamannan has been reduced.

Main Issue 4: Infrastructure for Growth

SNH welcome the acknowledgement that open space is a 'key aspect of community infrastructure' and will be taken forward within the Open Space Strategy. Networks of green space can provide routes for active travel and are often expressed as resources supporting 'green infrastructure'. Also green infrastructure, such as tree planting, open space and path networks, can support climate change measures through carbon sequestration and reduced energy use with non-motorised travel. Expansions to sewage treatment plants at Airth, Kinneil Kerse and Carriden and proposals for flood management at Grangemouth will need to be taken forward into the HRA.

Council response: Supportive comments noted.

Main issue 5: Green Belt

SNH support the preferred option to maintain the green belt. They accept the intention to remove a section of the green belt east of the A905 at Skinflats, as this area does not contribute to green belt objectives. Also accept that any significant adverse environmental effects of development with minor releases at Bo'ness and Laurieston can be addressed within site masterplans,

Council response: Support noted. In the Proposed Plan, two additional areas of green belt release have been included: a large area to the east of Bonnybridge for housing and recreation facilities; and a small area at Lochlands Industrial Estate for business use.

Main Issue 6: Countryside

SNH accept the preferred option to allow an additional range of specific relaxations to the policy on housing in the

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countryside and welcome the intention to produce Countryside Supplementary Guidance.

Council response: Support noted.

Main Issue 7: Employment Land

SNH welcome the recognition that certain elements of the local expression of the Central Scotland Green Network (CSGN) can contribute to enhancing tourism themes and networks. SNH note the intention not to continue with Kinneil Kerse site allocation (GRA/A/04), and agree with the intention to bring the allocations at Bo'ness and Grangemouth (BNS/A/10 and GRA/A/05-07), as well as Hillend Farm (SLA/A/06), Slamannan, into the HRA.

Council response: Comments noted.

Main Issue 8: Town Centres and Retail Provision

SNH welcome the intention to improve Falkirk Town Centre with an emphasis on promoting high quality design and place-making.

Council response: Support noted.

Main Issue 9: Strategic Access and Sustainable Travel

SNH welcome the recognition that promoting sustainable forms of transport will contribute to climate change and CSGN objectives, as well as health and place making agendas. Also note the intention to consider the path and cycle routes between Blackness and Grangemouth within the HRA.

Council response: Supportive comments noted.

Main Issue 10: Climate Change

SNH welcome the recognition that climate change, and sustainable development generally, is a cross cutting issue, as expressed in Figure 5.1 of the MIR. Also welcome the intended policy to reduce the use of carbon in buildings, along with decentralised energy systems.

Council response: Support welcomed.

Main Issue 10: Climate Change

SNH support the preferred option set out in the MIR in relation to renewable energy. SNH welcome the work to produce a spatial framework for wind energy developments that will address schemes of all sizes. SNH understand that this spatial framework will be set out in Supplementary Guidance. It is recommended that the SG provides clear guidance on the type of development (if any) that is likely to be acceptable within each LCU and includes clear design guidance to ensure that projects are of a suitable design-fit for that LCU.

Council response: Support welcomed. The Wind Energy Spatial Framework and Supplementary Guidance will set out guidance for wind energy developments within the Council area. It is intended that the guidance will safeguard sensitive areas, and direct development to more appropriate locations.

Main Issue 10: Climate Change

SNH welcome the preferred option to maintain and update existing policies and supplementary guidance on flood risk. In particular, they support the intention to continue to explore managed realignment opportunities along the Firth of Forth coastline. These proposals will need to be considered within the HRA.

Council response: Support welcomed. The environmental effects of the relevant policies are addressed within the SEA and accompanying Environmental Report.

Main Issue 11: Design Quality and Place Making

SNH support the preferred option to continue the current approach to design policy and guidance, and welcome the revised set of place-making priorities, which include the canal corridor and the CSGN.

Council response: Support noted.

Main Issue 12: The Green Network

SNH welcome the preferred option to define the CSGN in the area as a network of multi-functional green corridors. The LDP should continue to recognise these cross cutting values of green networks as it is further developed. The ER highlights the potential for Green Networks to have a likely significant effect on European Natura sites in the area. Therefore, Green Network proposals that could have a significant effect on those sites will need to be considered within the HRA. The potential of the Green Network to provide mitigation of in-combination residual impacts on Natura sites, should be recognised, e.g. Increased recreational pressure on sites, including the Firth of Forth, from increased residential development.

Council response: Comments noted. These issues have been dealt with in the Draft Habitats Regulations Appraisal of the Proposed Plan.

Main Issue 12: The Green Network

The quantity and quality of seminatural and natural habitats throughout the area should be protected and enhanced. SNH welcome the intention to include a policy to protect carbon-rich and rare soils.

Council response: Comments noted. Policy GN03 "Biodiversity and Geodiversity" of the Proposed Plan should help to safeguard the quality of seminatural and natural habitats. Policy RW04 "Agricultural Land, Carbon Rich and Rare Soils" provides protection for carbon rich and rare soil.

Main Issue 12: The Green Network

SNH support the intention to review current landscape character assessments to provide a more robust tool for assessing future proposals with landscape implications. Also commend the preferred option to prepare Supplementary Guidance on

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landscape where an emphasis will be placed on the value of all landscapes across the Council area.

Council response: Comment noted. Supplementary Guidance SG09 "Landscape Character and Assessment" will review current landscape character assessments to provide a more robust tool for assessing future proposals with landscape implications.

Main Issue 13: Cultural Heritage

SNH welcome the intention to introduce a policy that clarifies the circumstances in which enabling development for the restoration of historic buildings and structures would be permitted.

Council response: Support noted.

Main Issue 14: Waste & Minerals

SNH welcome the support of the objectives of the Zero Waste Plan. Any further extension to the Avondale landfill site will need to be considered within the HRA, due to the potential for downstream impacts on the Firth of Forth SPA. SNH suggest that the Opencast Coal Broad Areas of Search policy considers the value of wildlife sites and sites of importance for nature conservation, in terms of place-making, quality of life, ecosystem services, providing the basis for green networks and in helping to meet climate change objectives.

Council response: The comments are noted. It is recognised that the safeguarded site at Avondale would require a Habitat Regulations Appraisal. The opencast coal area of search policy acknowledges the requirement to assess the impact of any proposal on nature conservation interests.

Habitats Regulations Appraisal (HRA) Compliance Statement

SNH believe the Council's approach to HRA is generally sound and reflects past and ongoing work between Falkirk Council and SNH. It is ideal to use SEA as a means to identify potential effects on Natura 2000 sites. For the purpose of a transparent HRA record, it is important to ensure potential impacts on Natura sites identified in the SEA process are cross-referred, wherever possible, to 'likely significant effects' in the HRA. A range of detailed comments are provided for the next stages of HRA preparation, including guidance on which sites should be considered in the HRA process.

Council response: Comments noted.

Strategic Environmental Assessment Environmental Report (ER)

One of the many positive qualities of Falkirk's ER is that it identifies positive benefits as well as negative impacts from proposals in the MIR, and identifies how these can be taken forward in Falkirk's LDP. It is SNH's view that the ER provides a sound and realistic view of the range and extent of negative impacts and positive benefits from what is proposed in the MIR. A range of detailed comments are provided on the ER.

Council response: Comment noted. Responses to the range of comments submitted on the ER are detailed in Appendix 5 of the Revised Environmental Report.

00525 Scottish Power Renewables and Major Projects

Comments: 1

Main Issue 10: Climate Change

Scottish Power Renewables welcome the acknowledgement of the key role of renewable energy generation in mitigating climate change and recognition of Scottish Government targets. Section 5.3 of the MIR should include reference to the current UK and Scottish Government's renewable energy targets. SPR welcome the preferred option that the LDP will provide a supportive policy framework for renewables and the provision of guidance relating to onshore wind. The final plan should better reflect the aspiration of the SPP in promoting renewable energy in appropriate locations, where cumulative impact can be addressed. Any spatial framework should not be overly prescriptive and should not treat 'protected' or designated areas as no-go zones for wind energy development, particularly with regard to landscape designations.

Council response: In line with requirements set out by the Scottish Government in SPP, the Council is producing a Wind Energy Spatial Framework and Supplementary Planning Guidance which will set out guidance for wind energy developments within the Council area. It is intended that the guidance will safeguard more sensitive areas, and direct development to more appropriate locations. It is intended that the Spatial Framework and guidance will aid developers in assessing constraints. Direct reference to Scottish Government targets within the Proposed Plan has been avoided as targets may be subject to review.

00524 Scottish Resources Group

Comments: 1

Main Issue 14: Waste and Minerals

National policy continues to acknowledge the importance of coal within the UK "energy mix". Carbon capture will also play a role in ensuring the delivery of clean coal. The emerging LDP needs to continue to give clear guidance on future surface mining search areas. The existing search area while still having potential for surface coal extraction is affected by a depletion of reserves and environmental constraints which together make it unlikely that sites could come forward for development. While it is considered appropriate for landscape sensitivity and a strategic consideration of potential effects to be part of the assessment of areas of search it is not considered that this should result in the reduction of the area of search to such an extent that a workable scheme is unachievable. Two additional search areas are put forward in the interests of development certainty, to inform the public and stakeholders of potential areas of activity and to avoid the sterilisation of a national resource. The additional areas around Airth and to the north of Banknock (and north west of Longcroft/Parkfoot) are identified as having significant coal reserves which it is considered should be protected from sterilisation from any future development proposals. It is considered that coal could be worked in these areas within the life of the LDP. SPP advocates the reappraisal of areas of search and it is considered essential that these reflect locations where exploitation of the resource can be achieved. The proposed areas have similar characteristics to the existing area of search and it is considered that these areas should be identified in the LDP with site specific issues being dealt with through the planning application and EIA process.

Council response: The area of search for surface coal working has been extended slightly to the north west. This acknowledges that a further area is considered to have potential for development without a detrimental landscape impact. Other areas with an identified coal resource north of Banknock and around Airth are not considered to be appropriate locations for an area of search for surface coal working.

00466 **Scottish Water**

Comments: 4

Main Issue 4: Infrastructure for Growth

Scottish Water would prefer section 3.89 to read '...Capacity at several waste water treatment works is limited and will have to be augmented to accommodate growth'. Scottish Water is funded to provide upgrades at treatment works where the 5 growth criteria have been met and so limited capacity should not be seen as a barrier to development. Early conversations between Scottish Water and the developer are advised to allow maximum time for scheduling upgrades. Scottish Water's policy on infrastructure remains the same.

Council response: The Council acknowledges that Scottish Water has been funded to provide strategic capacity at water, and waste water, treatment works. However the lead in times to securing that investment serve as a barrier to development proceeding in the early part of the plan period, as exemplified in Torwood where provision of council housing on the allocated former school site has been postponed, pending investment by Scottish Water at Torwood WWTW. The conclusion that the consideration of areas with low WWTW capacity for new housing should be treated with caution is still valid. The revision of Technical Paper 4 has clarified paragraph 4.5.

Technical Report 4: Strategic Constraints

In relation to para 4.4 in Technical Report 4, insufficient capacity should not be seen as a barrier to development. Scottish Water acknowledges that in some areas the capacity at treatment works and within the existing network is insufficient to accommodate additional development without network reinforcement. Should there be insufficient capacity for development at water or waste water treatment works (Part 4 Assets), Scottish Water will provide additional domestic capacity if the Developer can meet SW's 5 development criteria. On receipt of these criteria, Scottish Water will instigate a growth project to provide additional Part 4 capacity for development. Scottish Water will also work with SEPA, the Developer and the Local Authority to identify solutions to enable development to proceed. In relation to para 4.5, the second last sentence in this paragraph is difficult to read and perhaps should be reworded as follows: 'Funding will be allocated to carry out work at treatment works to provide growth 'in line with local authority priorities, the criteria for this includes requirements for the site to be included in development plans and have secured planning consent'.

Council response: Technical Paper 4 acknowledges that Scottish Water has been funded to provide strategic capacity at water, and waste water, treatment works. However the lead in times to securing that investment serve as a barrier to development proceeding in the early part of the plan period, as exemplified in Torwood where provision of council housing has been postponed, pending investment by Scottish Water at Torwood WWTW. The conclusion that the consideration of areas with low WWTW capacity for new housing should be treated with caution is still valid.

Strategic Environmental Assessment Environmental Report

With regard to the WWTW adjacent to the Firth of Forth SPA, Scottish Water will work with SEPA, the Developer and the Local Authority to identify solutions to enable development to proceed. With regard to the statement 'Dalderse waste water treatment works should be expanded to accommodate the scale of proposed development, it should be noted that Dalderse would only require upgrade works if all of the proposed development came online. Currently, based on the available capacity at the WWTW and the expected build rate, a significant proportion of the proposed development would be able to proceed before there would be any concerns about the capacity. Scottish Water would be able to monitor the situation as applications were received and therefore we could highlight when capacity was becoming a concern. However, insufficient capacity should not be seen as a barrier to development. Scottish Water acknowledges that in some areas the capacity at our treatment works and within our existing network is insufficient to accommodate additional development without network reinforcement. Should there be insufficient capacity for development at our water or waste water treatment works (Part 4 Assets), Scottish Water will provide additional domestic capacity if the Developer can meet the 5 criteria.

Council response: Proposed Plan proposals INF 15-21 take account of discussions with Scottish Water on requirements to comply with Habitats Regulations regarding works adjacent to the Firth of Forth SPA.

Technical Report 1: Monitoring Statement

In relation to Technical Report 1, para 7.12-7.13 on Water and Drainage, limited capacity should not be seen as a barrier to development. Scottish Water acknowledges that in some areas the capacity at treatment works and within the existing network is insufficient to accommodate additional development without network reinforcement. Should there be insufficient capacity for development at water or waste water treatment works (Part 4 Assets), Scottish Water will provide additional domestic capacity if the developer can meet the 5 development criteria.

Council response: See previous comments in relation to constraints on consideration of housing growth in areas with limited WWTW capacity.

00532 **SEPA (East Region)**

Comments: 14

Main Issue 2: Sustainable Housing Locations

SEPA support the non preferred status of sites DEN/B/04, DEN/B/11 and DEN/B/13 as this is in accordance with their previous responses . It should be noted however that if these sites are altered to become preferred sites and allocated in the LDP there would be objection to them at the proposed plan stage due to flood risk at these sites. On committed sites SEPA recommend that sites DEN/A/01 and DEN/A/06 are removed from the plan due to their locations entirely within or partly within the functional flood plain identified by the Indicative River and Coastal Flood Map.

Council response: The Proposed Plan broadly confirms the range of new proposals preferred in the MIR for Denny, and one of the committed sites has been deallocated due to flood risk concerns.

Main Issue 2: Sustainable Housing Locations

SEPA do not support the preferred option to reaffirm commitment to the existing development at Mungal Farm and promote modest expansion to the site. Sites FAL/A/04, FAL/A/09, FAL/B/12 and FAL/B/13 should be removed due to their proximity to the West Carron landfill.

Council response: The Proposed Plan continues to promote modest expansion in Falkirk, with new proposals identified at Cauldhame Farm 2, Gowan Avenue, Westburn Avenue and Grangemouth Road. The other existing commitments in the vicinity of West Carron landfill, identified in the MIR and which remain unfinished, have been identified as housing proposals in the plan.

Main Issue 2: Sustainable Housing Locations

SEPA support the de-allocation of site GRA/A/04 as it is located entirely within the functional flood plain. As work towards the Proposed Plan is progressed, SEPA would recommend that the Council takes cognisance of the more detailed flood study for Grangemouth being undertaken for them by Halcrow Group.

Council response: The Proposed Plan confirms the deallocation of Kinneil Kerse as a business site. The LDP process will take account of the latest flood risk studies.

Main Issue 2: Sustainable Housing Locations

SEPA recommend that consideration is given to removing the committed sites AVN/A/01, AVN/A/02, AVN/A/03 and AVN/A/04 from the plan as the majority of the sites are located within the functional flood plain of the River Avon. Further comments regarding appropriate developer requirements relating to specific allocations are provided in Section 10 and Appendix 4 of SEPA's submission.

Council response: The sites listed in Avonbridge, except AVN/A/03, continue to be identified in the Proposed Plan as housing proposals. However the site comments highlight that the developable area will be restricted by the River Avon flood plain. The Council has given due regard to the other information on site requirements provided by SEPA.

Main Issue 4: Infrastructure for Growth

SEPA are currently working with SW to develop a Memorandum of Understanding (MoU) to link asset/network capacity to the environmental capacity of the receiving watercourses. This information will identify where drainage is constrained and where capacity exists. An annex provides advice on all sites with potential sewerage constraints. SEPA's response to the draft MIR on the need for a policy on waste water drainage requiring new development within or adjacent to the settlement boundary to connect to the public sewer, is still applicable. SEPA recommend that the existing policy ST12A In the light of continuing restrictions on public and private sector finances the moderate growth strategy of the LDP is considered prudent. Is updated/ carried forward. In terms of the preferred approach to infrastructure growth SEPA have previously recommended that this section considered the energy infrastructure requirements that will be needed to achieve greenhouse gas emission reduction targets.

Council response: Proposed Plan policy INF12 updates the current Local Plan policy on sewerage infrastructure.

Main Issue 5: Green Belt

SEPA support the preferred option to continue to keep the area of land in the corridor along the River Carron adjacent to the Mungal Farm development, as part of the green belt. This area of land provides a buffer between the landfill operations at West Carron and existing/proposed residential sites.

Council response: Support noted.

Main Issue 7: Employment Land

SEPA support the preferred option to provide additional flexibility in the permitted range of uses within employment land sites. This will assist potential developers identify appropriate locations for waste management facilities.

Council response: Comment noted

Main Issue 9: Strategic Access and Sustainable Travel

SEPA support the promotion of sustainable transport measures as part of the preferred option. Policy provision should be included in the LDP to ensure that new developments do not have an adverse impact on air quality either through the exacerbation of existing air quality problems or the introduction of new sources of pollution where they would impact on sensitive receptors. Links to DEFRA website that contains examples of such policies are provided.

Council response: Proposed Plan policy RW07 addresses air quality impacts arising from development proposals.

Main Issue 10: Climate Change

SEPA particularly welcome the inclusion of Figure 5.1 which demonstrates how climate change is integral to the entire MIR. SEPA welcome the commitment to developing a policy to encourage decentralised energy as part of the preferred option. As previously advised, SEPA recommend that Council identify sites or groups of sites in the plan or proposed supplementary guidance that may have scope for decentralised energy. Also recommend Council should undertake heat mapping exercise or identify areas of search and sites for other renewable and low carbon energy developments.

Council response: In line with requirements set out by the Scottish Government in SPP, the Council is producing a Wind Energy Spatial Framework and Supplementary Planning Guidance which will set out guidance for wind energy developments within the Council area.

It is not considered appropriate at this stage to spatially identify sites which have scope for decentralised energy. All proposals must demonstrate that potential green energy has been considered, and the new Low Carbon and Development policies within the Proposed Plan will form the appropriate mechanism for securing energy from renewable sources within new development.

Main Issue 10: Climate Change

SEPA support the preferred option to retain the existing renewable energy policy and expand it to cover all low carbon energy technologies. SEPA recommend that the links between renewable and low carbon energy, decentralisation of the network, maximising the re-use of surplus heat and waste management are drawn out in the next stage of the LDP process. Also recommended that the policy context for energy from waste is also covered by the renewable energy policy.

Council response: Comment noted. It is considered that Policy RW08 of the Proposed Plan and The Zero Waste Plan form the appropriate policy context for energy from waste schemes.

Main Issue 10: Climate Change

SEPA support the preferred option to maintain and update existing policies and supplementary guidance on flood risk and that the new policy will reflect the requirements under the Flood Risk Management (Scotland) Act 2009. SEPA have previously listed how the existing policy (ST12 Flooding) could be strengthened and recommend that these are included within the updated policy. SEPA require the new policy to also identify (and safeguarding) areas of land that contribute towards or has the potential to contribute towards sustainable flood management measures as part of the spatial strategy (on the proposal maps). SEPA recommend that Council refer to relevant policies of Orkney Islands Council as best practice. SEPA provide an annex where site specific flood risk advice is provided for use in deciding LDP allocations.

Council response: Comments noted. Opportunities may exist to promote natural flood management along a number of watercourses to help to reduce overall flood risk. This could include wetland restoration, riparian planning, flood plain creation and re-connecting modified watercourses to their natural flood plains. However, it is not considered prudent to promote these opportunities in an uncoordinated fashion as some natural flood management measures may actually have an adverse effect on the flood profile of a watercourse. Where resources allow, the Council will promote the study of the potential for natural flood management measures on a catchment by catchment basis and any measures identified will be promoted through the Local Flood Risk Management Plan and highlighted in subsequent versions of the LDP.

Policy RW06 (3) now states: "Where suitably robust evidence suggests that land contributes or has the potential to contribute towards sustainable flood management measures development will only be permitted where the land's sustainable flood management function can be safeguarded."

Main Issue 11: Design Quality and Place Making

SEPA support the preferred option to continue the current approach to design and policy guidance by carrying forward the existing policies. The existing policy EQ1 Sustainable Design Principles promotes the protection and enhancement of the environment and minimisation of waste as key principles. SEPA recommend the Council include a requirement for Site Waste Management Plans (SWMPs) in the future LDP policy. Also recommend other changes to Policy EQ1 e.g. Criterion 5 is updated to promote the avoidance (rather than mitigation) of flood risk as the most sustainable design principle; promote green infrastructure as a key design quality and place making principle; and incorporate air quality as a design consideration (c/f Stirling LDP SG on Placemaking)

Council response: Support and recommended changes noted. Policy RW09 (Waste Reduction in New Development) covers requirements for new development which could be included in a SWMP. Policy RW06 (Flooding) emphasises avoidance of development on flood plains. Provision of green infrastructure is emphasised in various places across the Proposed Plan. Air quality is covered by its own policy RW07.

Main Issue 12: The Green Network

SEPA support the preferred option to define the CSGN as a network of multifunctional green corridors. In respect of SEPA's interests, the associated multiple benefits that the green network can deliver are fundamental to the successful implementation of the River Basin Management Plans and sustainable flood risk management. Also SEPA particularly welcome the identification of green network components in Figure 5.3 that include opportunities for catchment flood risk management and improvements to the wider water environment. An annex is provided which sets out site specific advice on opportunities to protect the water environment.

Council response: Comments noted.

Main Issue 14: Waste & Minerals

SEPA support the preferred option to continue the existing policy on the location of waste management facilities and to continue to safeguard land for a potential extension to Avondale landfill site. SEPA confirm the existing local plan policies ST17 Landfill and ST18 Waste Management Facilities are in line with the objectives of the Zero Waste Plan (ZWP). In relation to policy ST18 (3) 'consider the need for the facility' it should be noted that Annex B of the ZWP sets out that 'need' is to be considered at a strategic level and that the capacities allocated in Table 1 of Annex B (of ZWP) should not be regarded as a limit to development within a particular local authority area. Existing waste management facilities should be safeguarded and identified on proposals maps. SEPA recommend wording for a policy in the LDP in support of this

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approach. An annex report is provided on sites with waste landuse co-location constraints. SEPA recommend that policy ST19 Waste Reduction in New Development is expanded to cover waste minimisation during operational as well as construction phases of new development of all kinds. SEPA also recommend that the LDP should clearly set out its support for the waste hierarchy which favours prevention over reuse, recycling, recovery then disposal.

Council response: Planning policy reflects the waste hierarchy preference for prevention, followed by reduction, reuse, recycling and energy recovery over waste disposal. The issue of need has been excluded from policy consideration and it is acknowledged that proposals should comply with the Zero Waste Plan capacity requirements. It is not considered appropriate for policy to seek to address waste minimisation during operational phases of development.

00580 **SEStrain**

Comments: 3

Main Issue 2: Sustainable Housing Locations

A main issue in new development is its sustainability in terms of transport, not only in its internal layout but also in terms of its location, in order to minimise the use of a car and maximise the use of public transport, cycling and walking. Although there are references to sustainability there is no indication how this was taken into account in defining the location of the proposed development sites. There are a considerable number of committed development sites where travel sustainability appears not to have been fully taken into account and will significantly increase reliance on a having access to a car e.G. Dunmore, Whitcross etc. These sites should be reassessed in light of new sustainability criteria and in comparison with newly identified sites.

Council response: Technical Report 2 provides a sustainability assessment of all new sites. The site at Dunmore House has not been identified as a housing proposal in the Proposed Plan.

Main Issue 9: Strategic Access and Sustainable Travel

SEStrain is currently involved in looking at the movement of freight in Central Scotland and encouraging greater use of Scottish ports. Grangemouth is a key port facility in Scotland. An important element in its potential growth is improved access to and from the port onto the strategic road and onto the rail networks. One related major project is the proposed new bridge across the Avon Gorge for access to the port from the south. Also good access for lorries from the port onto the M9 and improved rail access into the dock area are very important issues to be considered for the future growth of the docks. The development of well planned walking and cycling facilities will make a considerable contribution to the promotion of sustainable transport

Council response: Proposed Plan proposals INF01, INF02, INF03 and INF08 all support improved road and rail access to Grangemouth. Proposal INF07 makes specific provision for a new bridge and approach roads on the A801 at Avon Gorge. Policy INF07 provides for improvements to cycling and walking infrastructure.

Main Issue 14: Waste and Minerals

In the assessment of sites for minerals and waste, consideration should be given to reducing the movement of materials by road and the routes lorries will use, to reduce the environmental impact of these sites on the surrounding communities.

Council response: Proposals are required to address the potential impact on local amenity and the road network through both waste and mineral policies.

00437 **Shieldhill and California Community Council**

Comments: 6

Main Issue 2: Sustainable Housing Locations

508 standard letters from residents of Shieldhill objecting to the identification of any additional housing allocations in Shieldhill. The village has doubled in size over recent times, bearing a disproportionate amount of growth in Rural South, without commensurate improvement in infrastructure/services. Open space provision is poor. Housing development would reduce residential quality in terms of countryside landscape and access. The current recently adopted Local Plan opts for consolidation. This is the correct strategy as Shieldhill has reached capacity.

Council response: In addition to the existing site at Reddingmuirhead Road, one new housing proposal has been identified for Shieldhill in the Proposed Plan, at Hillcrest. The capacity would be 30 units, which represents a modest expansion to the village and will have limited impact on infrastructure and services. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

Main Issue 1: Housing Growth

508 standard letters from Shieldhill residents stating that, given the economic downturn, the medium growth scenario, and possibly even low growth, is too optimistic. The existing Local Plan provides enough housing land to meet housing requirements up to 2020.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections. The LDP is required to provide a generous supply of land by Scottish Planning Policy, taking account of household projections, and building in a sufficient level of flexibility.

Main Issue 12: The Green Network

508 standard letters from Shieldhill residents requesting that the countryside around Shieldhill be included in the South Falkirk Green Network in order to remedy lack of open space, protect the environment and prevent coalescence with neighbouring communities.

Council response: The countryside around Shieldhill is part of the Lower Braes component of the Green Network as identified in the spatial strategy of the Proposed Plan. In addition, Proposal GN16 encompasses potential landscape and habitat improvements adjacent to the Lower Bares villages, including Shieldhill.

Authority Response to Contributions by Contributor for FLDP_MAINMain Issue 1: Housing Growth

Given the economic downturn, the medium growth scenario, and possibly even low growth, is too optimistic. The existing Local Plan provides enough housing land to meet housing requirements up to 2020.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections. However, in accordance with Scottish Planning Policy, the Council is required to provide a generous supply of housing land, and to build a degree of flexibility into the supply. Some additional sites are required to meet requirements and to provide this flexibility.

Main Issue 2: Sustainable Housing Locations

Objections are raised to the identification of any additional housing allocations in Shieldhill. The village has doubled in size over recent times, bearing a disproportionate amount of growth in Rural South, without commensurate improvement in infrastructure/services. Open space provision is poor. Housing development would reduce residential quality in terms of countryside landscape and access. The current recently adopted Local Plan opts for consolidation. This is the correct strategy as Shieldhill has reached capacity.

Council response: One new site has been identified in the Proposed Plan for Shieldhill, at Hillcrest, with a capacity of 30 units. There is one existing site, that at Reddingmuirhead Road for 10 units. This is not considered an excessive level of growth in relation to the size of the village or its infrastructure capacity. There is spare capacity in the local primary school. Open space, or financial contributions, can be secured through the development.

SHIE/B Shieldhill Potential New Sites

The designation of the site at Hillcrest Farm, Shieldhill (SHIE/B/02) for housing is inappropriate as: previous planning applications for development have been refused; development of the site would lead to the coalescence of Shieldhill and Reddingmuirhead; and development of the site would lead to a loss of green belt and public access to countryside facilities.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

00800 Shields Roz

Comments: 2

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of the village and the local landscape character. Sites POL/B/02,03,13,15 & 17 are not supported. Local infrastructure (particularly transportation) will not be able to cope with the scale of development envisaged on all of these sites to the detriment of road safety and local amenity.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

Main Issue 5: Green Belt

The Council's preferred option to protect the integrity of the green belt is supported. Any recommendation to reduce the green belt would not be supported. Farm land, bridle paths & walkways are enjoyed for outdoor pursuits which include horse riding. Furthermore, a green belt expansion would be supported which would include the land around Sunnyside Road. Given the current financial climate, it is acknowledged that the Council are looking for options to increase their revenue stream but there must be a point when the Council needs to stop selling off rural land to developers and destroying the countryside.

Council response: Comment noted. In the Proposed Plan, two additional areas of green belt release have been included: a large area to the east of Bonnybridge for housing and recreation facilities; and a small area at Lochlands Industrial Estate for business use. The inclusion of land to the south of Brightons as green belt is not considered appropriate because it does not separate communities.

00810 Short Duncan

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of village to the detriment of the quality of life of existing residents. Sites POL/B/13 & 17 are not supported. Development will cause additional light pollution making it more difficult to stargaze.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00961 Silver Keith

Comments: 4

Vision

It is considered that the Preferred Vision is overly optimistic. The vision for the plan is an aspiration for growth; however, this has to be tempered in the current economic climate. The Preferred Vision is based on 2008 household projections covering a period of growth and does not take into account economic downturn and the impact that this has had on household completions. The focus for housing should be on firstly the regeneration of empty houses which would provide affordable housing, and are often located in more sustainable locations. Brownfield sites should be identified rather than new greenfield releases. Strengthening and enhancing existing communities should be preferential to settlement expansion. It is considered that the second alternative scenario, the 'Status Quo' vision is more appropriate for the area at this time.

Council response: The housing target for the Proposed Plan has been scaled back from that in the MIR in the light of revised household projections. There is a strong focus on the redevelopment of brownfield land, although a number of greenfield sites are included to ensure choice and flexibility in the supply. Scottish Planning Policy emphasises the need to provide a generous supply of land for housing.

Main Issue 1: Housing Growth

The Council should pursue a low growth scenario to ensure the sustainable development of the area, protecting communities and the environment. There would be no shortfall in the period 2014-2034 with this option. The housing requirement would be met in full by output from existing sites. The MIR states that that most of the housing requirement is covered by existing sites in the 2014-24 period (7,322 units from existing sites with a potential shortfall of 2,028 units) and that significant additional housing land may be required post 2024. Falkirk's second Main Issues Report would be better placed to cover this period. It would be inappropriate to add flexibility to the published figures given the optimistic household projections used. More definition needed of what defines 'flexibility allowance' is if it is progressed to the Proposed Plan.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections. However, in accordance with Scottish Planning Policy, the Council is required to provide a generous supply of housing land, and to build a degree of flexibility into the supply. Some additional sites are required to meet requirements and to provide this flexibility.

Main Issue 2: Sustainable Housing Locations

The preferred option for modest settlement expansion in the Rural South area is not supported. The Council should be adopting the alternative consolidation option which would consolidate the villages, relying only on existing commitments with no additional sites. Under this option SHIE/B/02 would no longer be required. The site does not integrate well with Shieldhill or Reddingmuirhead and cannot be viewed as a settlement expansion. It would also result in the erosion of Countryside and settlement coalescence. The comments highlight the constraints relating to accessibility, infrastructure etc set out in the Site Assessments Technical Report 2.

Council response: In addition to the other long-term sites identified in the Proposed Plan, a limited number of opportunities exist within Rural South. The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

Main Issue 4: Infrastructure for Growth

It is considered that local infrastructure is insufficient to support additional housing growth above and beyond that identified in existing sites in the Rural South housing market area. There are ongoing problems with gas supply disruption at Hillcrest, Shieldhill, and Belmont Avenue experiences similar issues. The existing onto B810 is hazardous. There will be also be increased congestion on the local road network and trunk roads to Falkirk by additional local development which is recognised in the MIR. There is concern over the loss of open space and green infrastructure. The Hillcrest and Belmont Avenue sites are currently used for recreation purposes by dog walkers, cyclists, and general walkers with the Burnside Farm and Greenwell Farms providing similar facilities for Shieldhill residents. There would also be loss of wildlife. The area has been recognised as having a deficiency of open space by the Open Space Strategy. It is proposed that the Hillcrest site could be utilised as a 'rural park'.

Council response: The Proposed Plan scales back the amount of new housing in the Polmont/Rural South area compared to the MIR in the light of infrastructure constraints. Proposed plan policy INF04 requires all new development to provide open space proportionate to its scale and taking account of the requirements of the Council's Open Space Strategy. Policy INF03 protects open space from inappropriate development. Proposals GN16 - GN19 support greenspace opportunities in the locality.

00787 **Simpson Sandy**

Comments: 5

Vision

Past and proposed policies do nothing to maintain or enhance Polmont's sense of identity or sense of place. Developments such as the distillery at Beancross and the mixed use site at Gilston will not maintain and enhance settlements' viability, identity and sense of place.

Questions the proposed growth strategies and their ability to accommodate sustainable growth and planned infrastructure.

Council response: Comment noted. Growth in the Polmont area has been scaled back in the Proposed Plan. Identified proposals provide opportunities for employment, new housing, infrastructure and environmental enhancement which can benefit the relevant communities.

Main Issue 1: Housing Growth

Disagrees with the claims of para 3.18 with regard to the distribution of housing. In the case of Polmont. Polmont has expanded, and is continuing to expand at a rate beyond that of other areas. There is little evidence of maximising the use of brownfield land and minimising the use of private car. New sites will also have an unsympathetic fit with existing settlements.

Council response: Housing completion statistics show that growth has been spread across the Council area. Polmont's level of growth over the past ten years, as a proportion of its population, has been comparable with most other major settlements in the area. It is accepted that, proportionately, there has been less development on brownfield land in Polmont than other areas. This reflects the lack of brownfield opportunities in the area. Polmont has generally good access to public transport, including a mainline railway station.

Main Issue 9: Strategic Access and Sustainable Travel

Developers should make new developments bus-friendly and reduce reliance of car based travel. Bus lanes on Callendar Road and Glasgow Road will not mitigate for roundabout bottlenecks at East Bridge Street and Mary Street. There are also delays caused by buses stopping at the Park and Ride at Three Bridges but the facility is seldom used. Concern that new residential development and new commercial development is not designed so as to accommodate 12.6 metre buses. Draft National Planning Policy Framework suggests key facilities should be within walking distance of homes at one mile. A walk of one mile is not a reasonable expectation of many people, particularly during winter months.

Council response: Proposed plan policy INF08 sets out the requirements for the layout of housing proposals to take account of bus travel. The maximum walking distance to bus stops of 400m is incorporated into the policy. The effect of traffic bottlenecks on bus travel is under constant review by transport planning colleagues. National planning policy is a matter for Scottish Government.

Main Issue 13: Cultural Heritage

Despite the fact that the Council has a suite of policies and guidance relating to the Antonine Wall, there have been recent developments in the Polmont area such as the Beancross distillery which would affect the Antonine Wall and additional development at Lathallan House which was a designed landscape. The Council requires more robust policies and there is serious concern about potential policies which would permit enabling development.

Council response: Comments noted. The policy on enabling development will be supplemented by guidance which will set down rigorous criteria for assessing proposals, rather than the ad-hoc approach as at present.

Main Issue 14: Waste and Minerals

Serious concerns about the ongoing management situation at West Carron Landfill site. Questions how waste dealt with by a private company such as Avondale Environmental Ltd can be counted as part of Falkirk Councils landfill provision as if it were a Council-owned facility when they take waste from other local authority areas. It would suggest that the Council's landfill provision does not extend beyond current contracts.

Council response: The comments on West Carron are noted. It is anticipated that there will be a gradual reduction in waste going to landfill in line with the Zero Waste Plan and this will be reflected in its annually updated landfill capacity requirements for a rolling 10 year period which are part of the national capacity requirement. The 2 main sites in the Forth Valley area are at West Carron and Avondale and existing landfill capacity currently exceeds the Zero Waste Plan capacity requirements.

00809 **Smith Alistair**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of the village. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure (particularly the local road network and the local primary school) will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00145 **Smith Phillip C**

Comments: 5

Main Issue 1: Housing Growth

Agree with Council's preferred strategy of medium growth at 725 units per annum. The balanced preference is a suitable approach especially in the current economic climate and assuming there are a number of established sites yet to start.

Council response: Support welcomed. The housing target has been reduced to 675 from the MIR figure of 725 in the light of updated household projections.

Main Issue 2: Sustainable Housing Locations

The additional 350 houses for Denny is generally adequate from the main land supply sites and locations. However this should not preclude smaller sites from coming forward for reasons of housing choice. Some larger sites will take time to establish and are longer term.

Council response: The Proposed Plan provides for a mix of large and small sites to meet the Denny settlement additional housing requirement of 408 homes by 2024. The development of suitable windfall sites on land within the urban limit under policy HSG03 can provide further housing choice.

Main Issue 5: Green Belt

Support is given for the general area of green belt between Denny, Dennyloanhead and Bonnybridge but the small area at Drove Loan make no contribution to the 20 year vision. The small site at Drove Loan should be deleted from the green belt. This view was supported by the PLI Reporter in that inclusion of the larger site previously promoted would not lead to coalescence.

Council response: The area in question contributes to the function of the green belt in this location. The existing boundary is robust and logical, and the site does not represent an appropriate green belt release.

DEN/B Denny Potential New Sites

Philip Smith seeks part of site at Drove Loan, Denny (DEN/B/06) to be zoned for housing, i.e. Considered as a preferred site. The area in question is only 0.75 ha of the whole 2ha site, located at its western end, with a notional capacity of 25 units. The reduction in site size takes account of the LPI Reporter's comments on visual prominence and it is disappointing the revised site as submitted at Issues and Sites Questionnaire stage was not taken forward to MIR. The site would form a natural continuation of the existing housing set in a backdrop of woodland when viewed from the wider green belt. The site is effective in terms of criteria used in PAN2/2010.

Council response: The site at Drove Loan (DEN/B/06) has not been identified as a housing proposal in the Proposed Plan. The site occupies prime agricultural land, although it currently forms a scrub landscape adjacent to Chacefield Wood, providing habitat for wildlife. The site has relatively low accessibility to services and community infrastructure. The site lies in the Denny-Bonnybridge green belt and its development would impact on the green belt's function to separate Denny and Bonnybridge, notwithstanding the site area has been reduced since its status was considered at the Falkirk Council Local Plan Inquiry.

POL/B Polmont Potential New Sites

Mr Smith seeks the allocation of a site at Polmonthill for the purposes of recreational/tourism uses including a campsite and ancillary facilities, a potential fishing school, cafe and office. The development is considered compatible with the aims of the Green Network and the nearby SSSI. It is considered that along with adjacent recreational facilities that the area could potentially form a tourism node. They would also be content for the site to remain within the green belt.

Council response: The site POL/B/20 at Polmonthill is not identified as a proposal in the Proposed Plan. The site lies within the Green Belt, and adjacent to the Avon Gorge SSSI. It is partly brownfield, and well-related to the green network. The site may well have potential for tourism-related development, in conjunction with Green Network improvements, but it is considered that any such proposals are best considered on their merits against the relevant countryside policies, rather than through allocation in the plan.

01000 **Smith Violet**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00987 **Spence James M**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station useage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00330 **SportScotland**

Comments: 8

Main Issue 5: Green Belt

No reference is made in the text to the role of the green belt in providing for outdoor sport and recreation. It is important for green belt policy to align with the advice in the SPP on Green Belts. Paragraph 164 (of the SPP) states that an effectively managed green belt can be an important resource for access to the countryside, providing a range of opportunities for outdoor recreation. Paragraph 159 of the SPP is clear that a main purpose of the green belt is to protect and give access to open space. It is important that this purpose is fully reflected in green belt policy in the proposed plan. To this end there is concern in relation to the proposal to remove a large area of green belt around Skinflats. This could impact significantly on opportunities locally for access and recreation. If this area is to be removed as green belt, the Council is urged to fully assess the potential impact on outdoor sport and recreation interests, including impacts on access to and from the Firth of Forth, to protect and retain important sites and routes identified, and to identify opportunities for developers to provide for outdoor sport and recreation proposals. In assessing the potential impact on outdoor sport and recreation interests it will be essential to consult with these interests, helping identify what impacts may be, how to mitigate against these, and what opportunities there may be for enhanced provision in the future.

Council response: Policy CG02 on Green Belt in the Proposed Plan makes explicit reference to the green belt's role in protecting and giving access to greenspace for recreation.

Main Issue 9: Strategic Access and Sustainable Travel

Sportscotland fully support the proposals to support walking and cycling and active travel in paragraph 4.54. In taking this forward it is crucial to understand the relationship between functional walking and cycling and that done for recreational

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purposes, each reinforcing and overlapping with the other. It is important not to develop active travel in isolation from recreational walking and cycling and to aim to develop an integrated network that joins recreational and commuting routes up. It is important to realise that provision for functional cycling or walking is in most cases also provision for recreational cycling and walking (and vice versa) and that both sorts of provision should consider the needs of both types of users.

Council response: The Council area already has an extensive network of walking and cycling paths which join up local and national routes. Proposed Plan policy INF07 provides for further improvements to cycling and walking infrastructure and the promotion of the core path network. There are 32 opportunities identified in the Proposed Plan for green network improvements, many of which have an active travel component.

Main Issue 10: Climate Change

In relation to the preferred approach outlined, and the reference to setting out guidance on constraints, it is important that the potential impact of renewables on outdoor sport and recreation interests is taken into account. Paragraph 187 of the SPP is clear that impacts on recreation interests should be taken into account. Paragraph 190 identifies recreation interests as a potential constraint on wind farm development. We would look for this to be reflected in any detailed policy or SPG criteria which are developed.

Council response: Comments noted. In line with requirements set out by the Scottish Government in SPP, the Council is producing a Wind Energy Spatial Framework and Supplementary Planning Guidance which will set out guidance for wind energy developments within the Council area. It is intended that the guidance will safeguard more sensitive areas, and direct development to more appropriate locations. It is intended that the Spatial Framework and guidance will aid developers in assessing constraints.

Main Issue 11: Design Quality and Place Making

Sportscotland are fully supportive of the Council's intention to update its design policy and guidance to align new development with Designing Places and Designing Streets. Both these pieces of advice put walking and cycling as a priority. New development should provide for new walking and cycling infrastructure and should link to both functional and recreational networks that already exist. Multi use should form the starting point providing shared use for walking and cycling.

Council response: Comments noted. Policies in the Proposed Plan require the provision of new walking and cycling infrastructure, as appropriate, in new development.

Main Issue 12: Green Network

Sportscotland are strongly supportive of the preferred option and of the network shown on Map 5.1. The extension of routes into the rural hinterland is particularly supported. In developing and protecting the network it is crucial to understand and promote its role in providing for sport and recreation and to ensure that important sites for outdoor sport and recreation in the countryside are protected from and provided for through development. In relation to the green network it is crucial that policy on access rights aligns with the advice of paragraph 150 of the SPP, that planning authorities should protect core paths and other important routes and access rights. It is important therefore for policy to be willing to refuse development that will have a significant impact on important and popular access routes, that cannot be satisfactorily mitigated against. It will be important to protect core paths and other important routes (so not just core paths) and to appreciate that routes does not just mean paths but could extend to e.G. Access on water, climbing routes or launching sites for air sports. In terms of the wider greenspace resource Sportscotland would like to see policy protection for country parks in Falkirk. Paragraph 150 of the SPP is clear that planning authorities should be mindful of the statutory purpose of country parks in making planning decisions which affect them. The statutory purpose of country parks is to provide opportunities to the public for enjoyment of the countryside.

Council response: Comments noted.

Riparian access rights will be protected by policy RW05 "The Water Environment" of the Proposed Plan
Core paths and other important routes will be protected by policy GN05 "Outdoor Access" of the Proposed Plan

The Council's only Country Park at Muiravonside has been identified in the Proposed Plan as a distinct green network opportunity (GN27) for enhanced visitor attractions, recreational facilities and woodland management. Any proposal which conflicted with these aims would be resisted.

Main Issue 12: Green Network

Landscape policy should align with the advice in paragraph 140 of the SPP that planning authorities should consolidate existing landscape designations into a new Local Landscape Areas (LLA) designation. In implementing Falkirk's preferred approach it is important that LLA are reflected in the proposed supplementary guidance. Sportscotland is fully supportive of the LLA designation given its role in safeguarding and promoting important settings for outdoor recreation and look for designation and policy to be made reflective of this purpose. In protecting landscape for sport and recreation purposes it is important to protect the aesthetic qualities which sport benefits from but it is also important to protect the physical qualities of the landscape that sport benefits from. This would include, for example, physical attributes such as gradient, rock formation, vegetation cover, water presence and characteristics etc. Sportscotland would insist on a policy for the protection of recreational open space and playing fields which reflects the wording of paragraph 156 of the SPP.

Council response: Comments noted. Policy GN02 "Landscape" protects Local Landscape Areas which in the Falkirk Council area are called Areas of Great Landscape Value. Policy INF03 "Protection of Open Space" protects recreational open space and playing fields.

Appendix 2: Proposed Supplementary Planning Guidance

Sportscotland are currently working in partnership with the Falkirk Community Trust to produce a sports pitch strategy which will provide an assessment of pitch provision for football and other pitch sports in the Falkirk Council area and an

assessment of the current and future demand for educational, sports development, formal match play and training use. The strategy will consider the Sports development needs of the local authority area and provide recommendations how to meet the existing and future needs through the provision of pitches and associated changing facilities. The supplementary guidance for open space should consider the recommendations of the pitch strategy once completed with developer contributions being guided by recommendations where appropriate.

Council response: Comments noted.

MUR/B Muirhouses Potential New Sites

This site at East Muirhouses 1(MUR/B/01) currently contains playing fields, is proposed for housing and would need to be assessed against the SPP. SportsScotland would be minded to object to a forthcoming planning application for housing on this site if the criteria of paragraph 156 are not met. The Pitch Strategy currently being developed will provide the necessary analysis to consider the consequences of a proposed housing site in this location and the necessary compensation requirements.

Council response: The site in question does not impinge on the adjacent playing fields. It has not, in any case, been identified as a housing proposal in the Proposed Plan.

00869 **Steel George**

Comments: 3

Main Issue 2: Sustainable Housing Locations

Falkirk should have a higher level of housing allocations in relation to other settlements given its status as the sub-regional centre and as a concentration of services and facilities. Whilst medium growth is supported, there is concern as to the delivery of the SIRRs in particular.

Council response: Comment noted. The housing allocation for Falkirk has been increased and is the highest of all the settlement areas, reflecting its size and importance within the network of communities. The effectiveness and phasing of the SIRRs has been reviewed. Bo'ness Foreshore and Slamannan in particular have been deferred to post 2024.

FAL/B Falkirk Potential New Sites

The identification of Mungal/Cauldhame Farm 3 is supported. However, consideration should be given to increasing its capacity to 200-250, if it can be proven that this scale of development can be accommodated within the site.

Council response: Support noted. The indicative capacity of the site in the Proposed Plan has been increased to 200 following the submission and assessment of additional information. Actual capacity will be dependednt on the outcome of detailed masterplanning.

FAL/B Falkirk Potential New Sites

The Mungal/Cauldhame Farm 4 site relates better to the urban area than the green belt, and does not fulfill the purpose of the green belt. Further consideration should be given to this site including exploration of appropriate uses which may include leisure and recreation or agricultural diversification. The role that the land may have in supporting the Green Network is acknowledged but this can still be achieved with some sensitive development in accordance with countryside policy.

Council response: The site has not been identified as a development proposal in the Proposed Plan. It is considered to form a legitimate part of the green belt, providing a buffer between the cemetery and future development. It is elevated and development would have landscape impacts. Green network enhancement (planting, access etc) in association with the adjacent allocated site could be appropriate.

00999 **Stewart Lynda**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00875 **Sutherland Isla**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of the village and local landscape character. Sites POL/B/2,3,13,15 & 17 are not supported. Local infrastructure (particularly schools, transportation and healthcare) will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00861 **Sweeney Sylvia**

Comments: 5

Vision

The vision is considered to be over-optimistic and based on trends during growth period. Housing requirements are likely to reduce during the Plan period. The focus for housing should be on the regeneration of empty homes and brownfield sites which represents a more sustainable form of development and which would strengthen existing communities. Preference is for the second alternative vision to retain the 'status quo'.

Council response: The housing target for the Proposed Plan has been scaled back from that in the MIR in the light of revised household projections. There is a strong focus on the redevelopment of brownfield land, although a number of greenfield sites are included to ensure choice and flexibility in the supply. SPP emphasises the need to provide a generous supply of land for housing.

Main Issue 1: Housing Growth

Consider the preferred option of medium growth to be too optimistic and that consolidation and a low growth scenario should be pursued, focusing on regeneration and developing existing identified sites. . Most of the housing requirement to 2024 could be met from existing allocations through the 'low growth' option. There is a need to define and justify 'flexibility allowance', which in any case is considered inappropriate given the optimistic household projections. The flexibility allowance is unquantified and too high, and this together with the absence of windfall and small sites in the housing calculations, means the Plan is at risk of over-supplying housing land to the detriment of regeneration, sustainable housing locations and the consolidation of existing communities.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections. However, in accordance with Scottish Planning Policy, the Council is required to provide a generous supply of housing land, and to build a degree of flexibility into the supply. Some additional sites are required to meet requirements and to provide this flexibility.

Main Issue 2: Sustainable Housing Locations

The option for modest settlement expansion in the Rural South is not supported and a strategy of consolidation should be adopted, relying on existing allocations.

Council response: The amount of additional land allocated for housing in the Rural South through the Proposed Plan (over and above existing committed sites) is only 70 units, which is not considered excessive.

Main Issue 4: Infrastructure for Growth

Local infrastructure is insufficient to support growth beyond existing housing allocations in Rural South.

Council response: The Proposed Plan scales back the amount of new housing in the Rural South area compared to the MIR in the light of infrastructure and economic constraints.

SHIE/B Shieldhill Potential New Sites

The site at Hillcrest Farm, Shieldhill (SHIE/B/02) should not be allocated for development. Proposals for housing development have been the subject of refusals of planning consent, the existing development at Hillcrest was on a brownfield site, and development of the site would erode the countryside and lead to settlement coalescence. The site assessment in Technical Report 2 identifies a number of infrastructure limitations. In addition there are frequent gas supply reductions to Hillcrest Square, the road network is insufficient, there would be loss of open, recreational space and loss of valuable wildlife habitat, loss of village identity and exposure of housing to high winds. In particular, Braes High School has almost reached capacity. The potential adverse on ecology is also noted in the Environment Report and Habitats Regulation Appraisal. Objection is also made to any additional housing in Shieldhill including sites SHIE/B/01, SHIE/B/03 and SHIE/B/04.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

00838 **Tait Brian**

Comments: 2

Main Issue 6: Countryside

Current Scottish Government policy at paragraph 94 of the SPP requires development plans to support more opportunities for small scale housing development in all rural areas. Consistent with the SPP, it would be appropriate for policy in the forthcoming plan to indicate the circumstances in which extensions to existing clusters and groups might be supported. Policy might consider the degree of containment required in terms of surrounding roads and existing development and/or landscape features and the benefits which might be taken into account as factors supporting housing cluster extensions (for example where additional housing would result in improved access to existing development).

Council response: The policies in the proposed Plan allow for infill development and redevelopment of steadings. Detailed guidance on this, including what constitutes infill and the extent of additional housing allowed as part of steading conversions, will be provided in Supplementary Guidance.

RUR/B Rural Area Potential New Sites

It is requested that continued consideration is given to the allocation of the site at East Cottage, California (RUR/B/09) for housing development.

Council response: The site has not been identified for development in the Proposed Plan. The site lies in the open countryside, well beyond the village limit of California. Its relatively remote and isolated location in the open countryside is not a sustainable one in terms of transport and access to existing infrastructure and services. The strategy for the Rural South area is to focus development on the existing villages.

00899 **Taylor John**

Comments: 1

Main Issue 4: Infrastructure for Growth

Concern is expressed about the destruction caused at the Earlsgate playing fields in Grangemouth. The Local Plan (para 11.41) states that: "Any development of the following phases must respect the mature trees within the grounds and address the issue of replacing any sports pitches lost, either by alternative locations or a financial contribution to ensure the improvement of existing facilities." This has been ignored and references in the MIR to community and sports facilities being well provided for are not supported. At the Earlsgate site there has been no respect to the mature trees and replacement of the sports pitches has not been addressed by alternative locations or a financial contribution. The all-weather pitches installed at the Falkirk schools are of inferior quality and sport is only referenced once in the whole of the MIR. The Council has not adequately considered sporting facilities in the proposed local plan, and the MIR is overly skewed towards transport infrastructure.

Council response: Comment on planning application decision at Earlsgate noted. The promotion of sport is not primarily a role for a development plan. Nevertheless proposed plan policy INF04 requires all new development to provide open space proportionate to its scale and taking account of the requirements of the Council's Open Space Strategy. Policy INF03 protects open space, including sports pitches, from inappropriate development. The Council is preparing a Sports Pitch Strategy complementary to the LDP process. The Proposed Plan promotes 32 opportunities to improve green infrastructure across the Council area.

01012 **Telford & W M Telford Yvonne**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01035 **Templeton Wendy**

Comments: 1

Main Issue 2: Sustainable Housing Locations

The future development of Slamannan village is essential to ensure the long term sustainability of the village. Provision of new affordable housing is essential to ensure that future generations are not forced out of rural life. It is hoped that the increase in population as a result of regeneration will lead to the provision of better village facilities.

Council response: Comment noted. The Proposed Plan continues to promote housing-led regeneration. However, a more realistic view has been taken of the likely scale of housing growth which the village may be able to support, and the timescale over which this is likely to occur.

00509 **Tesco Stores Ltd**

Comments: 3

Main Issue 8: Town Centres and Retail Provision

It is accepted that it is important to support the town centre and explore opportunities for its improvement. However, opportunities such as the East End may not be viable for some years. Aspirations for redevelopment can often lead to damaging blight in an area if there is little likelihood of the redevelopment taking place in the short to medium term. Accordingly, the LDP must recognise that although, in time, it would be desirable to deliver all the 'Key Opportunities' listed in Figure 4.3, in the meantime every effort should be made to maintain vibrancy and vitality in the town centre by making good use of existing retail and service floorspace and encouraging new operators to occupy vacant units.

Council response: Comments noted.

Main Issue 8: Town Centres and Retail Provision

Camelon should have its status in the network of centres upgraded to a District Centre, given its history, the recent Tesco development, and further redevelopment opportunities which exist.

Council response: Camelon does not merit District Centre status given the size of its catchment and its role in relation to the the catchment. The boundary of the centre has nonetheless been expanded westwards in recognition of recent development.

Main Issue 7: Employment land

Given that there is already a broad mix of uses along the Glasgow Road corridor in Falkirk, with recognised potential for a further diversification of the mix of land uses, the designation of this area as a Core Business Area is inappropriate and misleading. In particular, it is not appropriate to designate the Glasgow Road 1 and 2 sites as part of any Core Business Area. They should be regarded as part of the mix of retail, leisure and other commercial and community uses which make up the Camelon Centre.

Council response: The designation of the Glasgow Road Industrial Area has been changed to an Area with Potential for Redevelopment in the Proposed Plan. It has also been included within the boundary of the Camelon Local Centre. This affords maximum flexibility for any future redevelopment of the area.

00065 The Church of Scotland General Trustees

Comments: 2

AIR/B Airth Potential New Sites

Church of Scotland Trustees support the identification of site at the Glebe, Airth (AIR/B/03) as a preferred new housing site with an indicative housing capacity of 30 units. However they consider that there is further development potential in this location to meet the growth requirements of Airth.

Council response: The Glebe site in Airth has been identified as a housing proposal of 40 units in the Proposed Plan. The site would represent the northward extension of the village along the A905, matching the extension planned by the existing commitment across the A905. School capacity constraints are still significant in Airth, in terms of both Airth PS and Larbert HS, but it is considered that this small site could be accommodated without major additional impact, and is preferred to the alternative of growth at the southern end of the village. Structure planting could mitigate any visual impacts from the northern approaches to the village. The site avoids development of the functional flood plain and has reasonable accessibility to most local transport and community infrastructure.

AIR/B Airth Potential New Sites

The allocation and development of a larger site at the Glebe to the north of Airth will provide a fourth, and preferable alternative for growth in Airth. This would allow for a greater level of expansion than currently proposed but not of a major scale and one that would still be appropriate to the existing scale and character of the village. The proposed site would also offer a logical defensible boundary to the north of the village.

Council response: The Proposed Plan increases the indicative capacity of the site to 40 units compared to the MIR, but does not extend its area further of the eastern side of the A905.

00213 The Coal Authority

Comments: 2

Main Issue 14: Waste and Minerals

The Falkirk area contains coal resources capable of extraction by surface mining operations and fossil fuels are expected to continue to play an important role in the generation of electricity with clean coal delivered by carbon capture and storage. Coal should not be sterilised by development and prior extraction of coal should be undertaken. There will continue to be a demand for indigenous coal in the lifetime of the LDP. The LDP should therefore safeguard surface coal across the plan area, include policies to support the extraction of coal before development to avoid sterilisation, include policies for energy mineral proposals generally, include policies in relation to deep bed extraction of coal bed methane (CBM) or abandoned mine methane (AMM), site allocations for strategic proposals and policies for appropriate restoration and aftercare. Safeguarding of the coal resource across the area is necessary to comply with national policy and the Surface Coal Resource Plan should form the evidence base for this. Any approach considered to be more restrictive than national policy would not be supported. The extraction of coal prior to development has been viable down to 0.04ha sites and in areas such as Falkirk with a history of coal mining this method of extraction prior to development can prove to be the most efficient and economically viable means of addressing any potential land instability problems.

Council response: Comments noted. The plan contains policies in support of the extraction of coal and on shore gas where it is environmentally acceptable and for the restoration of sites following development.

Main Issue 14: Waste and Minerals

The area has a coal mining legacy which should be acknowledged through the LDP with 1630 recorded mine entries and 46 coal mining related hazards reported in the Falkirk area. The LDP should include a reference to the range of public safety issues associated with historical coal mining and appropriate policies requiring new development to take account of these risks including mitigation where required. In identifying new sites through the LDP the GIS data identifying coal referral areas should be used to highlight any coal mining issues. The Coal Authority would not however wish to see sites excluded on this basis as development can be an opportunity to resolve historical mining issues. A number of the settlements identified for growth have a legacy of past mining activity that could present risks to land stability.

Council response: Comments noted. The minerals section acknowledges the mineral resource in the Council area although it does not identify it as a constraint to other development. Most of the Council area is a coal referral area or standing advice area and it is therefore inevitable that some sites will have to take historic coal mining issues into account in their development.

00872 The Confederation Of UK Coal Producers

Comments: 1

A Sustainable Place

CoalPro supports the retention of the Slamannan Plateau as a broad area of search for opencast coal. However, there has been limited interest in this area in recent years. CoalPro therefore supports the alternative to the preferred option, i.e. that the opencast coal broad area of search be widened.

Council response: The area of search for surface coal working has been extended slightly to the north west. This acknowledges that a further area is considered to have potential for development without a detrimental landscape impact. Other areas with an identified coal resource north of Banknock and around Airth are not considered to be appropriate locations for an area of search for surface coal working.

00165 The Link Group Ltd

Comments: 2

Appendix 2: Proposed Supplementary Planning Guidance

Concern is raised in relation to the enhanced status being sought in relation to Education and New Housing Developments SPG. The detailed wording of the SPG should therefore be the subject of public consultation and scrutiny as part of the LDP process before any additional weight is attached to it as being part of the LDP. It should not be the case that there is an automatic elevation to LDP status because the SPG has been previously used by the council.

Council response: The conversion of SPG Education and New Housing Development to SG will be subject to public consultation in the period following publication of the Proposed Plan.

B&B/A Bonnybridge and Banknock Committed Sites

The site at Auchincloch Drive, Banknock (B&B/A/09) has planning permission for the erection of 30 units so the site capacity shown in Appendix 1 should reflect this.

Council response: As construction of new housing at Auchincloch Drive is expected to be completed before the end of 2014, the site has not been identified as an opportunity for housing growth in the Proposed Plan.

00850 The Mariner Group

Comments: 1

GRA/B Grangemouth Potential New Sites

This site at Little Kerse, Grangemouth (GRA/B/05) was formerly used a social and recreational club for BP employees and continues to be used as a sports facility with all weather and grass public pitches. A masterplan has been developed illustrating the proposals for the site including a sports pavillion, hotel, outdoor play facility, nursery and walking and jogging track. The site is allocated as green belt however this does not take into account the brownfield parts of the site such as the area where the Social Club stood and hard surfaced areas. The site does not make a positive contibution to the Green Belt and its redevelopment would achieve a suitable edge along Wholeflats Road. New buildings would only be located where former buildings were sited and the existing pitches would be retained. The proposal requires a countryside location given the need for a large area of flat land and its low level impacts mean that green belt objectives should not be hampered. The continuation of the current use on the site requires to be recognised through the plan as acceptable to green belt and countryside policies. The facility supports a healthy population and supports the local economy. Grangemouth continues to be constrained however this site could be a centre for excellence for sport. The appendices show the site as a recreation ground and it is considered that it should be shown as an opportunity/allocation for leisure/sport and recreational uses with additional ancillary uses.

Council response: The site at Little Kerse remains a logical and legitimate part of the green belt, contributing to the separation of Grangemouth and Polmont. The Proposed Plan has acknowledged that there is potential for expansion of recreational facilities at Little Kerse, which could be compatible with green belt objectives.

00702 The Profili Partnership

Comments: 9

Main Issue 1: Housing Growth

There is concern as to whether the preferred sites identified can deliver the medium growth option, especially as there are questions about the deliverability of the SRRs in the first 10 year period. These may have to be deferred to the second 10 year period. Commitments need to be re-examined, and a more flexible approach taken. This could include the identification of a reserve list of 'non-preferred' sites. Green belt should be reviewed with a view to identifying 'white land'. More emphasis is needed on the role of housebuilding to the local economy.

Council response: The phasing and effectiveness of the existing supply has been reviewed, and a considerable amount of housing, including the former SRRs at Bo'ness Foreshore and Slamannan, has been discounted from the 2014-2024 period. There remains sufficient flexibility within the supply to provide for meeting the revised housing target. A green belt review was undertaken as part of the MIR, and green belt housing release undertaken in Bo'ness and Bonnybridge.

Main Issue 2: Sustainable Housing Locations

Falkirk should have a higher level of housing allocations in relation to other settlements given its status as the sub-regional centre and as a concentration of services and facilities. Greater emphasis should also be placed on the the role of high quality affordable housing in attracting employers to Falkirk.

Council response: Comment noted. The housing allocation for Falkirk has been increased and is the highest of all the settlement areas, reflecting its size and importance within the network of communities.

Main Issue 3: Housing Need

The provision of affordable housing as a proportion of a development site needs to take account of the availability of funding to allow delivery. While the affordable housing requirement may be contained in a Section 75 agreement with the developer, a fallback position is needed if the funding is not available within a certain timescale, e.G. Delivery of unsubsidised housing.

Council response: The SG on Affordable Housing will set out a flexible approach to provision which takes account of funding variability.

Main Issue 4: Infrastructure for Growth

The preferred option for infrastructure is supported. However any developer contributions to infrastructure must be fair, proportionate and reasonable. They should be identified at the proposed LDP stage in the form of statutory Supplementary Guidance (as identified in Appendix 2 of MIR) that allows a full debate and consultation through the plan process. This will also allow developers and landowners to be aware and plan for a level of developer contributions when negotiating land purchase contracts etc.

Council response: Supportive comment noted. Proposed Plan policy INF02 and related SG concerned with developer contributions highlight the need for S75s to comply with the provisions of Circular 3/2012. Requirements for developer contributions are set out for all relevant proposals in the Site Schedule of the Proposed Plan.

Main Issue 5: Green Belt

The green belt requires further examination with a view to identifying more 'white land' on the edge of settlements, e.G. Mungal/Cauldhame Farm 4.

Council response: A green belt review has been undertaken, and areas identified for release identified where appropriate. The area referred to at Mungal/Cauldhame Farm contributes to the function of the green belt in the vicinity, and so has been retained as green belt in the Proposed Plan.

Main issue 6: Countryside

The intention to prepare SG on development in the countryside is noted. Attention is drawn to Stirling Council's guidance on this topic, which outlines criteria for the reuse of redundant brownfield sites. Development in the countryside allows scope for sustainable design which can offset additional car use.

Council response: Comment noted.

Main issue 10: Climate Change

The required percentage carbon reduction in new buildings should be set or driven by Building Standards and should be further encouraged by planning policy through encouraging good layout and design. There has to be uniformity between planning policy and Building Standards on the level of reduction.

Council response: Comment noted. The Proposed Plan specifies that a minimum 10% of the mandatory carbon reduction standard as set out in the Building Regulations is to be met by the installation and operation of renewable technologies. It is considered that this approach will enable Scottish Government requirements to be met but also allow for sufficient flexibility. Supplementary Guidance will address the implementation through layout and design.

Main Issue 11: Design Quality and Place Making

Greater clarity is needed on the Council's position on 'Designing Streets'. The revision and updating on the current SG on Housing Layout and Design should be undertaken urgently and co-operatively involving all relevant Council services, the development industry and local communities.

Council response: Comment noted. The revision of the 'Housing Layout and Design' SG will take on board 'Designing Streets'.

Main Issue 12: The Green Network

The preferred option for green networks is supported. However, there is scope for policy and guidance on the green network to allow opportunities for development within or adjacent to them that will make a positive contribution to green infrastructure and green corridors.

Council response: Comment noted. Any proposal for development within the green network will be assessed against the general policies of the plan.

00886 **Thomson Carmela**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on sites POL/B/2,3,13,15 & 17. Local infrastructure (particularly transportation, education and healthcare) will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00998 **Thomson & Dorothy Thomson Andrew B**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00858 **Tierney Fiona**

Comments: 5

Main Issue 1: Housing Growth

The preferred option of medium growth is too optimistic and a low growth scenario should be pursued. Most of the housing requirement to 2024 could be met from existing allocations through the 'low growth' option. There is a need to define and justify "flexibility allowance", which is in any case is considered inappropriate given the optimistic household projections.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections. However, in accordance with Scottish Planning Policy, the Council is required to provide a generous supply of housing land, and to build a degree of flexibility into the supply. Some additional sites are required to meet requirements and to provide this flexibility.

Vision

The preferred vision is considered to be over-optimistic and based on trends during a growth period. Housing requirements are likely to reduce during the Plan period. The focus for housing should be on the regeneration of empty homes and brownfield sites which represents a more sustainable form of development and which would strengthen existing communities. Preference is for the second alternative vision to retain the status quo.

Council response: The housing target for the Proposed Plan has been scaled back from that in the MIR in the light of revised household projections. There is a strong focus on the redevelopment of brownfield land, although a number of greenfield sites are included to ensure choice and flexibility in the supply. SPP emphasises the need to provide a generous supply of land for housing.

Main Issue 2: Sustainable Housing Locations

The Council should pursue consolidation and a low growth scenario for the Rural South, focusing on regeneration and developing existing identified sites. The flexibility allowance is unquantified and too high, and this together with the absence of windfall and small sites in the housing calculations, means the Plan is at risk of over-supplying housing land to the detriment of regeneration, sustainable housing locations and the consolidations of existing communities.

Council response: The amount of additional land allocated for housing in the Rural South through the Proposed Plan (over and above existing committed sites) is only 70 units, which is not considered excessive.

Main Issue 4: Infrastructure for Growth

It is considered that local infrastructure is insufficient to support growth beyond existing housing allocations in Rural South.

Council response: The Proposed Plan scales back the amount of new housing in the Rural South area compared to the MIR in the light of infrastructure and economic constraints.

SHIE/B Shieldhill Potential New Sites

Objection is made to the allocation of Hillcrest Farm, Shieldhill (SHIE/B/02) and any additional housing in Shieldhill. Pursuing a strategy of consolidation, regeneration and low growth would do away with the need to release site SHIE/B/02. Proposals for housing development have been the subject of refusals of planning consent. The existing development at Hillcrest was on a brownfield site, and development of the site would erode the countryside and lead to settlement coalescence. The site assessment in Technical Report 2 identifies a number of infrastructure limitations. In addition there are frequent gas supply reductions to Hillcrest Square, the road network is insufficient, there would be loss of open, recreational space and loss of valuable wildlife habitat, loss of village identity and exposure of housing to high winds. In particular, Braes High School has almost reached capacity. The potential adverse on ecology is also noted in the Environment Report and Habitats Regulation Appraisal.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate ecological and landscape impacts. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

00859 Tierney Robert

Comments: 5

Main Issue 1: Housing Growth

The preferred option of medium growth is too optimistic and a low growth scenario should be pursued. Most of the housing requirement to 2024 could be met from existing allocations through the 'low growth' option. There is a need to define and justify "flexibility allowance", which in any case is considered inappropriate given the optimistic household projections.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections. However, in accordance with Scottish Planning Policy, the Council is required to provide a generous supply of housing land, and to build a degree of flexibility into the supply. Some additional sites are required to meet requirements and to provide this flexibility.

Vision

The preferred vision is considered to be over-optimistic and based on trends during a growth period. Housing requirements are likely to reduce during the Plan period. The focus for housing should be on the regeneration of empty homes and brownfield sites which represents a more sustainable form of development and which would strengthen existing communities. Preference is for the second alternative vision to retain the status quo.

Council response: The housing target for the Proposed Plan has been scaled back from that in the MIR in the light of revised household projections. There is a strong focus on the redevelopment of brownfield land, although a number of greenfield sites are included to ensure choice and flexibility in the supply. SPP emphasises the need to provide a generous supply of land for housing.

Main Issue 2: Sustainable Housing Locations

The Council should pursue consolidation and a low growth scenario for the Rural South, focusing on regeneration and developing existing identified sites. The flexibility allowance is unquantified and too high, and this together with the absence of windfall and small sites in the housing calculations, means the Plan is at risk of over-supplying housing land to the detriment of regeneration, sustainable housing locations and the consolidation of existing communities.

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Council response: The amount of additional land allocated for housing in the Rural South through the Proposed Plan (over and above existing committed sites) is only 70 units, which is not considered excessive.

Main Issue 4: Infrastructure for Growth

It is considered that local infrastructure is insufficient to support growth beyond existing housing allocations in Rural South.

Council response: The Proposed Plan scales back the amount of new housing in the Rural South area compared to the MIR in the light of infrastructure and economic constraints.

SHIE/B Shieldhill Potential New Sites

Objection is made to the preferred site at Hillcrest Farm, Shieldhill (SHIE/B/02), and to any additional housing in Shieldhill. Pursuing a strategy of consolidation, regeneration and low growth would do away with the need to release site SHIE/B/02. Proposals for housing development have been the subject of refusals of planning consent, the existing development at Hillcrest was on a brownfield site, and development of the site would erode the countryside and lead to settlement coalescence. The site assessment in Technical Report 2 identifies a number of infrastructure limitations. In addition there are frequent gas supply reductions to Hillcrest Square, the road network is insufficient, there would be loss of open, recreational space and loss of valuable wildlife habitat, loss of village identity and exposure of housing to high winds. In particular, Braes High School has almost reached capacity. The potential adverse on ecology is also noted in the Environment Report and Habitats Regulation Appraisal.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

00007 TMS Planning and Development

Comments: 8

Main Issue 1: Housing Growth

The Council's medium growth option is insufficient. The HNDA outlines the need for an additional 9350 units in the period 2014-2024 (935 units/year). Despite this, Falkirk Council's Preferred Option is only to plan for 725 units/year or 7250 units over the 10 year period, some 22% below the HNDA requirements. There is no assessment within the MIR or supporting documents of effectiveness of new sites. Housing allocations within the adopted FCLP are carried forward within the LDP with no assessment of their effectiveness set out. A full assessment of all residential sites proposed within the local development plan should be carried out and non-effective sites should be deleted. It is unlikely that the SIRR's, which are now part of the supply, will be able to deliver within the LDP period. By adopting an approach of relying on existing allocated sites to deliver development (whether or not their effectiveness has been demonstrated), this will reduce the assumed level of new allocations to be made through the local development plan process, potentially exacerbating supply issues. A generous 'effective' land supply will allow more productive progress to be made towards meeting identified needs, far more so that relying on historic allocations which are out of step with market realities (such as the identified SIRRs at Slamannan and Bo'ness).

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SIRRs at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

Main Issue 1: Housing Growth

The SIRR developments should be removed from the housing land supply calculations.

Council response: The Council has undertaken a review of the phasing and effectiveness of the existing land supply, including the SIRRs. The SIRRs at Bo'ness Foreshore and Slamannan have been discounted from the 2014-24 supply, in recognition that they have no immediate development interest. However, Banknock and Whitecross are still being actively pursued by developers. Their phasing has been adjusted.

Main Issue 2: Sustainable Housing Locations

The Banknock SIRR, while considered to have merit and likely to be substantially deliverable within the local development plan period, should be removed from the housing land supply calculations. Preferred site B&B/B/01 Coneypark 1, Banknock site appears a logical extension to the already allocated area while providing additional choice/flexibility in delivery within the village/local area. The approach set out within the Preferred Option is supported subject to the effectiveness of the land allocations being demonstrated.

Council response: Comments noted.

The housing delivered by the Banknock SIRR sites (H07 and M03) will not be removed from the housing land supply. In the latest edition of the Housing Land Audit (2011-2012) these two sites are projected to deliver 650 units up to 2024.

The A803 sliproad junctions with the M80 at Banknock and Haggs which are planned to be upgraded to accommodate committed growth along the A803 corridor between Coneypark and Dennyloanhead are not planned to be upgraded with enough spare capacity to accommodate additional development beyond that already committed to as part of the Falkirk Council Local Plan. Planning a further upgrading of capacity of this sliproad junction so soon after the currently planned upgrade is not considered to be appropriate due to the disruption this would cause, so significant additional housing development along the A803 over and above that already committed is not considered to be appropriate for development in the 2014-2024 period but could become a viable long term growth option.

Main Issue 2: Sustainable Housing Locations

Does not support the preferred option for Denny, promoting modest settlement expansion, largely through extension to Mydub, Carrongrove Paper Mill and Broad Street sites, plus Denny High School. The approach is imbalanced, illogical and fails to meet the Council's preferred development strategy for the local development plan area. There is an over-concentration on a small number of sites, which are constrained. There are allocations in the FCLP for 644 units. An additional allocation for 420 houses is proposed giving a total of 1064 units in Denny alone. It is considered the the distribution of sites across the area is unbalanced, and that there are a lack of options in Dunipace. The Council's preferred option for Housing Growth which includes utilising smaller sites that make use of spare infrastructure capacity, It is unclear why the site at Northfield Road, Dunipace has not been allocated for housing development. By limiting numbers within the development area, it is considered that the issues relating to environmental assets, flooding etc would be resolved. The previous development of 91 units was also supported by the Council Officers, SEPA, and SNH. There is also capacity at Dunipace Primary School. The position at Denny Primary School is that, as a result of committed and additional residential allocations, the capacity will be exceeded within the first 5 year local development plan period thereby requiring a significant extension to that school.

Council response: The MIR preferred option has been carried forward, with extensions to the three major existing sites of Mydub, Carrongrove and Broad Street confirmed. The Mydub and Broad Street sites combine to make up a Strategic Growth Area for the south east of the town. In addition, a site at Rosebank, Dunipace, which was a non-preferred site at the MIR stage, has been reappraised and identified as an allocation. Education capacity issues at Dunipace Primary School will require to be addressed. At the MIR stage, this area was considered to have long term potential, and in the light of the need to find additional sites to maintain the required level of flexibility, it is considered appropriate to bring it forward during the 2014-24 period.

The site at Northfield Road, Dunipace was not allocated as it falls within the 1:200 flood risk from the Avon Burn on the northern boundary and its tributary on the southern boundary of the site. There are other sites with more favourable characteristics for development within Denny/Dunipace. The principles of national advice on flood risk on greenfield sites have been applied and this site is not being taken forward for development.

Main Issue 2: Sustainable Housing Locations

Agree generally with overall preferred option for Polmont, although there is an over allocation within sections of the sub-area particularly in the Maddiston area around Vellore Road, the sites at Parkhall Farm 1,2 and 3 (site references POL/B/06, POL/B/07, and POL/B/14). There are already committed sites within the area partially developed/undeveloped (POL/B/09, POL/B/11 and POL/B/16). The impacts on the surrounding area and on existing roads and other infrastructure of the significant allocation proposed at Middlerigg, Reddingmuirhead (POL/B/05) remains unclear for this scale of allocation.

Council response: The focus of additional growth within the proposed plan will be at Maddiston East which will form a Strategic Growth Area as well as some limited infill opportunities. This is considered to represent the best option for greenfield expansion in the area in terms of landscape impact, accessibility, and impact on infrastructure. It is considered that this will provide sufficient choice and flexibility to meet the Housing Land Requirement.

The site identified within the MIR at Middlerigg, Reddingmuirhead has been removed. This is due to the scale of recent and projected growth in the area, landscape impact, and the requirement for primary school rezoning. The removal of the site addresses the outcome of the MIR consultation and concerns of the local community in relation to the above issues.

Main Issue 2: Sustainable Housing Locations

Disagrees with the low level of development within Rural North. Reference in the Main Issues Report (paragraph 3.60) is made to significant environmental and infrastructure constraints in respect of Torwood and Letham, however these are presently being addressed (Scottish Water upgrading works). With respect to Torwood, there are a range of suitable development options. The Glen Road plots (12 in total) are effective, would fit within the established landscape and reflect the established character of this part of the village. They would help meet a particular market requirement not being provided for elsewhere within the Rural North area. Development would also bring social and economic value. The larger proposals are also with significant merit. Together these allow other community and potentially, economic benefits to be realised. The site at Letham East (LET/B/01) would represent a fully effective residential land allocation of up to 40 units. It is considered

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effective and deliverable in accordance with established guidance. It would provide beneficial development of high quality (as per earlier submissions) within the village, and would be fully delivered within the local development plan timescales.

Council response: The MIR preferred option for reaffirming existing commitments and modest settlement expansion at Airth has been carried through into the Proposed Plan.

Following consultation on the possible allocations at Letham, no option enjoys sufficient support from the community to justify proceeding with a village extension. This option has therefore not been carried forward to the Proposed Plan. The focus of growth therefore remains the existing sites at Airth, augmented by an additional site at the north end of the village, and at Torwood. Growth potential in the longer-term period is assessed as low. Scope for any further substantial increase to the size of Airth is limited by primary school capacity and other constraints. Substantial growth in the other northern villages would be incompatible with their character and limited services

The Glen Road site has not been carried forward to the Proposed Plan due to ecological concerns relating to the loss of woodland. Torwood has poor accessibility to services and community infrastructure including additional pressure on Larbert HS. The village has seen considerable incremental growth in relation to its size over recent years, and further significant growth is therefore not considered appropriate.

Main Issue 2: Sustainable Housing Locations

If the Slamannan SIRR is to be an integral part of the commitments taken forward, the the Council should demonstrate its effectiveness. To add additional allocations will compound the delivery failure. There are similar concerns with Limerigg and Avonbridge. The 3 settlements outlined, Slamannan, Avonbridge and Limerigg account for some 1211 units or 62% of the Rural South land supply. Effective sites should be allocated elsewhere in the sub-area to ensure delivery. The site at Steins Brickworks, Allandale should be identified as a preferred site. Many of the previously outstanding issues have been resolved and the site has been subject to further assessments including a Transport Assessment, revised access arrangements, a Noise Assessment, SUDS scheme, and a Contamination Assessment. Further evidence has been provided related to potential impact on catchment schools. The site enjoys access to a range of services, and would bring brownfield land back into sustainable use. The site can deliver affordable housing, employment uses and significant new recreational facilities. The site would represent a fully effective allocation with committed developer interest and therefore would be deliverable in total during the local development plan period. Favour additional allocations in California over smaller more remote and less accessible villages such as Avonbridge and Limerigg which already have allocations above that of California. California is a more marketable location. It offers a level of infrastructure, community and related facilities to serve an expanding population. The site at Cliftonhill Farm (site reference CLA/B/01) appears as a logical site for allocation. It can be accessed through the adjacent allocated site (CAL/A/04), a site which is an effective site and the Cliftonhill Farm site is a logical extension.

Council response: Slamannan has no active developer interest and the appropriateness of large-scale housing has had to be reconsidered. The scale of growth at Slamannan has been considerably reduced, with a smaller site at Hillend considered to be a more appropriate, and viable site, in preference to sites to the south of the B803. It is identified as a Strategic Growth Area, but is deferred to the period post 2024. It is considered appropriate to support existing sites at Limerigg, Avonbridge, California and Standburn, with a cautious view taken of additional sites in view of historic lack of demand

Comments relating to Steins Brickworks and Cliftonhill Farm at California are noted. Cliftonhill Farm is not considered to be effective due to the site requiring to be accessed through another site, not yet developed. Stein's Brickworks is already progressing through the planning process, and it identified within the Village Limit. It is therefore not considered appropriate to identify it within the Proposed Plan.

POL/B Polmont Potential New Sites

Land to the rear of Burns Crescent should be allocated for residential development (POL/B/22). The site is well-located and could be readily integrated within the existing settlement.

Council response: The site at Burns Crescent has not been taken forward into the Proposed Plan. Development would have a significant adverse impact on the function of the green belt in this location, as well as a significant landscape impact on this prominent site.

00902 Tooley Edward

Comments: 1

MUR/B Muirhouses Potential New Sites

Concern is expressed about the preferred site at Muirhouses (MUR/B/02) due to the fact that Carriden Brae is already a dangerous road which is not fit for purpose. Development would create problems through construction vehicles, roadworks for services, and extra traffic.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. Further assessment suggests that there will be substantial impacts on trees and hedgerows which would have an adverse impact on the setting of the village and Carriden Estate. Public consultation has raised concerns about traffic issues on Carriden Brae.

**00843 Torwood Community Woodlands
Vision**

Comments: 6

Torwood Community Woodlands support the stated preferred vision, in particular the notion of networked greenspaces as

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Torwood's woodland is seen as a key component of the north Larbert green network, linking with Pleun Country Park and the Forth Valley Hospital woodland. The Council share this view in Technical Report 7.

Council response: Support welcomed.

Main Issue 1: Housing Growth

Torwood Community Woodlands would not be supportive of medium or increased growth in housing development in general as the growth in recent years has put tremendous pressure on roads and facilities in the Falkirk area. A period of lower growth with attention focussed on improving the environment for residents would be supported. Therefore the option of low growth and no further housing in Torwood is supported.

Council response: The level of projected housing growth across the Council area as a whole has been scaled down slightly in the light of updated household projections. The Council is nonetheless required to provide for a generous supply of housing land by Scottish Planning Policy. The strategy of consolidation for Torwood has been carried forward into the Proposed Plan.

Main Issue 10: Climate Change

Torwood Community Woodland would highlight that Torwood's woodland should be protected and maintained with further tree planting and this would contribute to the measures to combat climate change.

Council response: Policies in the Proposed Plan will safeguard ancient and semi-natural woodland, and other areas of woodland with biodiversity value. The over-arching Green Network strategy and relevant policies in the Proposed Plan seek to promote landscape improvement, woodland creation, habitat enhancement and outdoor access. Carbon storage is identified in the Strategic Objectives and Vision section of the Proposed Plan.

Main Issue 2: Sustainable Housing locations

Torwood Community Woodland note that the sites at Torwood School (TOR/A/01) and McLaren Park (TOR/A/02) are regarded as preferred sites for future housing development in the village of Torwood. This will bring an additional 25 housing units which, as stated in the Plan, 'is substantial in relation to the village size' and its limited services. There is concern about the level of development that has already taken place in the past decade in the village and the impact this has had on the character of the village. The need for further housing development here is questioned. The group's main objective is to protect and preserve the woodland in and around Torwood from the constant threat of development. In summary, any additional housing in Torwood is rejected for the reasons above. The additional (non-preferred) sites referred to (TOR/B/01, 02, 03, 04, 05 and 06) which would bring in excess of 570 new builds to the village would, as stated by the Council, lead to substantial loss of woodland and would be vigorously opposed.

Council response: The Proposed Plan limits the number of housing sites in Torwood to the two sites (McLaren Park and Torwood School) carried forward from the Falkirk Council Local Plan, in the light of the village's poor accessibility to services and community infrastructure and the severe constraints on sewerage capacity resulting from substantial incremental growth in recent years.

Main Issue 12: Green Network

Torwood Community Woodlands is supportive of the vision of promoting Torwood as part of the green network and would ask that the Council give consideration to making its woodlands a locally designated site, given its ancient woodland status, its wildlife and its important historical significance. As an active woodland group, they would be willing partners in developing recreational use of this greenspace and improving connections between Torwood and other woodland areas

Council response: Comment noted. Supplementary Guidance SG08 "Local Nature Conservation and Geodiversity Sites" will consider whether there are any new sites worthy of a local nature conservation designation.

Main Issue 13: Cultural Heritage

Torwood Community Woodlands would support recognition of its ancient monuments as being of great cultural and local heritage significance and would be keen to be involved in promoting them.

Council response: Comments noted.

00945 **Turner S**

Comments: 3

Main Issue 2: Sustainable Housing Locations

Additional development on greenfield sites in Bo'ness is unnecessary and undesirable, and will further destroy the historic character of the town.

Council response: One additional greenfield site in Bo'ness at Kinglass Farm has been allocated. The East Muirhouses site which was a preferred site in the MIR has not been carried forward into the Proposed Plan. Some additional greenfield housing growth is considered to be justified, particularly in the light of the Bo'ness Foreshore site being deferred to the period post 2024. The Kinglass Farm site can be sensitively integrated into the urban edge, and landscape impacts suitably mitigated.

BNS/B Bo'ness Potential New Sites

Development at the Bo'mains 1 site (BNS/B/01) should not be permitted as it would involve encroachment into the green belt. Problems with access on to Borrowstoun Road are highlighted, including the substandard nature of the road to the east, which is used for rat-running, and the junction to the west which is congested at peak times.

Council response: The site has been included as a proposal in the Proposed Plan. Notwithstanding the loss of green belt, it is considered to present a good opportunity for settlement expansion, rounding off the urban edge. Landscape impacts can be mitigated, and there are no overriding infrastructural constraints. The Bo'ness Foreshore site is no longer likely to come forward within the initial 10 year plan period, prompting the need to bring forward alternative sites.

MUR/B Muirhouses Potential New Sites

The site at East Muirhouses 1 (MUR/B/02) is opposed due to the existing problem of high volumes of commercial traffic on Carriden Brae, and the detrimental effect which development would have on character of the conservation area.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. Further assessment suggests that there will be substantial impacts on trees and hedgerows which would have an adverse impact on the setting of the village and Carriden Estate. Public consultation has raised concerns about traffic issues on Carriden Brae.

00893 **Walker Stuart**

Comments: 1

MUR/B Muirhouses Potential New Sites

The proposed development at Muirhouses (MUR/B/02) will cause increased traffic on Carriden Brae which is already very busy with HGVs. Greenfield areas are gradually being swallowed up. The trees along Carriden Brae should not be removed. Questions are also asked about drainage capacity and possible disruption on Carriden Brae if new drains are required.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. Further assessment suggests that there will be substantial impacts on trees and hedgerows which would have an adverse impact on the setting of the village and Carriden Estate. Public consultation has raised concerns about traffic issues on Carriden Brae.

00792 **Wallace Catherine**

Comments: 1

RUR/B Rural Area Potential New Sites

New housing at Blackbraes, California (RUR/B/02) would lead to the regeneration of the area which is badly needed.

Council response: No allocation has been made at Blackbraes in the Proposed Plan. The site is located in the countryside outside the boundary of existing settlements and its development would be considered to be unsustainable due to the distance from existing services. The site furthermore does not correspond with the footprint of the former community at Blackbraes. Allocated sites in the wider Rural South area are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

00830 **Wallace Sandy**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of the village. Sites POL/B/13,15 & 17 are not supported. Local road infrastructure will not be able to cope with the scale of development envisaged on all of these sites to the detriment of road safety.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

01019 **Walton J**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment. Development of this site would result in further loss of identity. Local infrastructure and amenities are struggling to cope with existing demands on them e.G. Schools, medical centre and roads. The site supports a variety of wildlife, and has mine workings underneath. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00997 **Warner**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01014 **Warner B**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01033 **Warner Mark**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00260 **Warren Consultants**

Comments: 3

Main Issue 3: Housing Need

Stirling Council's approach to affordable housing which has been driven by doubts about the funding of RSLs, is commended. They are concerned that affordable housing needs will not be met unless private sector affordable housing is allowed for, e.G. Small dwellings at commensurately low prices, legal agreements etc.

Council response: Comment noted - the Council liaises with neighbouring authorities on their approach to affordable housing provision

Main Issue 6: Countryside

The Council intends to go some way towards loosening up its housing in the countryside policy but this does not go far enough. Stirling Council approved a new housing in the countryside policy in early 2009 and, following the experience of using it over the last couple of the years, it is now a policy in the proposed plan, very similar to the original policy. It goes further than the MIR is suggesting, e.G. Infill within and extensions to existing building groups, brownfield sites etc. In fact it goes even further in the new proposed plan by supporting more substantial expansions to existing small settlements, i.E. Ones that are bigger than small building groups but are not big enough to have settlement boundaries.

Council response: Comments noted. The approach taken is considered to be appropriate to the area. A number of village expansions are supported in the Proposed Plan, as part of a strategy which tries to focus housing in the rural areas on existing communities. There is more flexibility in relation to redevelopment of farm steadings, and enabling development. Allowing housing development on brownfield sites generally in the countryside is not considered a sustainable approach.

GRE/B Greenhill Potential New Sites

The landowner is still keen on developing the site at Greenhill Road, Greenhill (GRE/B/01). It is anticipated that a noise survey will be carried out soon and this will establish more precisely the dwelling capacity of the site. The site's status as a Preferred New Site is supported.

Council response: The site has not been identified as an opportunity for housing growth in the Proposed Plan as the land is required to deliver EGIP proposals.

00834 **Watson Neil**

Comments: 2

Main Issue 2: Sustainable Housing Locations

The Council's preferred option, and approach within the Reddingmuirhead area is objected to. The area has seen a lot of growth over recent years and service provision is inadequate. There are school capacity issues, particularly at Wallacestone Primary. They would object strongly to any future catchment rezoning as they moved to the area specifically for their children

to attend Wallacestone.

Council response: The Middlerigg Farm site at Reddingmuirhead is not identified as a housing proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

Main Issue 5: Green Belt

In favour of retaining Green Belt in Falkirk and surrounding area as it would prevent further housing development.

Council response: The green belt has been retained, but with some selective releases to allow additional development opportunities in some communities.

00887 **Watt J**

Comments: 2

Main Issue 2: Sustainable Housing Locations

Mr Watt supports no more development for Larbert and Stenhousemuir, as clinics, dentists and schools are at capacity, and infrastructure could not take any more development. There should be more greenspaces made available.

Council response: Comments Noted. A strategy of consolidation is proposed in Larbert and Stenhousemuir which focuses on existing housing commitments. No further significant land releases for housing are proposed which will allow the surrounding Green Belt to remain in tact. A number of opportunities have been identified to improve the green network.

Main Issue 10: Climate Change

Wind farms are not favoured because the wind doesn't always blow, they can explode in high winds, and they can kill wildlife (birds). The best renewable energy would be marine/wave power.

Council response: Comments noted. The Scottish Government has set out ambitious targets for the generation of renewable energy. As required by the Scottish Government, the Council is producing a Wind Energy Spatial Framework and Supplementary Planning Guidance which will set out guidance for wind energy developments within the Council area. It is intended that the guidance will safeguard more sensitive areas, and direct development to more appropriate locations.

00824 **Waugh Jean**

Comments: 1

RUR/B Rural Area Potential New Sites

Support for small development in Blackbraes area (RUR/B/02).

Council response: No allocation has been made at Blackbraes in the Proposed Plan. The site is located in the countryside outside the boundary of existing settlements and its development would be considered to be unsustainable due to the distance from existing services. The site furthermore does not correspond with the footprint of the former community at Blackbraes. Allocated sites in the wider Rural South area are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

00951 **Welsh**

Comments: 1

SHIE/B Shieldhill Potential New Sites

Object to allocation of Hillcrest Farm, Shieldhill (SHIE/B/02) as a preferred site. There are problems with visibility when accessing on to Shieldhill Road, and access on to Hillcrest Square would not be supported. There are also road safety issues to do with the lack of pavements, and the pedestrian traffic during school times. The site is used for informal recreation and dogwalking. Braes High School is at capacity and cannot accommodate more development.

Council response: The site is identified as a housing proposal in the Proposed Plan, and is conceived as a consolidation of existing development at Hillcrest/Tappernail Farm. Although concerns are noted, the capacity would be restricted to 30 units, and subject to careful site planning to mitigate landscape impact. Capacity exists in the local primary school. The site offers opportunities to improve and manage habitats as a contribution to the local green network.

00965 **Welsh Lesley**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of village. Sites POL/B/2,3,13,15 & 17 are not supported.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00088 **Weslo Housing Management**

Comments: 11

Main Issue 1: Housing Growth

The medium growth preferred option is supported. A higher level of growth is likely to have a serious impact on schools, healthcare etc.

Council response: Support welcomed. Housing target has been scaled down slightly in the light of revised household projections.

Main Issue: Sustainable Housing Locations

Agree with the overall location of housing growth. As the areas in Bo'ness are in close proximity so this may impact on schools. However, being on the east side of the town this area provides close links to the motorway.

Council response: Support noted. School capacity is generally not a problem in Bo'ness.

Main Issue 3: Housing Need

Agree that a proportion of housing should be 'affordable' on private housing sites but this is dependent upon the funding available from the Scottish Government for this type of housing.

Council response: Comment noted and the Council will adopt a flexible approach to provision to take account of the funding squeeze from central government.

Main Issue 4: Infrastructure for Growth

Agree that a modest growth strategy would minimise additional significant infrastructure requirements. However, there is a problem with the transport network system in that the motorway link in Bo'ness is such that it can only be joined in the Edinburgh direction. Any new build on the east of town will only suit commuters travelling east towards Edinburgh. Any new commuters to Stirling, Glasgow will have to use local roads in order to join the motorway at Grangemouth thereby putting on additional pressures on these roads.

Council response: Proposed Plan proposal INF05 provides for safeguarding of land for northern leg of west facing slip roads at M9J3. Recently planning consent has been given by Falkirk Council for this section of slip road. Procedures to secure the southern west facing slip road is a matter for West Lothian Council.

Main Issue 5: Green Belt

The green belt should be preserved in order to stop towns merging thereby keeping each town's individuality. The green belt will also preserve natural habitats in the countryside.

Council response: Comment noted. The green belt has been largely retained, albeit with selective releases for development where appropriate.

Main Issue 6: Countryside

Agree with the proposed changes to countryside policies. Farm steadings were built to the standards of their day. There is no reason why properties should not be redeveloped/upgraded to fit in with modern living and expectations, e.G. Double glazing, improved insulation etc.

Council response: Support noted.

Main Issue 7: Employment Land

Economic development should be encouraged thereby tackling unemployment, and improving the diversity of Bo'ness. On the proposed Drum Farm South site any development in the nature of leisure and tourism can only enhance the town which has been in decline in retail and leisure facilities for a number of years. Agree that the sites at Bo'mains Industrial Estate, Bridgeness/Carriden Industrial Estate, Grangemouth Road and Kinneil Road should receive support for economic growth.

Council response: Comments noted.

Main Issue 8: Town Centres and Retail Provision

Bo'ness town centre has improved in recent years through the Town Centre Initiative. However there is still the tendency for the town's residents to shop out of town for their larger weekly/ monthly food requirements and would welcome a larger food retailer to be based in the town.

Council response: Comment noted. The need for better food retailing provision has been acknowledged in the spatial strategy. Although it has not been possible to identify a definitive site, the Town Centre boundary has been extended to the east to allow the possibility of retail opportunities as part of the Bo'ness Foreshore development.

Main Issue 9: Strategic Access and Sustainable Travel

Bo'ness would benefit from improved transport links - at present bus links are very poor to and from other towns particularly Edinburgh and Glasgow and other nearer provincial towns after 6pm.

Council response: The improvement of bus services is a matter for the Local Transport Strategy. The current local plan has opportunity TR.BNS01 which provides for the potential relocation of Bo'ness bus station.

Main Issue 10: Climate Change

The Falkirk area is fairly densely populated with a relatively low number of open spaces to accommodate wind farms. Whilst supporting renewable energy one must balance this against placing wind farms in small areas thereby marring the natural beauty spots of the area.

Council response: Comments noted. The Council is producing a Wind Energy Spatial Framework and Supplementary Planning Guidance which will set out guidance for wind energy developments within the Council area. It is intended that the guidance will safeguard more sensitive areas, and direct development to more appropriate locations.

Main Issue 12: The Green Network

Support for the protection of the wooded area at Kinneil and Carriden. They are exceptional areas of beauty in the area and should be maintained to preserve natural habitats of both flora and fauna.

Council response: Support noted.

00873 **Whyte Jane**

Comments: 1

Main Issue 2: Sustainable Housing Locations

Development of sites POL/B/2,3,13, 15 & 17 is not supported. Local infrastructure (particularly schools, transportation and healthcare) will not be able to cope with the scale of development envisaged on all of these sites.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00862 **Whyte Stephen**

Comments: 1

Main Issue 2: Sustainable Housing Locations

Development of sites POL/B/2,3,13, 15 & 17 is not supported. Local infrastructure (particularly schools, transportation and healthcare) will not be able to cope with the scale of development envisaged on all of these sites. The development of these sites will reduce access to the countryside in the Brightons/ Wallacestone area.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00868 **Williamson Paul**

Comments: 2

Main Issue 2: Sustainable Housing Locations

Whilst the importance of housing growth (and wider economic growth) for the Falkirk Council Area is recognised, it should be undertaken in a manner, which caters for the existing communities that would be affected. Many of the sites indicated with the Main Issues Report appear to be tag-on's to existing villages which in the past have lost many services. Therefore any new proposals which may come forward as part of the Local Development Plan, should ensure that a mix of uses is proposed. More consideration should be given to creating sustainable mixed communities, as highlighted through SPP. It is imperative to ensure that future development in Falkirk, and particularly in the Polmont area takes place in locations which are sustainable. While it is appreciated that Falkirk has a large commuting population, more opportunities should be to provide mixed use development to allow residents to live and work in the same area in accordance with Scottish Planning Policy.

Council response: Comments noted. A number of the larger allocations in the Proposed Plan are for mixed use, with housing integrated with employment and community uses. However, there is also a major role for smaller scale community expansions which can make use of existing infrastructure capacity or where existing infrastructure is capable of being upgraded through developer contributions.

POL/B Polmont Potential New Sites

Development of the Middlerigg site (POL/B/05) for housing is not supported as: it is a prominent site where development would have a significantly adverse landscape impact; it will increase capacity pressures at both Braes High and Wallacestone Primary Schools; there is insufficient local public transport provision and pedestrian access to the site to encourage sustainable transport use; the local road network does not have the capacity to accommodate the scale of development without causing additional road safety issues; there are likely to be land stability issues due to historic undermining of the area; ground conditions are likely to be boggy and unsuitable for development; and purely housing development would contribute nothing towards establishing a sustainable mixed community in the area.

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00794 **Williamson Thomas**

Comments: 1

RUR/B Rural Area Potential New Sites

Support for development at Blackbraes (RUR/B/02). Would like to see Blackbraes become a village again.

Council response: No allocation has been made at Blackbraes in the Proposed Plan. The site is located in the countryside outside the boundary of existing settlements and its development would be considered to be unsustainable due to the distance from existing services. The site furthermore does not correspond with the footprint of the former community at Blackbraes. Allocated sites in the wider Rural South area are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

00898 **Williamson Park Residents Association**

Comments: 1

POL/B Polmont Potential New Sites

Williamson Park Residents Association object to the allocation of Sunnyside Road (POL/B/15) as a preferred site. It was the association's understanding that it is Falkirk Council policy not to allow any further access for developments from Sunnyside Road, or from unadopted roads such as Balmoral Gardens and Park Avenue. There has already been significant contractor traffic and damage to the roads during the construction of the existing Carronvale housing. This has also caused road safety issues relating to children attending Wallacestone Primary School. This will be exacerbated at times of peak traffic arising from the any new development.

Council response: The site has not been identified as a housing proposal in the Proposed Plan, in recognition of issues of effectiveness and school capacity.

00807 **Wilson Gordon**

Comments: 1

Main Issue 2: Sustainable Housing Locations

It is not appropriate to build new housing on farmland to the south of Brightons as this will destroy the semi rural character of this part of village. Sites POL/B/13,15 & 17 are not supported. Local infrastructure (particularly transportation and education) will not be able to cope with the scale of development envisaged on all of these sites to the detriment of road safety.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

00960 **Windross J**

Comments: 1

Main Issue 2: Sustainable Housing Locations

The non-preferred sites at Standrigg Road (POL/B/13 and POL/B/17) should not be allocated. There would be a significant impact in terms of wildlife and habitat, visual amenity, and public access. There is already extensive housing development in the area and access on to Sunnyside Road is constrained.

Council response: No housing growth is proposed in the area to the south of Brightons. None of the specified sites are to be taken forward as proposals in the Proposed Plan.

01028 **Wood A D**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

01027 **Wood Marion**

Comments: 1

POL/B Polmont Potential New Sites

Objection is made to the identification of the site at Middlerigg Farm (POL/B/05) as a preferred housing site. Reddingmuirhead has already suffered from overdevelopment and development here will result in the loss of an important green space around the village, stripping away the boundary of Reddingmuirhead and Wallacestone. Local infrastructure and amenities are struggling to cope with existing demands on them: in particular education facilities (rezoning of the site to Shieldhill PS would result in the community being split being three primary schools); health facilities; sewerage; Polmont railway station usage; and road infrastructure. The site supports a variety of wildlife, and has mine workings underneath. There are further concerns about the impact of the introduction of affordable housing, winter maintenance, and whether developers will be held to their promises. A preferable site is identified at Gilston .

Council response: The site has not been identified as a proposal in the Proposed Plan. This is in recognition of the scale of recent and projected housing growth in Redding/Reddingmuirhead, concerns about coalescence of communities, the implications of the required primary school rezoning, and the outcome of consultation with the community.

00533 **Young V**

Comments: 4

Main Issue 2: Sustainable Housing Locations

There is no reason to look at the provision of new settlements when there is opportunity to expand existing settlements such as California, which is considered to be an appropriate location for further development. Residential development in the Rural South is presently failing to meet Structure Plan and community requirements, including affordable housing. Further phased development of California would contribute to meeting current shortfalls in the area.

Council response: The site has not been identified as a proposal in the Proposed Plan. The site is subject to access constraints and lies beyond an existing housing allocation that has not yet been developed. Existing sites are considered to offer sufficient opportunity in an area of historically low demand and where market conditions remain challenging.

Main Issue 1: Housing Growth

The preferred option related to 'medium growth' is not considered to be appropriate. The preferred option plans for less units than the requirements outlined in the HNDA leaving a potential shortfall over identified need. There is no assessment of the effectiveness of FCLP sites which have been transferred into the housing land supply, a proportion of which are unlikely to be developed within the LDP period. A full assessment of all residential sites is required and those sites which will not be started within the Plan period should be replaced by effective allocations. There is also an over-reliance on SRRs contributing to the housing land supply. The 'high growth' option should be fully planned for through a generous effective land supply, and there should be an emphasis on utilising smaller sites. If a 'high growth' option is not pursued, the SRRs should revert to their 'in addition to' the required land supply status.

Council response: The proposed rate of housing growth has been scaled down slightly to 675 units per annum in the light of revised household projections which would not justify a high growth scenario. The Council has undertaken a review of the phasing and effectiveness of the existing land supply, and has discounted a considerable number of units from the 2014-2024 period, including the former SRRs at Bo'ness Foreshore and Slamannan. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, subject to an upturn in market conditions.

CAL/B California Potential New Sites

The site at Cliftonhill Farm, California (CAL/B/01) should be allocated for housing. It is appropriately sited within California. Proposed access is through site CAL/A/04, and an allocation at Cliftonhill Farm would be effective in the first 5-10 year period of the plan following on from the development of CAL/A/04. Infrastructure constraints, including education, could be addressed.

Council response: The site has not been identified as a housing proposal in the Proposed Plan. The site is subject to access constraints and lies beyond an existing allocation that has not yet been developed. Existing projected growth for California is considered sufficient and additional sites are not required.

CA/06 California Potential New Sites

Continued support for Structure Plan strategy of sustainable growth in all communities and general support for the Vision as set out in the MIR. However, to seek to deliver growth where there is no market interest is flawed, and the Proposed Plan will require greater emphasis on practical delivery.

Council response: Support welcomed. It is accepted that development delivery is a problem at present given market conditions. However, the plan is a long-term one which anticipates an improvement in the economic climate in the future.

Total comments on Document FLDP_MAIN: 788