

## Summary of Comments and Responses MIR2

| John   | 02904/FLDP_MIR/3001/003 |
|--|-------------------------|
| LDISUE: LDMI17   |                         |
| <b>Comment:</b>  |                         |
| Agree with reducing the housing supply target as proposed in the MIR.  |                         |
| <b>Response:</b>   |                         |
| Comment noted.   |                         |
| LDISUE: LDMI18   |                         |
| <b>Comment:</b>  |                         |
| More stalled sites should be removed from the plan.  |                         |
| <b>Response:</b>   |                         |
| Comment noted.   |                         |
| LDISUE: LDMI19   |                         |
| <b>Comment:</b>  |                         |
| Concerned about the level of housing growth promoted in the Longcroft area due to its impact on: the local and trunk road network; local schools; and doctors surgeries.   |                         |
| <b>Response:</b>   |                         |
| Comment noted. The Proposed Plan sets out the key infrastructure projects which are needed to address existing deficiencies and support growth in communities. In addition, developer contributions will continue to play an important role in delivering infrastructure which is required to mitigate the impacts of new development. |                         |
| <b>Comment:</b>  |                         |
| Building new houses within the greenbelt should not be allowed. Suggest that the "original" green belt should be brought back.   |                         |
| <b>Response:</b>   |                         |
| Comment noted. No further green belt releases are proposed in the Proposed Plan  |                         |
| LDISUE: LDMI20   |                         |
| <b>Comment:</b>  |                         |
| Plans for a thermal power station with CCS should be dropped. More trees should be planted instead to sequester carbon dioxide released from energy generation.  |                         |
| <b>Response:</b>   |                         |
| Comment noted. National Planning Framework 3 (NPF3) identifies carbon capture and storage network and thermal generation at Grangemouth as a national development. LDP2 is required to have regard to NPF3.  |                         |
| LDISUE: LDMI21   |                         |
| <b>Comment:</b>  |                         |
| Removing parking charges in Falkirk Town Centre will help to increase visitor numbers.   |                         |
| <b>Response:</b>   |                         |
| Comment noted. However, parking charges are not within the remit of LDP2.  |                         |

LDISSUE: LDMI23

**Comment:**

Concerns about the level of developer contributions required when developing new housing. Concerns about the time taken to spend any money collected.

**Response:**

Comment noted. Policy IR02 -Developer Contributions sets out the Council's approach to developer contributions, with detail provided in supplementary guidance. This approach follows Scottish Government policy.

LDISSUE: LDMI25

**Comment:**

Local plan policies should prohibit fracking regardless of the result of the Scottish Government's current review.

**Response:**

Comment noted. Policies IR15 and IR16 would likely be determining policies for a planning application relating to unconventional gas or oil extraction. The policies reflect current Scottish Planning Policy, which set out Scottish Ministers' expectations for local development plans. The Scottish Government's moratorium on unconventional gas or oil extraction remains in force.

No. of comments: 8

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| 1936 Investments | 02708/FLDP_MIR/3004/001 |
|------------------|-------------------------|

LDISSUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

1936 Developments seek the allocation of a site at Redding Road, Redding for housing (site 146). The site is currently under-utilised as a greenfield site. There are no ecological constraints on site, as evidenced by the extended Phase 1 survey. There are delivery difficulties with larger housing sites, and the Council should consider allocating smaller sites such as Site 146 as there are no significant upfront infrastructure costs.

**Response:**

The site is not identified as a housing proposal within the Proposed Plan. Whilst the site is no longer identified as a SINC (local ecological designation) its narrow shape, elevation, topography and proximity to railway would make it a difficult site to develop in a satisfactory way. Development may also result in adverse landscape and visual impacts, given the elevated nature of the site.

**Comment:**

The Council should consider allocation of sites at Standrigg Road, Wallacestone (site 147) and Redding Park North (site 145) for housing. There is a demand for housing development in these localities.

**Response:**

Standrigg Road 1 (site 147) is not identified as a housing proposal in the Proposal Plan. Reasons include low accessibility, potentially significant landscape impacts and cumulative impacts on the local road network. Redding Park North (site 145) is also not identified as a housing proposal in the Proposal Plan. Reasons include unsuitable vehicular access, low accessibility, potential loss of on-site woodland, impact on the green and habitat network and setting of the Union Canal.

LDISUE: LDMI20                      MIR2/B&B      MIR2 Bonnybridge and Banknock Sites

**Comment:**

Object to the omission of the site at Easter Thomaston (site 109), Banknock as an employment allocation.

**Response:**

Easter Thomaston (site 109) is not identified for employment uses in the Proposed Plan. The site is constrained by a number of issues, raising doubts over effectiveness. There are also doubts over whether development can be viably accessed via a new access to the trunk road or via the adjacent housing site at Banknock North. Planned upgrading at the junctions of the M80J7 with the A803 has not been designed to take into account the transportation impacts of the site's development. There is also no shortage of existing business land in the area which would suggest this allocation is needed.

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No. of comments: 3

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**Mark Agnew**

00835/FLDP\_MIR/3001/001

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LDISUE: LDMI18                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Supports the continued allocation of Hillcrest (site 056). However, the capacity should be increased to 90 units to reflect the characteristics of the site. The site has been subject to analysis under application P/16/0706/FUL which demonstrate that the site can accommodate a significantly larger number of units. This would be a sustainable use of the land which is allocated. The Shieldhill settlement boundary should also be extended to include the site.

**Response:**

On the basis of the existing consent for 91 units, it is considered appropriate to identify the site for 90 units in the Proposed Plan, based on an amended site boundary excluding the eastern part of the site, outwith the application boundary. However, it is not considered appropriate to bring the site within the Shieldhill settlement limit, as this development was intended as a consolidation of the existing Hillcrest development rather than an extension to Shieldhill. The landscape buffer between the site and the settlement edge will be important in terms of integrating the site into the landscape.

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No. of comments: 1

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**Airth Parish Community Council**

00189/FLDP\_MIR/3001/001

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LDISUE: LDMI18                      MIR2/RURN      MIR2 Rural North Sites

**Comment:**

Support for housing at Castle View (site 39) and look forward to current difficulties being resolved and the development proceeding.

**Response:**

Support noted. The site has been carried forward from LDP1 and is included as a housing proposal in the Proposed Plan.

**Comment:**

Support for housing at Graham Terrace (site 40). This will enhance the entrance to the village by replacing storage tankers with housing, and improve the outlook for homes at Castle View (site 39) and existing homes opposite.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. This reflects current doubts over the site's effectiveness. However, as a brownfield site within the village limit, future housing development is not precluded.

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**Comment:**

Support limited development on The Glebe 1 (site 42), provided houses are single storey and they are only located on land above flood risk level.

**Response:**

Support noted. The site has been carried forward from LDP1 and is included as a housing proposal in the Proposed Plan. The Proposed Plan notes that design should be sympathetic to adjacent housing and take account of potential flood risk.

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**Comment:**

It is recognised that planning permission has already been granted for Airth Castle South (site 41), however still concerned that area is high risk of flooding from the Pow Burn.

**Response:**

Comments noted. The site has been carried forward from LDP1 and is included as a housing proposal in the Proposed Plan. Flood risk will be taken into account through the detailed planning application.

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**Comment:**

Agree that The Glebe 2 (site 149) should be a non preferred site for housing as lower part is within the coastal flood risk area.

**Response:**

Support noted. The site has not been identified as a housing proposal in the Proposed Plan.

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**Comment:**

Agree that Eastfield 1 (site 150) should continue as a non preferred site for housing due to the possibility of localised flooding and presence of redundant mine shaft and underground mine workings. It would also extend the village beyond preferred limit of entrance to Airth Castle.

**Response:**

Support noted. The site has not been identified as a housing proposal in the Proposed Plan.

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**Comment:**

Agree that Eastfield 2 (site 151) should be a non preferred housing site as any development further east could put more houses at risk from coastal flooding in the future. Residents at Kennedy Way and Carse View would lose views of open countryside.

**Response:**

Support noted. The site has not been identified as a housing proposal in the Proposed Plan.

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**Comment:**

Accept mixed use proposal for Airth Mains Farm (site 148) if the proposal for restricted ownership (over 55) and visitor centre could be legally binding.

**Response:**

The site has not been identified as a mixed use proposal in the Proposed Plan. Whilst the tourism facility may have some merit and bring some economic benefit, development of the wider site has the potential for significant landscape impacts. There are also significant education capacity constraints, and potential access difficulties. Given the level of past growth, and existing allocations in the village, further significant expansion of Airth is not favoured.

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**Comment:**

Letham East (Site 155) is still considered a viable development which could prevent stagnation of Letham village.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. The site would impact on the setting of the Conservation Area and the wider landscape. The viability and effectiveness of the site are uncertain, and given the lack of local facilities and poor accessibility to other services significant housing growth is not favoured.

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**Comment:**

Newton Avenue South (Site 165) is considered unsuitable due to its history of flooding.

**Response:**

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

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**Comment:**

Newton Avenue North (Site 153) should be included in the MIR, as it is considered to be more suitable for development than Newton Avenue South (Site 165).

**Response:**

Neither sites on Newton Avenue have been identified as housing proposals in the Proposed Plan. Potential flood risk and access issues, combined with high development costs and uncertain marketability suggest neither site is likely to be effective.

No. of comments: 11

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**Ms Carol-Ann Anderson**

02888/FLDP\_MIR/3001/002

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LDISUE: LDMI16

**Comment:**

Creation of play areas within the woodland walkway between California and Wallacestone are the priority green network opportunities for this area.

**Response:**

Comment noted. The Falkirk Green Network GN14 opportunity identifies the Braes open space corridors as an opportunity for improvement in the Proposed Plan, although this is not specifically relating to the woodland east of California. There is provision in the Proposed Plan (GN25) for an outdoor learning site at Bellsrigg woodland, California.

LDISUE: LDMI18

**Comment:**

We should remove less stalled sites. Housing is desperately needed in the local area, it provides an opportunity to bring employment and economic enterprises to the area in the form of small businesses.

**Response:**

Comment noted.

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LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Wesleymount Farm (Site 220) in its entirety should be considered as a site for housing. There is much need for housing in the area and this site would be an ideal location for more social housing

**Response:**

The site does not represent a logical or necessary extension of the village in general. Church Road is constrained and is not favoured as a means of accessing substantial additional development. The site is of questionable effectiveness, and a number of other sites in the area have been de-allocated. Consequently, the site is not proposed for allocation for residential development in the Proposed Plan.

No. of comments: 3

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**Ms Emily Anderson**

02896/FLDP\_MIR/3001/001

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LDISSUE: LDMI19      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Objects to the allocation of land for housing at Crawfield Road, Bo'ness (site 102). Site is green belt. Bo'ness does not have the infrastructure to cope with this amount of unaffordable housing. New build houses at Kinglass are unaffordable by young people trying to get on the housing ladder. Crawfield Road housing would be even more expensive. Bo'ness needs more social housing and amenities such as reliable bus routes and more shops. Other land should be considered instead.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

No. of comments: 1

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**Mr Ian Angus-Felton**

02902/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

Overall vision is excellent and takes into account the uniqueness of this part of Scotland.

**Response:**

Support noted.

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LDISSUE: LDMI15

**Comment:**

Creating high quality places would be helped by passing some of the decision making into the hands of the ward specific councillors.

**Response:**

Comment noted.

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LDISUE: LDMI16

**Comment:**

The cycle path infrastructure across the whole region needs improving. The roads are in a poor state and dangerous for cyclists. Prevent further house building in lower Braes to protect the existing green spaces.

**Response:**

Cumulative impacts on the local road network, and other infrastructure were a key consideration in terms of the growth strategy for the Braes in LDP2, with the main areas of growth in the immediate local area continuing to be focused on existing sites at Maddiston East. The Proposed Plan seeks to identify a number of active travel opportunities, including new cycle routes across the Council area. Policies in the Proposed Plan also require new development to incorporate active travel connections.

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LDISUE: LDMI17

**Comment:**

Impossible to build another 9,600 homes without losing important greenspace. Falkirk is beginning to feel like a small city rather than a town. Most of the housing should be passed to neighbouring council areas to accommodate.

**Response:**

The Housing Need and Demand Assessment (HNDA), identifies housing need at 418 homes per year. Growth continues to be focused on areas where there is infrastructure capacity to accommodate new development. Whilst the Council seeks to encourage development of brownfield sites, there are a number of greenfield releases to add to the range of effective housing land across the Council area.

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LDISUE: LDMI18

**Comment:**

Stalled sites should all be removed, particularly in the Rural South villages. The Braes should be left as it is.

**Response:**

Comment noted. A number of stalled/non-effective sites have been de-allocated under the Proposed Plan.

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LDISUE: LDMI19

**Comment:**

There is no scope for further growth in the lower Braes due to school capacity issues and roads issues.

**Response:**

Comment noted. The focus for growth is located within areas where there is remaining infrastructure capacity to accommodate new development.

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LDISUE: LDMI21

**Comment:**

Callendar Square should be replaced with affordable housing, leisure and mixed retail.

**Response:**

Callendar Riggs (Incl Callendar Square) is identified for mixed use development (MU13). The exact mix is yet to be identified. The site is included in the Major Areas of Change guidance in the Proposed Plan, which sets out the key design principles for development.

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LDISSUE: LDMI22

**Comment:**

The Falkirk Wheel and the Kelpies are the two main attractions and activities should push tourists to these sites first and foremost.

**Response:**

Comment noted. The sites are both identified in the Spatial Strategy as tourism networks/themes and nodes. The Proposed Plan seeks to support the role of these visitor attractions.

LDISSUE: LDMI23

**Comment:**

Priority should be cycle paths, repairs to poor roads, and traffic calming measures.

**Response:**

Comment noted. Road maintainence is the responsibility of the roads network team within the Council. New cycling infrastructure is identified in a number of oportunities within the Proposed Plan.

LDISSUE: LDMI24

**Comment:**

Would like to see wind turbines in the Forth rather than the hills.

**Response:**

Comment noted. Onshore wind development is currently subject to detailed assessment against the Council's spatial framework and guidance, which will be revised under LDP2. Offshore developments in the Forth are identified in the Scottish Governments offshore wind farm development programme, however these are not close to Falkirk, which has a number of internationally protected ecological sites in the around the Firth Of Forth.

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|                         |  | No. of comments:        | 10 |
| <b>Mr James Anthony</b> |  | 00570/FLDP_MIR/3001/001 |    |

LDISSUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Mr Anthony seeks the inclusion of a site at Irene Terrace (Site 210) for housing in the form of 5 self-build plots. The development would support local services including the school, and the site can be considered effective and deliverable. The proposed ddvelopment would also deliver community benefit in the form of access improvements, and the transfer of land to community ownership.

**Response:**

The site is not allocated for development in the Proposed Plan. Development would constitute backland development, and would not be sympathetic to the prevailing settlement pattern. There are also access issues, and the effectiveness of the site is not clear.

No. of comments: 1



LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Mr and Mrs Anthony support the proposal for 5 self-build plots at Irene Terrace, Standburn (site 210). The proposed houses would be ideal starter homes, and there is a shortage of self-build plots in the area.

**Response:**

The site is not allocated for development in the Proposed Plan. Development would constitute backland development, and would not be sympathetic to the prevailing settlement pattern. There are also access issues, and the effectiveness of the site is not clear.

No. of comments: 1

LDISUE: LDMI18

**Comment:**

All stalled sites should be removed.

**Response:**

Comment noted.

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LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites**Comment:**

Oppose the development of new houses on farmland at Sunnyside Road (Site 221). The area is already over developed, local infrastructure is not suitable for increased development.

**Response:**

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

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LDISUE: LDMI21**Comment:**

I agree with the approach of increasing housing within town centres.

**Response:**

Support noted.

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LDISUE: LDMI22**Comment:**

There should be increased promotion of cycle paths and public footpaths. Perhaps Falkirk could be promoted as a Kiltwalk location.

**Response:**

Comments noted.

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LDISSUE: LDMI23

**Comment:**

Developers should be liable for the costs of new infrastructure as they are the ones who will profit.

**Response:**

LDP2 incorporates Policy IR02: Developer Contributions, which sets out the circumstances in which developer contributions will be sought in the Council area. The policy requires developers to contribute toward the provision, upgrading and maintenance of infrastructure where development would create or exacerbate deficiencies in existing infrastructure.

No. of comments: 5

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**Asda Stores Ltd**

00856/FLDP\_MIR/3001/001

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LDISSUE: LDMI21

**Comment:**

Support for the MIR's approach on the nature and level of developer contributions which will be related and proportionate to the impacts of individual development on local infrastructure.

**Response:**

Support noted.

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**Comment:**

References to 'discounters' should be amended as it is not appropriate. The identity of the retail operator is not a material planning consideration in the determination of a planning application, it is the use class that is being considered and not the individual business operator.

**Response:**

Discounters is not a reference used in the Proposed Plan.

No. of comments: 2

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**Mr James Ashe**

02761/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

Vision is good. There is lots of industry in the area and plenty of open space but this needs to be maintained. Sense of Falkirk being a collection of unique villages is starting to be lost through infilling of small areas of green belt. There is a lack of amenities in the Braes.

**Response:**

Comments noted. The Settlement Strategy in LDP2 for Braes and Rural South is for a focus on existing committed sites, in order to ensure that development can be accommodated through existing infrastructure. The concerns of Braes communities over provision and accessibility of community facilities is acknowledged in the Proposed Plan, and there is ongoing work by community planning colleagues on addressing priorities identified by the community. Policies in the LDP also seek to secure developer contributions to open space and community facilities alongside new development.

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LDISUE: LDMI15

**Comment:**

Need to keep the character and amenities of the individual villages, and reduce the rate of growth so they don't merge. Comments on the loss of historic buildings, such as former Maddiston PS.

**Response:**

There has been substantial growth across the Council area over the last 30 years, particularly within the Braes. This has resulted in the coalescence of some village. The Spatial Strategy going forward is avoid further coalescence, and to maintain the distinctiveness of settlements. The design policies going forward into the Proposal Plan continue to reflect Scottish Government Policy 'Designing Streets' and 'Creating Places' as well as the Place Standard and the six qualities of successful places. Comments about Maddiston PS noted. Policies in the Proposed Plan seek to ensure that historic buildings are retained, where possible and financially viable, as part of new development.

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LDISUE: LDMI16

**Comment:**

Helix is good, but care needed not to spoil it by trying to make it somewhere for everyone. Also there is an over concentration of resources - some of the investment should have gone to other local green spaces, e.G. Callendar Park. Need to stop building houses on small green areas. There are many opportunities for improving the standard of local paths.

**Response:**

The Falkirk Open Space Strategy sets out the main priorities for improvement of the green network, including areas of open space. The Strategy identifies local opportunities for enhancement, as well as strategic open spaces such as the Helix. The policies in LDP2 seek to ensure that opportunities for enhancement and provision can be secured, in part, through developer contributions.

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LDISUE: LDMI17

**Comment:**

Growth has been too great over recent years, particularly in Maddiston/Rumford/Brightons. This has put pressure on the road network, local train station and schools. Need to get more facilities in the area before adding more houses.

**Response:**

There has been substantial growth across the Council area over the last 30 years, particularly within areas of known marketability. This has impacted on infrastructure capacity such as the local road network and education. The focus on growth within the existing LDP and going forward to LDP2 is to focus growth on areas where there is remaining infrastructure capacity.

LDISUE: LDMI19

**Comment:**

Idea of retirement housing in Maddiston is supported. Queries the selling off of lots of the original sheltered housing in the area.

**Response:**

Support noted. The Council also has an ongoing programme of Council housing delivery, which can include supported housing for additional needs.

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**Comment:**

Objects to any potential development at Parkhall North (site 141). This would ruin the rural feel of the villages.

**Response:**

The site assessment (Technical Report 2) acknowledges the relatively low accessibility of the site, as well as the constraints including potential landscape and heritage impact. However, given the perceived need for the development of a care village, the site is included an allocation for retirement housing and a care home in the Proposed Plan. The focus continues to be on existing sites in the Maddiston East Strategic Growth Area.

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**Comment:**

Supports the retention of Maddiston Fire Station (site 140) for business related development, as opposed to housing.

**Response:**

Support noted.

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LDISUE: LDMI20                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Development at Gilston (site 95) has no future until odour issues from Avondale landfill are dealt with. Would rather see no development at this site.

**Response:**

The national Zero Waste Plan, reflects the reduced requirement for landfill capacity regionally and nationally. The site is currently subject to a phased restoration plan. Monitoring of the site, including odour, is undertaken by SEPA, in line with the site's waste management license.

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**Comment:**

Housing should not be built as part of the Falkirk Gateway (site 80).

**Response:**

The site remains a key economic development opportunity at the eastern end of Falkirk which will be carried forward into LDP2. The development mix requires adjustment to reflect changing market, with retail emphasis reduced. The introduction of housing is being promoted to assist overall viability and vitality of the site as a whole.

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LDISUE: LDMI21

**Comment:**

Queries why shops are leaving Falkirk Town Centre, in comparison to Stirling. Supports removing major retail development from the Falkirk Gateway. Central Retail Park takes people away from the Town Centre.

**Response:**

Comment noted. The Spatial Strategy and policies in the Proposed Plan seek to maintain the health and vitality of town centres by encouraging regeneration, encouraging residential uses within the town centre, improving transport links and accessibility, and promoting the 'town centre first' principle which seeks to prioritise town centres as the first choice for uses which generate significant footfall. There are, however, issues such as market challenged which cannot be fully addressed through the planning system.

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LDISUE: LDMI22

**Comment:**

Main tourist attractions are on the outskirts. More needs to be done to attract people to the Town Centre as well.

**Response:**

Falkirk Town Centre is identified as one of the key tourism themes/nodes in the Proposed Plan Spatial Strategy which will provide the focus for development opportunities. Proposed GN07 in the Proposed Plan also identified an opportunity to improve connectivity between the town centre and the Helix through an open space and strategic access corridor.

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LDISUE: LDMI23

**Comment:**

Highlights a number of issues including: parking and traffic issues associated with Polmont station; routes to motorway junctions need improved (e.g. Grandsable to A9); support for Avon Gorge upgrade; concern about traffic from Falkirk Gateway and congestion this will cause; and welcome for new traffic lights at Salmon Inn Road/Station Road.

**Response:**

Comments noted. Parking capacity at Polmont Station is a long-standing issue. The Council have explored options for car park capacity enhancement, but these were not technically or financially viable. There are a number of improvements to the local and strategic road network, including junction upgrades. These are identified on the Proposals Maps and in Appendix 1 - Proposals and Opportunities Schedule.

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LDISUE: LDMI24

**Comment:**

Agrees with the preferred options for energy.

**Response:**

Support noted.

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LDISUE: LDMI25

**Comment:**

Agrees with the preferred options for onshore gas, minerals and waste.

**Response:**

Support noted.

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No. of comments: 14

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**AWG Property**

00906/FLDP\_MIR/3002/002

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LDISUE: LDMI17

**Comment:**

The housing supply target should be realistic and ambitious, seeking to deliver growth above the recent 500 unit average rather than lower. A reduced target makes it more important that sites identified are effective and deliverable. The flexibility allowance of 15% is welcomed.

**Response:**

The housing supply target is set at 450 houses per annum in the Proposed Plan. This is higher than the figure produced by the HNDA, and is considered realistic, given the context of current completion levels, but also infrastructure constraints facing the area. The flexibility allowance has been set at 14% in the Proposed Plan.

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LDISSUE: LDMI18

**Comment:**

Pragmatic approach to stalled sites is welcomed. The approach to Bo'ness Foreshore is understood on the basis that there is no programmed output in the LDP2 period, but it could still be promoted with the aim of delivering it in the future.

**Response:**

Bo'ness Foreshore has been de-allocated in the Proposed Plan, given constraints, development costs and viability issues facing it. The site will remain as open space and, if market conditions improve, it is possible that this situation could be reviewed.

LDISSUE: LDMI19

**Comment:**

The preferred option for Bo'ness is supported. Progress with the recently consented development at Borrowstoun Road demonstrates there is a need for housing in Bo'ness. Growth through LDP2 would be consistent with the identification of long-term high growth potential in the current LDP. The site at Crawfield Road (site 102) is preferable to the alternative options set out in the MIR.

**Response:**

The preferred option for Bo'ness in the MIR has not been carried through into the Proposed Plan. A strategy of consolidation is proposed instead, with no further allocations over and above existing commitments. The existing sites which form part of the Bo'ness South East Strategic Growth Area provide for a substantial level of growth in the town over the plan period, and the completion of the Drum development is considered the priority.

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**Comment:**

Promotes site at Crawfield Road, Bo'ness (site 102) for housing and welcomes its inclusion as a preferred option for a new Strategic Growth Area in the MIR. The site provides an ideal opportunity to sustain and deliver long-term housing growth in Bo'ness. Site opportunities and constraints are revisited to reflect updated information, including landscape, green belt, access and transport, drainage, flooding, ground conditions, ecology and cultural heritage. A revised concept masterplan is provided.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

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No. of comments: 4

**Balfour Beatty Homes**

02702/FLDP\_MIR/3002/003

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LDISSUE: LDMI17

**Comment:**

Existing allocated sites throughout Falkirk need to be assessed for effectiveness, (otherwise allocating them is a paper exercise) and then supplemented or replaced by more effective sites. The MIR recognises Torwood falls within an area of high demand but existing allocated sites are failing to perform, which says more about the sites than the marketability of the area.

**Response:**

The effectiveness of sites has been fully assessed through the LDP2 process and is considered annually through the Housing Land Audit (HLA), with the 2016/17 HLA being used for the Proposed Plan.

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**Comment:**

The Housing Supply Target is set too low and is destined to fail due to the existing constrained land supply and the lack of new effective allocations being proposed. A far more ambitious approach is required.

**Response:**

The housing supply target reflects the HNDA and the projected reduction in the rate of household growth in the area. A flexibility allowance of 14% has been included, which complies with the range required by SPP.

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LDISSUE: LDMI19                      MIR2/RURN    MIR2 Rural North Sites

**Comment:**

Seeks the inclusion of Blairs Farm Torwood (site 152) for a mixed use development including residential (50 units), a hotel/restaurant, a local shop, a Garden Centre, public open space and woodland planting. The site comprises flat agricultural land adjacent to Torwood.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. It would represent a major extension of Torwood on the opposite side of the A9. There are significant environmental impacts, as well as education constraints and access issues. Given the lack of local facilities and poor accessibility to other services, significant housing growth in Torwood is not favoured.

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**Comment:**

The preferred allocation at Newton Avenue South Skinflats (site 165) should not be supported going forward. Aside from a range of related environmental impacts there is simply no likely market for such a development.

**Response:**

Newton Avenue South Skinflats (site 165) has not been identified as a housing proposal in the Proposed Plan.

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No. of comments: 4

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Mr Will Barclay

02908/FLDP\_MIR/3001/001

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LDISSUE: LDMI15

**Comment:**

Suggests that Judy Murray's tennis academy could be accommodated in Falkirk, perhaps at the Falkirk Wheel. This would also boost tourism.

**Response:**

Comments noted.

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LDISSUE: LDMI17

**Comment:**

Agrees with reducing the rate of housing growth.

**Response:**

Comments noted.

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LDISSUE: LDMI21

**Comment:**

Suggests introduction of a digital currency aiming to encourage customers to use independent shops, keeping more money circulating in the community. This has been done in Liverpool and Bristol, and is planned for Glasgow.

**Response:**

Comments noted.

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**Ms Janice Baxter**

02862/FLDP\_MIR/3001/001

LDISUE: LDMI19      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Objects to the proposed allocation of site at Crawfield Road, Bo'ness (site 102).

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

**Bellsdyke Consortium (NHS Forth Valley/Persimmon)**

02716/FLDP\_MIR/3002/002

LDISUE: LDMI19

**Comment:**

MIR strategy to restrict further growth in Kinnaird SGA and focus on other less buoyant markets is unsustainable and will not deliver the housing land requirement.

**Response:**

The plan seeks to distribute new homes across the Council area, having regard to infrastructure constraints and not concentrate solely on areas which are favoured by the market. This approach will enable most communities to benefit from new growth.

**Comment:**

Support for the re-allocation of Hill of Kinnaird 2 (site 94) to mixed use development. Promotes the site for a range of units between 70-150 well as commercial development and green space. Considers the MIR's indicative figure of 70 units falls short of what can be accommodated on the site.

**Response:**

Comment noted. The potential for housing on this site is dependent on any residual shortfall from the originally approved 1700 houses for Kinnaird Village. Any breach of the shortfall would have an unacceptable impact on local school infrastructure.

**Ms Rachael Black**

02912/FLDP\_MIR/3001/001

LDISUE: LDMI15

**Comment:**

Impressed by the progress made by the Council to promote and develop outside spaces over the last few years.

**Response:**

Comment noted.

LDISUE: LDMI16

**Comment:**

Proposals for community growing spaces and outdoor learning opportunities sound appealing.

**Response:**

Comment noted.



LDISSUE: LDMI19

**Comment:**

Concerned that further expansion of Bo'ness to the south will adversely affect the town centre. It would create commuter only housing lacking community spirit. Consideration needs to be given to supporting further development at the Carriden/Muirhouses/Foreshore area.

**Response:**

No further expansion of the town is proposed in the Proposed Plan, with the focus being on the existing allocated sites, notably Drum Farm. Bo'ness Foreshore is not considered to an effective site for large scale growth due to constraints, high development costs and viability issues. A site at Carriden/Muirhouses has been assessed, but is not considered the best option given significant landscape, ecological, and historic environment impacts, the impact on the character of the village of Muirhouses, and the constrained nature of Carriden Brae as an access to large scale development.

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No. of comments: 3

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**Blackness Area Community Council**

00054/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

The vision is commendable.

**Response:**

Support welcomed.

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LDISSUE: LDMI16

**Comment:**

The John Muir Way (JMW) has been a great success, linking Blackness to Bo'ness and beyond, and increasing footfall through Blackness. There is an opportunity to link the JMW to Rouken Glen Garden Centre and Mannerston Farm Shop via the Strip and another old footpath. The section of B903 from the Strip to Blackness PS needs a footpath reinstated for the safety of children.

**Response:**

Comments on opportunities for additional linkages to John Muir Way are noted. The John Muir Way continues to be a green network proposal in the Proposed Plan, reflecting the fact that opportunities for additional linkages and further route enhancement exist. These will be subject to further investigation.

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LDISSUE: LDMI18

**Comment:**

It is better to be realistic and remove all the stalled sites.

**Response:**

Comment noted. The Council has taken a balanced view of the prospects for stalled sites in the Proposed Plan. A number of sites have been de-allocated, but some have been retained where progress is still being made.

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LDISSUE: LDMI19

**Comment:**

The expansion of Bo'ness is supported, as this would help the town centre. Blackness urgently needs more affordable housing to allow families with young children to live in the village.

**Response:**

Comment noted. No developer interest has emerged in Blackness through the LDP2 process, either from private developers or affordable housing providers.

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LDISSUE: LDMI21

**Comment:**

The approach to town centres is supported.

**Response:**

Support welcomed.

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No. of comments: 5

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**Bo'ness Community Council**

00161/FLDP\_MIR/3001/001

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LDISSUE: LDMI19                      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Whilst Bo'ness Community Council understands the need for additional housing in Bo'ness and across the Falkirk Council area, objection is made to the proposed allocation of green belt land at Crawfield Road (site 102) for housing. The Drum development should be completed and the vacant industrial site at Linlithgow Road (site 78) considered before green belt land is utilised. Attention is drawn to flooding on Crawfield Road, cracking in the road and subsidence of the drains, and drainage issues in properties on Blair Avenue.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release. Housing growth in the town is focused on the existing allocated sites at the Drum. The vacant site at Crawfield Lane has been identified for mixed use, with potential for housing as part of this, in order to encourage its redevelopment.

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No. of comments: 1

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**Mr Campbell Boyd**

02483/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

The vision is supported as an aspiration. However, there are major challenges particularly for having 'thriving communities'.

**Response:**

Support and comment noted.

LDISSUE: LDMI15

**Comment:**

High quality places can be assisted by ensuring that each community has a heart.

**Response:**

Comment noted. The LDP aims to support community facilities including local retail provision. The Former Maddiston Fire Station Site is identified for employment/community/retail uses in the Proposed Plan, and the policies in the plan seek to ensure that new retail development does not impact on local retail centres.

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LDISSUE: LDMI16

**Comment:**

Paths should be linked up to form circular routes.

**Response:**

Policies in the LDP seek to ensure that enhancements to the path network can be secured in conjunction with new development. The Core Path Plan, together with the Falkirk Open Space Strategy identify where opportunities exist for improvements.

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LDISSUE: LDMI19

**Comment:**

Maddiston has enough housing with what is planned, given the load on community resources, particularly the primary school. Not enough land was allocated to Maddiston PS. To allow for possibly a new school or building a school annex at the Community Centre site and a new Community Centre built on the Fire station site requires that that Fire Station site is not given over to the housing.

**Response:**

Existing sites in Maddiston East and being taken forward into the Proposed Plan, with the addition of retirement/amenity housing at Parkhall Farm 5, which will not impact on Maddiston Primary school. Existing sites can be accommodated through a permanent extension to the school. New housing sites in the Council area are being focused elsewhere, where infrastructure capacity exists to accommodate new development.

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LDISSUE: LDMI20

**Comment:**

Building houses on business sites may turn out to be short-sighted.

**Response:**

A small number of sites identified in LDP1 for business development have been identified for mixed use in the Proposed Plan. This approach is taken on sites which are considered to be less marketable and effective for business land delivery, and where residential uses could be compatible in land use terms with business land.

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LDISSUE: LDMI21

**Comment:**

Need to understand why Linlithgow has managed to hang on to its many local independent traders compared to Falkirk Town Centre. There is nothing in the preferred approach which would halt the decline of Falkirk town centre.

**Response:**

Comment noted. The Spatial Strategy and policies in the Proposed Plan seek to maintain the health and vitality of town centres by encouraging regeneration, encouraging residential uses within the town centre, improving transport links and accessibility, and promoting the 'town centre first' principle which seeks to prioritise town centres as the first choice for uses which generate significant footfall. There are, however, issues such as market challenged which cannot be fully addressed through the planning system.

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LDISSUE: LDMI22

**Comment:**

The amount of Roman remains in the area needs to be better publicised.

**Response:**

The Antonine Wall World Heritage Site continues to play a part of the tourism mix within the Council area. The vision and policies in the Proposed Plan seek to protect and enhance the World Heritage Site, and encourage development which would complement the existing pattern of visitor attractions. An ongoing programme of improvements to visitor access is being currently led by Historic Environment Scotland, including new walking routes, a mobile app, new interpretation and public engagement events.

LDISSUE: LDMI23

**Comment:**

The bus network needs revised. For Maddiston residents it now requires a change of bus to get to a Sports Centre with a swimming pool. This does not help parents try to keep their kids fit.

**Response:**

Comment noted. The extent and route of local bus provision is determined by the operator, in consultation with Transport Planning, within Falkirk Council as part of the Local Transport Strategy.

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No. of comments: 8

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**BP Exploration Operating Company Ltd**

00483/FLDP\_MIR/3001/001

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LDISSUE: LDMI20

**Comment:**

The existing Policy BUS05 should be carried forward into LDP2 with minor amendments to supporting text to ensure that pipeline operators are consulted on planning applications within the consultation distance of the pipelines. The illustration of pipeline zones on the proposals map is supported however a clearer alternative to the grey hatching is recommended. Amend para. 5.73 of LDP to read: "Where a planning application falls within a consultation distance, the Council will consider the Health and Safety Executive's advice and will also take into account advice from the installation owner or operator, as well as site specific information in relation to the hazard, existing uses and regeneration benefits".

**Response:**

The existing policy has been carried through into LDP2 with some minor changes. Para 4.48 notes that the Council may also take into account advice from major hazard installation owners or operators in the consideration of planning applications.

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No. of comments: 1

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**M Bremner**

02919/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

It sounds good but is limited to central Falkirk and areas such as the Kelpies and Falkirk Wheel while places like Grangemouth are over industrialised.

**Response:**

The Vision is intended to address the whole of the Falkirk Council area including Grangemouth which it is acknowledged has a large industrial presence.

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LDISSUE: LDMI16

**Comment:**

Improving all parks and play areas would help create high quality places. Improvements to Zetland Park should be a priority.

**Response:**

Zetland Park is identified as a key open space asset and a range of improvements are proposed.

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LDISSUE: LDMI19

**Comment:**

Given numbers on the housing waiting list more housing is needed. Given that there doesn't appear to be any land available in Grangemouth for housing other than the nursery site existing housing stock should be upgraded. Stalled sites elsewhere should be removed from the supply if there is no prospect of their development.

**Response:**

Improvements to existing housing stock are implemented through housing services and would be supported by the plan. The support for the removal of stalled sites is noted.

LDISSUE: LDMI20

**Comment:**

Grangemouth has more than enough industry. More industry puts residents in danger of incidents such as the recent gas leak at Ineos.

**Response:**

The Proposed Plan acknowledges the need to balance industrial growth in Grangemouth with the needs of the local community. Additional industrial development will not necessarily be for major hazard developments and Policy JE06 seeks to limit development which would increase the number of people exposed to risk.

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LDISSUE: LDMI21

**Comment:**

Grangemouth town centre is the only one in the area not to have been regenerated. The town is ignored.

**Response:**

Grangemouth Town Centre is identified as an opportunity for redevelopment and the Plan supports it's redevelopment.

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LDISSUE: LDMI23

**Comment:**

There should be new outdoor recreation facilities, new paths and repairs to roads.

**Response:**

The Plan supports a range of proposals for greenspace improvements including path upgrades and road improvements.

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LDISSUE: LDMI24

**Comment:**

The development of the carbon capture and storage power station is not supported.

**Response:**

The National Planning Framework (NPF3) identifies Grangemouth as a site for a Carbon Capture and Storage development and the Plan must reflect this allocation.

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LDISSUE: LDMI25

**Comment:**

Totally opposed to fracking.

**Response:**

The plan does not support fracking but identifies policies which would be used to assess any development. The current Scottish Government moratorium on granting consent for unconventional oil and gas proposals effectively bans such developments.

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No. of comments: 8

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**Brightons Community Council**

00123/FLDP\_MIR/3002/001

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LDISSUE: LDI002

**Comment:**

The vision should recognise and take pointers for design, heritage and culture from its industrial and productive past and futures.

**Response:**

Comment noted. Paragraph 2.03 of the Proposed Plan Vision acknowledges the importance of place, including design and the historic environment, as well as the importance of Falkirk's industrial past.

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LDISSUE: LDMI15

**Comment:**

Buildings and spaces should reflect the history and traditions of the area to give them character and meaning. Developers should not be allowed to build the same houses everywhere in the UK. Overall the standard of housing design and placement is poor. Approach to development is too piecemeal.

**Response:**

Comment noted. The design policies going forward into the Proposed Plan continue to reflect Scottish Government Policy 'Designing Streets' and 'Creating Places' as well as the Place Standard and the six qualities of successful places.

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LDISSUE: LDMI16

**Comment:**

The Grange Centre should be recognised as a catalyst for outdoor pursuits and added amenity. It is vital to create quality open space in new developments including rough areas for woodland and scrub, as opposed to manicured open space.

**Response:**

Comment regarding the importance of the Grange Centre noted. New development is expected to deliver both active and passive open space on-site, or contribute to off-site improvements where appropriate. Provision of semi-natural open space such as woodland and scrub can form part of passive open space requirements where appropriate.

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LDISSUE: LDMI18

**Comment:**

The reasons for sites being unsuitable in the past will generally still be valid. However, problems with sites should not be used as an excuse to let developers develop on other easier sites.

**Response:**

The Proposed Plan seeks to provide a range of sites to meet the housing land requirement. The Proposed Plan includes a number of sites with delivery challenges, such as contamination or infrastructure requirements. A full assessment of the effectiveness and deliverability of all sites has been undertaken for the Proposed Plan. The Council is also keen to assist in delivering stalled sites through innovative funding mechanisms such as the Housing Infrastructure Fund.

**Comment:**

The proposed Whitecross development (site 76) should incorporate a train station as existing stations/parking are unlikely to service growth.

**Response:**

Initial scoping work was undertaken by the original developer into feasibility for a new rail station, and Network Rail were unable to support any proposal at that time. In terms of overall approach to new development at Whitecross, the Proposed Plan includes a more limited settlement expansion, to the south west of the village (Malcolm Whitecross), potentially accommodating up to 200 houses, together with business land at the works site. This is still likely to require some infrastructure upgrades, but at a more manageable and affordable scale.

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**Comment:**

The proposed development at the Haining (Site 036) is remote from any community, so is not sustainable. It would represent development in the countryside and would spoil the skyline from the north side. It is adjacent to ancient woodland which should be protected. Also it would cause loss of agricultural land.

**Response:**

Whilst the site is subject to a number of constraints including the presence of ancient and semi natural woodland, strategic access requirements and the proximity of a B-listed house, the site is capable of accommodating a limited number of units whilst retaining and managing the woodland. The site has therefore been carried over from LDP1 was part of the Maddiston East Strategic Growth Area.

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LDISSUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

The site at Polmont Station (site 136) is unsuitable for housing. Infrastructure is poor. Improvements to access would destroy the village feel of Station Road. It would involve the loss of countryside. The area has documented flooding issues and would increase coalescence of Polmont and Brightons communities.

**Response:**

The site is not identified for housing development in the Proposed Plan. The site is an important part of the green network and contributes to the setting and rural character of the Union Canal. Securing a satisfactory access into the site is problematic, given the nature of Station Road at this point, likely need for additional land to be acquired to form an access, and impact on the Polmont Burn corridor.

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**Comment:**

The site at Standrigg Road, Wallacestone (site 147) is not suitable for development as it is greenfield and would break the existing defined housing edge, encouraging ribbon development.

**Response:**

The Standrigg Road site (site 147) is not identified in the Proposed Plan for housing development. The site does not represent a logical extension to the urban area, has low overall accessibility, and there are constraints on the local road network. There would be potentially significant landscape impacts, due to its topography.

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**Comment:**

Preferred site at Parkhall Farm North (East) (site 142) is not suitable for amenity/community care housing. It is remote from facilities and public transport. More central locations would be preferable such as Oakbank, Polmont, which is not mentioned in the MIR.

**Response:**

The site assessment (Technical Report 2) acknowledges the relatively low accessibility of the site, as well as the constraints including potential landscape and heritage impact. However, given the perceived need for the development of a care village, the site is included an allocation for retirement housing and a care home in the Proposed Plan.

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LDISSUE: LDMI20      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

The Maddiston Fire Station site (site 140) should be mixed use. Small scale community workshop units should be provided.

**Response:**

Comment noted. Maddiston Fire Station is identified as a business site in the Proposed Plan with potential for retail, business and community facilities. The exact scale and location of these are subject to further market appraisal of commercial potential and community needs.

LDISSUE: LDMI22

**Comment:**

Haining Castle in the Whitecross area is an ancient monument being ignored and neglected. The Council should take a more proactive stance to ensure heritage bodies take interest and ownership of this building, to ensure it is not allowed to deteriorate any further.

**Response:**

Haining Castle is a Scheduled Monument, and sits within a wider strategic site identified for mixed use in the existing LDP. This proposal has been scaled back and rationalised under the Proposed Plan, and the castle now sits within a site proposed for business land, which is privately owned. Originally, the castle was intended to be safeguarded under the previous proposed development. Restoration of the castle will now likely only be a requirement in the context of a new application/development.

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No. of comments: 11

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**Ms Susan Buchanan**

02715/FLDP\_MIR/3003/001

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LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Susan Buchanan seeks the inclusion of Site 135 for housing within the Proposed Plan.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. It is an isolated location in the green belt, with low accessibility and a range of other constraints, including potential flood risk from the river Avon, and odour from nearby Avondale landfill.

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No. of comments: 1

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**Cala Homes (West) Ltd**

00512/FLDP\_MIR/3002/002

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LDISSUE: LDI002

**Comment:**

The vision lacks ambition and a more positive approach to delivering new homes should be considered by the Council in preparing its Proposed Plan. Assessment of the shortfall in the Housing Land Requirement 2020-2030 is estimated to be 4,275.

**Response:**

The scale of existing and new allocations, together with the windfall allowance, is sufficient to meet the housing land requirement, which includes 14% flexibility in line with SPP. This represents a substantial scale of growth which is commensurate with the Council's vision.

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LDISSUE: LDMI17

**Comment:**

The LDP must prioritise the delivery of the housing land requirement and focus on market areas where demand is greatest and which can be relied upon to deliver new homes. The Council's persistence in relying on larger scale sites which have not and will not deliver even the re-programmed allocations is a mistake.

**Response:**

The plan seeks to distribute new homes across the Council area, and not concentrate solely on areas which are favoured by the market. This approach will enable most communities to benefit from new growth. A number of LDP1 sites which had stalled due to a variety of factors have been de-allocated in the Proposed Plan.

**Comment:**

It is recommended that the completion rate should be increased to circa 600 units per annum and the flexibility allowance increased to 20%. This would offer some scope for expansion into Hill of Kinnaird East and provide certainty for the Council in delivery of the housing land requirement.

**Response:**

The housing target is based on the HNDA target. The HNDA has identified a housing need of 418 homes per year, and this has been increased in the Proposed Plan to an annual target of 450 homes per year. The flexibility allowance has been set at 14%.

LDISSUE: LDMI18                      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Bo'ness Foreshore (site 063) should be de-allocated. A developer was involved but withdrew and the Council has no intention to remarket the site. Both HLA 2015/16 and MIR acknowledge that the site is so constrained no housing can be programmed for the period to 2030.

**Response:**

Bo'ness Foreshore has been de-allocated in the Proposed Plan.

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**Comment:**

Drum Farm (site 064) should be re-programmed to enable the completion of the existing allocation before promoting even more housing, given the clear lack of market interest. The site remains uncomplete particularly at the northern end due to high development costs.

**Response:**

The programming at Drum Farm reflects the Housing Land Audit, and the sites are expected to be built out over the period of the plan. Development at Drum Farm North is progressing with Phase 6 commenced, and a planning application submitted for Phase 5. A PAN has been submitted for Drum South, which is expected to accommodate around 100 further units, due to the scaling down of the. No further housing land releases are being promoted in Bo'ness.

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**Comment:**

Whitecross New Settlement (site 078) should be de-allocated. The site stalled after the developer went into administration at the end of 2014. It is constrained by a number of factors including exceptionally high development costs relating to remediation of the site. It is an aspiration as there is no developer interest and no current proposals.

**Response:**

Whitecross is carried forward into the Proposed Plan, but the allocation is revised with a significant reduction in housing capacity. The former Manual Works brownfield site is re-designated for business/industry (BUS02) and the area to the south west of the village of Whitecross is carried forward as a separate housing proposal.

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**Comment:**

Broad Street Denny (site 067) was first identified in the HLA in 2011 and there has been no housing built to date after the developer withdrew interest. It is an example of reliance on a growth area which suffers high development costs and is physically constrained and incapable of delivering the units anticipated.

**Response:**

Broad Street is considered an effective mixed use site and is carried forward into the Proposed Plan. There is a developer attached to the site, and a PAN has been submitted.

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**Comment:**

Portdownie Falkirk (site 068) should be de-allocated, with any reference to residential use removed. The site is currently stalled and not actively being marketed by Scottish Canals / Falkirk Council. It is believed Scottish Canals do not envisage any housing on the site.

**Response:**

Portdownie is carried forward into the Proposed Plan as an important canalside regeneration opportunity. However, it is a non-contributing site to the housing land supply target, reflecting site constraints.

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LDISSUE: LDMI19                      MIR2/LAR      MIR2 Larbert and Stenhousemuir Sites

**Comment:**

Seeks the allocation of Hill of Kinnaird East (site 134) as a new Strategic Growth Area for a residential-led mixed use development which includes circa 1000 houses (25% affordable), a new primary school, a local centre, community green space and associated infrastructure.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. This site would represent a major extension to the urban area of Stenhousemuir into the green belt, with associated significant environmental impacts. There are also major education and transport constraints.

No. of comments: 9

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**Callendar Pharmacy**

02887/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

Vision is to be commended. Area has some of the best tourist attractions in Scotland, and Council needs to act on the vision in a positive manner.

**Response:**

Comment noted.

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LDISSUE: LDMI15

**Comment:**

Making places accessible is vital for making them high quality.

**Response:**

Comment noted.

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LDISUE: LDMI16

**Comment:**

The Town Centre needs to link to green network so that it can benefit from the additional visitors.

**Response:**

Comment noted. The Proposed Plan notes opportunities to connect Falkirk Town Centre to the green network, not least the proposed green corridor linking to the Helix.

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LDISUE: LDMI17

**Comment:**

From a business point of view, additional population helps the Town Centre, so a reduced rate of growth is not supported.

**Response:**

The reduced housing supply target of 450 houses per annum is adopted in the Proposed Plan. This reflects the HNDA and the projections for reduced household growth over the plan period. Nonetheless this remains a substantial level of growth which will assist in achieving the projected population of the area of 170,780 by 2039.

LDISUE: LDMI20

**Comment:**

The focus on the Falkirk Gateway could be to the detriment of the Town Centre. Whatever uses are permitted at the Gateway should not be in competition with the Town Centre. It needs to complement it, not replace it.

**Response:**

Agreed. Falkirk Gateway has been removed as a commercial centre in the Proposed Plan. Any retail uses would have to be justified in terms of policies and criteria covering out-of-centre retail use, including assessment of impacts on town centres.

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LDISUE: LDMI21

**Comment:**

The Town Centre needs to be looked at as a priority. Central Retail Park has thrived at the Town Centre's expense and should not be considered a part of the Town Centre. Suggestions of measures which would help include more free parking at certain locations, and bringing back some traffic flow into the High Street, even if it was just the eastern section. Concern expressed about development at Grahamston which could detract from the Town Centre and make the position of the Retail Park even stronger. Comparison is made with Newtownards in Northern Ireland, which has free parking and a one way flow of traffic on the high street, and is thriving. Vacant space in the Town Centre should be used to supply new homes.

**Response:**

Concerns about Central Retail Park's inclusion within the Falkirk Town Centre boundary are acknowledged, and it is accepted that the Retail Park has the character of a commercial centre as defined in SPP. Accordingly, Central Retail Park has been removed from the town centre boundary and classified as a commercial centre in the Proposed Plan. With regard to Grahamston, it is not expected that there will be a particular retail focus, or that development here will detract from the retail focus of the town centre core. The site is considered to present an important opportunity for regeneration which will benefit Falkirk Town Centre as a whole. The Proposed Plan encourages new housing within town centres.

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LDISSUE: LDMI22

**Comment:**

The Town Centre should have a tourist information centre.

**Response:**

Tourist information centres are established and managed by Visit Scotland, whose policy has been to have their iCentre at the Falkirk Wheel. This is not a matter which the LDP can influence.

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LDISSUE: LDMI23

**Comment:**

Falkirk bus station is not fit for purpose and needs to be either relocated or given a major facelift.

**Response:**

The opportunity to improve the bus station as part of the Callendar Riggs (East End) regeneration opportunity is highlighted in the Proposed Plan.

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LDISSUE: LDMI25

**Comment:**

On-shore gas extraction is the way forward and would provide a lot of local employment.

**Response:**

The Council's position as planning authority on this issue is dictated by the Scottish Government's ongoing moratorium on unconventional oil and gas extraction. In the meantime, the Proposed Plan policies reflect Scottish Planning Policy.

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No. of comments: 9

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**Mr Douglas Cameron**

02892/FLDP\_MIR/3001/001

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LDISSUE: LDMI20

**Comment:**

Welcomes removal of Falkirk Gateway as a commercial centre and recognition that major retail development here is not viable. Uses now proposed are welcomed. Better cycle routes and public transport to the Falkirk Gateway from Falkirk and Grangemouth Town Centres is needed. Proposals for other major employment sites appear sensible and welcome.

**Response:**

Support welcomed. Falkirk Gateway has been removed as a commercial centre in the Proposed Plan. Any retail uses would have to be justified in terms of policies and criteria covering out-of-centre retail use, including assessment of impacts on town centres.

LDISUE: LDMI21

**Comment:**

Proposal to emphasise 'town centre first' is welcome. However, the inclusion of both phases of Central Retail Park (CRP) within the Falkirk Town Centre boundary is questioned. The Council's support for this position needs to be backed up by evidence. CRP does not meet the criteria to be a part of the Town Centre. Relaxation of planning controls over CRP has exacerbated the imbalance between the Retail Park and the traditional Town Centre. CRP should be identified as a commercial centre instead in line with SPP. Encouragement of mixed use and suggested relaxation of developer contributions is welcome. It is odd that the MIR makes no mention of the potential relocation of the Municipal Buildings and Town Hall civic facilities.

**Response:**

Concerns about Central Retail Park's inclusion within the Falkirk Town Centre boundary are acknowledged, and it is accepted that the Retail Park has the character of a commercial centre as defined in SPP. Accordingly, Central Retail Park has been removed from the town centre boundary and classified as a commercial centre in the Proposed Plan. The Proposed Plan identifies the Municipal Buildings as a potential redevelopment opportunity, but decisions over the future of the Council's HQ have yet to be made.

**Comment:**

The scale of the Grahamston railway station development site is significant relative to the potential impact on the traditional town centre area to the south. Road access to the Grahamston site is constrained by its location and surroundings. Given that many of the road access routes to this site and the adjacent Retail Park are congested, some reference should be made to traffic infrastructure solutions and the proposed usage of the site.

**Response:**

Further information on the Grahamston opportunity is provided in the Proposed Plan, although further feasibility work is required to scope out the nature and extent of potential future development. The requirement for transport assessment for significant proposals is highlighted.

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No. of comments: 3

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**Martin Carmichael and Sharon Harley**

00829/FLDP\_MIR/3001/001

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LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Does not support further housing at Standrigg Road 2 (site 221). The road is extremely busy already and local infrastructure cannot cope with additional housing.

**Response:**

The Standrigg Road 2 site has not been identified as a housing proposal within the Proposed Plan in the basis of landscape, ecological impacts, as well as concerns about the capacity of local road network infrastructure and low overall accessibility.

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No. of comments: 1

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**Ms Grace Chalmers**

02771/FLDP\_MIR/3001/001

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LDISUE: LDMI19

**Comment:**

Concerned about the land on Muir Drive in Hill of Kinnaird which was supposed to be for a nursing home.

**Response:**

A planning application for a nursing home on Muir Drive has not been forthcoming. Take up for commercial uses is market dependent.

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**Comment:**

Agree with proposal for only 70 units on Hill of Kinnaird 2 (site 94), with the rest of the site being used as community space. There is no recreational space for all the houses already built. Suggestion for a hall or games area.

**Response:**

Support and comments noted.

No. of comments: 2

Mr T Mrs Chance

02750/FLDP\_MIR/3001/001

LDISSUE: LDMI19 MIR2/BNS MIR2 Bo'ness Sites

**Comment:**

Objects to allocation of land at Crawfield Road (site 102) for housing. Site has been previously rejected for housing. It is unsuitable due to speed of traffic and flooding on Crawfield Road, additional traffic generated, and Deanburn PS parking issues. Question as to what education and healthcare provision is proposed.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

No. of comments: 1

Mr Barry Chapman

02879/FLDP\_MIR/3001/001

LDISSUE: LDMI19 MIR2/BNS MIR2 Bo'ness Sites

**Comment:**

Objects to allocation of land at Crawfield Road (site 102) for housing. The site is green belt. There will be adverse impacts on wildlife habitats and woodland, including Bo'mains Meadow. Flora and fauna will be adversely affected. Development will increase traffic causing pollution and noise. People will travel to Linlithgow for shops and services with adverse impacts on parking, pollution and congestion in Linlithgow High Street. The area is used by locals and tourists for recreation, including the John Muir Way. Development will damage the character and amenity of established areas.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

No. of comments: 1

Chemical Cluster Companies

00878/FLDP\_MIR/3002/001

LDISSUE: LDI002

**Comment:**

The vision of a growing economy is supported. The support for a low carbon economy is noted however the economic impact of sustainability requirements on businesses must be taken into account in particular in relation to energy costs and global competitiveness.

**Response:**

The comments are noted.

LDISUE: LDMI20

**Comment:**

The continuation of the major hazard policy with any required adjustments to comply with regulations is supported. The extension of the preferred areas for business and industry to cover areas of Wood Street, Dundas Street and Dalgrain Road is also welcomed. The preferred option of consolidation in Grangemouth noted in the environmental report is supported. References to the ability of the new HSE webapp to record historic consultations in the SEA baseline report require clarification.

**Response:**

The Major Hazards Policy is carried through into the Proposed Plan with minor amendments and the Core Business Area has been extended to include part of Wood Street, Dundas Street and Dalgrain Road. The HSE Webapp includes a record of all consultations carried out since 2015.

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LDISUE: LDMI23

**Comment:**

The Grangemouth Station safeguarding is not objected to in principle but assurances are sought that it will not prejudice the development of the chemical companies businesses. A full assessment of the health and safety implications of the development will be required. Technical Report 1 should be updated for LDP2. In Technical Report 4 the Flood Prevention Scheme is supported as are proposed improvements to the local and national road network. References to the COMAH Regulations in Technical Report 4 should be updated to the 2015 COMAH Regulations. Technical Report 6 Employment Land should include the short company profiles included in the introduction to this submission. The reference to flood risk as a constraint on page 22 of Technical Report 6 for ED12 Earls Gate Park is not relevant and should be deleted.

**Response:**

The safeguarding of a site for a station at Grangemouth is not considered likely to impact on the chemical companies and a full HSE assessment will be carried out should the proposal come forward. The updated reference to the COMAH Regulations is noted. The reference to flood risk at Earls Gate Park is retained to reflect the potential need to address surface water drainage.

LDISUE: LDMI24

**Comment:**

Comments on the proposed energy policy and district heating policy are reserved until further details of the policies are available. Policies should contain support for gas fired CHP plants recognising the need for a balanced energy portfolio and the needs of companies to generate onsite electricity and heat. Heat is a vital component for some industrial sites and it should be recognised that sites may not have spare capacity for any district heating network. Progress on the district heating network also needs to be made in the near future to enable companies to incorporate this into their energy planning.

**Response:**

The comments are noted.

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No. of comments: 4

Ms Kate Christie

02922/FLDP\_MIR/3001/001

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LDISUE: LDI002

**Comment:**

Vision covers all relevant issues. Agrees with Falkirk being 'the place to be'. Good that the challenges of the economic downturn have been acknowledged and will be addressed.

**Response:**

Comment noted.

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LDISUE: LDMI15

**Comment:**

Ensure that all development is planned in partnership with communities and involves as many stakeholders as possible. Ensure that development is well thought out and will not have a detrimental impact on communities, wildlife or the landscape.

**Response:**

Comment noted. The LDP has involved extensive consultaion with stakeholders and the local community. Consultation on development frameworks, masterplans and planning applications will provide more detailed opportunities for stakeholder and public involvement as the plan is delivered.

LDISUE: LDMI16

**Comment:**

The area is well served by greenspace, which gives it its character and contributes to well being. Important to keep this level of greenspace and to prepare guidance so future development is respectful of the existing area.

**Response:**

Comment noted. Policies in the Proposed Plan seek to ensure that green and blue infrastructure in enhanced and provided through new development. The Council will also prepare supplementary guidance on green infrastructure delivery.

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LDISUE: LDMI17

**Comment:**

Agrees with reducing growth rate given pressure on local infrastructure.

**Response:**

Comment noted. There has been substantial growth across the Council area over the last 30 years, particularly within areas of high market demand. The reduction in the housing supply target reflects the projected reduction in the rate of household growth set out in the Housing Needs and Demand Assessment, but also acknowledges that there are significant infrastructure constraints affecting the area.

LDISUE: LDMI18

**Comment:**

If there is little hope of the developments going ahead, it would seem sensible to remove stalled sites.

**Response:**

Comment noted. The Proposed Plan proposes the removal or rationalisation of sites subject to effectiveness and deliverability issues. Mechanisms such as the Housing Infrastructure Fund continue to be explored to unlock stalled development sites requiring significant infrastructure investment.

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LDISUE: LDMI19

**Comment:**

Local amenities in the Lower Braes area are already stretched to capacity and more housing would make matters worse. Supporting infrastructure has to be in place before allowing large scale developments to go ahead.

**Response:**

Comment noted. The focus on growth within the Braes in the existing LDP and going forward to LDP2 is to focus growth on areas where there is infrastructure capacity to accomodate development, or where capacity enhancements can be clearly deliverable in conjunction with new development. The Proposed Plan continues to focus development at Maddiston East.



LDISUE: LDMI20

**Comment:**

Agrees with the approach taken to business locations, although concern is expressed about the impact of traffic in Grangemouth if there is more port related activity and a power station.

**Response:**

Comments noted. The Proposed Plan sets out specific requirements for the improvement of the local and strategic road network in Grangemouth in conjunction with business sites at Boness/Wholeflats road and Grangemouth Docks.

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LDISUE: LDMI21

**Comment:**

Falkirk Town Centre has suffered due to popularity of Central Retail Park and internet shopping. High rates are a problem for local businesses. However, some businesses are successful, suggesting that people still want to use the Town Centre. Mixed use opportunities may attract more people and businesses.

**Response:**

The Spatial Strategy and policies in the Proposed Plan seek to maintain the health and vitality of town centres by encouraging regenerating, improving transport links and accessibility, and promoting the 'town centre first' principle which seeks to prioritise town centres as the first choice for uses which generate significant footfall. The Proposed Plan also aims to encourage residential and mixed-use developments within town centres.

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LDISUE: LDMI22

**Comment:**

Tourism is vital to the area's economy. Suggests focusing on the canal, and promoting the Bo'ness steam railway more widely. Helix suffers from parking and traffic problems.

**Response:**

The Spatial Strategy in the Proposed Plan sets tourism themes, networks and nodes and seeks to enhance the strong visitor economy. The Canal network is also identified as a key tourism and recreational asset, and a key part of the Falkirk Green Network.

LDISUE: LDMI23

**Comment:**

Agrees with the priorities including cemetery extensions, Grangemouth flood prevention and more active travel routes. Developers should make a significant contribution towards infrastructure costs.

**Response:**

Comment noted. Policies in the Proposed Plan require developers to contribute towards key infrastructure provision and enhancement, including green infrastructure, education, healthcare and transport network improvements.

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LDISUE: LDMI24

**Comment:**

Insufficient information on the proposed power station in Grangemouth. Raises issues of air quality and increased major hazard risk. Use of onshore wind and district heating is supported.

**Response:**

Comments noted. The detail of specific energy-related proposals is not at a stage where it can be reflected in detail in the Proposed Plan.

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LDISUE: LDMI25

**Comment:**

Agrees with the preferred options. Strongly opposed to the use of 'fracking'.

**Response:**

Comment noted.

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No. of comments: 12

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**Mr Gordon Cook**

00890/FLDP\_MIR/3001/002

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LDISUE: LDMI18

**Comment:**

Planning should be given on the basis that the development commences within a reasonable timescale or the sites will have planning consent removed altogether.

**Response:**

A full assessment of the effectiveness and deliverability of all sites has been undertaken for the Proposed Plan. Technical Report 3 Section 7 sets out further details of effectiveness and the existing land supply. Assessment of effectiveness of sites is undertaken through the annual Housing Land Audit, and take into consideration a number of factors including planning status, housebuilder involvement, and site constraints. The duration of consent forms part of the Planning (Scotland) Bill, which is currently undergoing parliamentary and public scrutiny.

LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Objects to potential development of the site at Standrigg Road, Brightons (site 221) for housing. The area has been allowed to grow over recent years with no increase in supporting infrastructure. Issues include inadequacy of roads/footpaths in the vicinity, capacity issues at local schools, and parking issues at Polmont Station.

**Response:**

Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. The site is therefore not identified for housing development in the Proposed Plan.

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LDISUE: LDMI22

**Comment:**

There is little to do at the Helix, and the parking is poor. The land opposite B&Q could be utilised as car parking.

**Response:**

Comment noted. The Helix is managed by Falkirk Community Trust. The land opposite B&Q forms the Galkirk Gateway, which is identified as a strategic mixed use site in the Proposed Plan.

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No. of comments: 3

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|  |        |          |                                  |
|--|--------|----------|----------------------------------|
| <b>Mr Eric Craig</b>   |        |          | 02395/FLDP_MIR/3001/001          |
| LDISSUE:   | LDMI19 | MIR2/BRS | MIR2 Braes and Rural South Sites |
| <b>Comment:</b>  |        |          |                                  |
| Objects to the potential development of land at Station Road, Polmont (site 136) for housing. Station Road is very narrow at this point and buses and large vehicles cannot pass together. Development here, plus extra station parking, would create traffic safety and congestion problems.  |        |          |                                  |
| <b>Response:</b>   |        |          |                                  |
| The site forms part of the Green Network, and contributes to the setting and rural character of the Union Canal. The access is problematic from Station Road, and would require the culverting and crossing of the burn, which may exacerbate flood risk. Consequently, the site is not identified for development.  |        |          |                                  |
|  |        |          | No. of comments: 1               |
| <b>Mr J K Craig</b>  |        |          | 02249/FLDP_MIR/3001/001          |
| LDISSUE:   | LDMI19 | MIR2/BRS | MIR2 Braes and Rural South Sites |
| <b>Comment:</b>  |        |          |                                  |
| Objects to potential residential development site at Standrigg Road, Wallacestone (site 147). Housing will take up a large area of green belt and adversely impact on wildlife and countryside recreation. Standrigg Road and surrounding area are not built to cope with the huge increase in traffic that will result. Local infrastructure such as schools, GP surgeries, Polmont rail station parking, and electricity supply network cannot support this development. Extensive development in the Braes has been ongoing for some time.  |        |          |                                  |
| <b>Response:</b>   |        |          |                                  |
| The site is not identified for housing development in the Proposed Plan. The site would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. The site also has low accessibility due to it's location in relation to local services, and the issue regarding the provision of a footway along the length of Standrigg Road. |        |          |                                  |
|  |        |          | No. of comments: 1               |
| <b>Craigrossie Properties</b>  |        |          | 00904/FLDP_MIR/3002/002          |
| LDISSUE:   | LDMI17 |          |                                  |
| <b>Comment:</b>  |        |          |                                  |
| Craigrossie Properties do not agree with the preferred option in terms of the housing targets. They consider that the flexibility allowance should be increased to 20% in line with SPP. This would help maintain a 5 year housing land supply.  |        |          |                                  |
| <b>Response:</b>   |        |          |                                  |
| The Proposed Plan has applied a 14% flexibility allowance. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr. This lower target still meets the projected household needs of the Council area identified in the HNDA as 418/yr so at a minimum this would be 4180 for 2020 – 2030.  |        |          |                                  |
| <b>Comment:</b>  |        |          |                                  |
| Craigrossie Properties support the preferred approach for maintaining the 25% affordable housing requirement for Braes and Rural South.  |        |          |                                  |
| <b>Response:</b>   |        |          |                                  |
| Support noted.   |        |          |                                  |

LDISUE: LDMI18

**Comment:**

There has been an over-reliance on large development sites, including Strategic Growth Areas. Craigrossie Properties support the preferred option of de-allocating SGAs/sites at Slamannan, East Bonnybridge, Kilsyth Road, Hags and selected sites in Rural South villages. These sites should be replaced with other effective sites to meet the housing land requirements.

**Response:**

The Proposed Plan provides a range of sites to meet the housing land requirement, and it not considered that there is an over reliance on large sites. A range of sites have been de-allocated in the Proposed Plan, broadly in line with the preferred option in the MIR. East Bonnybridge has, however, been retained, although it does not contribute to the land supply, and Bo'ness Foreshore is an additional de-allocation.

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LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Craigrossie Properties seek the inclusion of the site at Greenwells Farm North (site 138) for housing development of around 90 units. The site is considered effective and deliverable. The site could form a rounding-off of the settlement edge. The development would provide open space, affordable housing and other community benefits. The site is also relatively accessible and sustainable. A masterplan has been prepared for the site.

**Response:**

The site at Greenwells North would represent a western expansion of Maddiston into the countryside. Landscape impacts are potentially significant and would limit the area that could be developed. Education capacity is an issue, although constraint may be overcome through pre-zoning to Wallacestone PS, although this would split the community between two schools. Given the scale of recent and committed growth in Maddiston, further growth is not favoured at this time. The site is therefore not included as a residential allocation in the Proposed Plan.

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No. of comments: 4

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**Ms Susan Crook**

02911/FLDP\_MIR/3001/001

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LDISUE: LDMI15

**Comment:**

Encourage people to take pride in both their local area and the wider district and look after it.

**Response:**

Comment noted.

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LDISUE: LDMI17

**Comment:**

Agrees with reduction in the rate of housing growth.

**Response:**

Support welcomed.

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LDISUE: LDMI21

**Comment:**

There are many properties above retail units in the town centres that could be brought into housing without building any more. Would not like to see the town centres lose their character by the introduction of buildings that were not in keeping with the original buildings.

**Response:**

Comment noted. The Proposed Plan supports the re-use of upper storeys in town centres for residential use.

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LDISUE: LDMI22

**Comment:**

Many of the sites shown on the green travel map would be of interest to many more people if they had their profile raised.

**Response:**

Comment noted.

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LDISUE: LDMI23

**Comment:**

Many of the roads and footpaths in Camelon are in a poor condition. More consideration needs to be given to those travelling by foot, bicycle and public transport.

**Response:**

Comment noted.

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No. of comments: 5

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**Lesley Crozier**

02823/FLDP\_MIR/3002/001

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LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Does not support allocation of non-preferred site at Station Road, Polmont (site 136). The site is a greenfield site, and offers views towards the canal and Erskine Hill. There are also mature trees on site, which should not be felled. The site is also of ecological value. The site is at risk of flooding, and an additional 125 houses would exacerbate parking problems and air pollution at Brightons Cross. It should also be noted that the land adjacent to the proposed entrance to the site is a private lane.

**Response:**

The station Road site is not identified as a housing proposal in the Proposed Plan. The site forms part of the Green Network, and contributes to the setting and rural character of the Union Canal. The access is problematic from Station Road, and would require the culverting and crossing of the burn, which may exacerbate flood risk.

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No. of comments: 1

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**Ms Sinead Currie**

02779/FLDP\_MIR/3001/001

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LDISUE: LDMI16

**Comment:**

In Larbert and Stenhousemuir there should be lighting and cctv on paths and in green space so this can be used by the community in evening times.

**Response:**

The design of footpaths should be appropriate to the location and intended use of the route. Security issues are a consideration in the design process.

---

**Comment:**

In Hill of Kinnaird there needs to be a large green space and community hub/resources. The small play parks offer limited opportunities for older children. A community hub would help keep teenagers entertained and stop damaging property in the estate.

**Response:**

Hill of Kinnaird 2 is identified for mixed use development (housing/business/community) and provides an opportunity to address any shortfall in community uses which are identified in Kinnaird Village.

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LDISUE: [LDMI17](#)

**Comment:**

Agree with reduced housing targets and requirements.

**Response:**

Support noted.

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LDISUE: [LDMI19](#)                      MIR2/LAR      MIR2 Larbert and Stenhousemuir Sites

**Comment:**

Disagree that Hill of Kinnaird 2 (site 094) should be developed for houses. Large green space with a community centre and businesses would be highly beneficial to the area much more than new houses. In so doing the Council prioritises builders and their income rather than building a community.

**Response:**

Hill of Kinnaird 2 is identified as a mixed use site which includes housing as well as business/community in the Proposed Plan. Housing capacity is dependent on the residual shortfall from the originally approved 1700 houses for Kinnaird Village.

LDISUE: [LDMI22](#)

**Comment:**

Houses will not encourage tourism. Consider using spaces for building businesses people will visit (bowling, adventure parks) rather than housing.

**Response:**

The Proposed Plan supports tourism development by focusing on a framework of tourism themes, networks and nodes which can be found in the Spatial Strategy.

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LDISUE: [LDMI23](#)

**Comment:**

Lighting for all paths as well as maintenance so people can use footpaths without being hit by branches or tripping on potholes.

**Response:**

Lighting may not be appropriate on all paths. The design of footpaths should be appropriate to the location and intended use of the route. Security and safety issues are a consideration in the design process.

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**Comment:**

Keep designated roads pedestrianised (eg Hamilton Road Larbert). Pedestrian only roads encourage walking, running, cycling and general physical activity which can improve health and bring communities together.

**Response:**

Comment noted.

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LDISSUE: LDMI24

**Comment:**

Agree with energy options.

**Response:**

Comment noted.

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No. of comments: 8

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**Mr Douglas Dewar**

02893/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

The vision is good, but there must be a limit. You cannot keep destroying our green belt areas.

**Response:**

The vision in the Proposed Plan seeks to strike a balance between growth aspirations and a sustainable future whereby assets and resources are carefully managed for generations to come.

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LDISSUE: LDMI16

**Comment:**

Stirling Road, Forth Valley Royal grounds, Larbert Loch and Larbert Wood areas need to be kept as first class conservation sites.

**Response:**

Comment noted.

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LDISSUE: LDMI17

**Comment:**

Agree with reducing the rate of growth set out in the housing targets and requirements section.

**Response:**

Support noted.

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LDISSUE: LDMI18

**Comment:**

More of the stalled sites should be removed.

**Response:**

The stalled sites which have been carried forward into the Proposed Plan are considered to be effective housing sites capable of being developed in the plan period 2020-30.

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LDISSUE: LDMI19

MIR2/LAR

MIR2 Larbert and Stenhousemuir Sites

**Comment:**

No houses should be built at Stirling Road (site 133). The road cannot handle any more traffic and given ambulances get caught in congestion there are safety implications. Development would impact on the Maggie Centre and Bungalows.

**Response:**

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

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LDISUE: LDMI20

**Comment:**

Agree with approach on major employment sites.

**Response:**

Support noted.

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LDISUE: LDMI21

**Comment:**

Good ideas in MIR's approach to our town centres.

**Response:**

Support noted.

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LDISUE: LDMI22

**Comment:**

Tourism is looking good in the area.

**Response:**

Support noted.

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LDISUE: LDMI23

**Comment:**

Many of the roads in Falkirk are in need of work and a re-think.

**Response:**

The responsibility for roads maintenance is outwith the remit of the local development plan.

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LDISUE: LDMI24

**Comment:**

Agree with energy options outlined in MIR.

**Response:**

Support noted.

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**Comment:**

Definitely no fracking.

**Response:**

Comment noted.

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|   |        |          |                         |
|---|--------|----------|-------------------------|
| <b>Mr George Drummond</b>   |        |          | 02744/FLDP_MIR/3001/001 |
| LDISSUE:  | LDMI19 | MIR2/BNS | MIR2 Bo'ness Sites      |
| <b>Comment:</b>   |        |          |                         |
| Objects to Crawfield Road site (102) due to the fact that it is green belt, bordering a nature reserve, with adverse impacts on environment, wildlife, town centre and town's historic identity. Focus should instead be on redeveloping the Bo'ness Foreshore site for tourism/housing/marina as it is brownfield and will benefit the town centre.  |        |          |                         |
| <b>Response:</b>  |        |          |                         |
| The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release. Bo'ness Foreshore is not considered to an effective site for large scale growth due to constraints, high development costs and viability issues.  |        |          |                         |
|   |        |          | No. of comments: 1      |
| <b>Ms Rhonda Drummond</b>   |        |          | 02743/FLDP_MIR/3001/001 |
| LDISSUE:  | LDMI19 | MIR2/BNS | MIR2 Bo'ness Sites      |
| <b>Comment:</b>   |        |          |                         |
| Objects to allocation of Crawfield Road site (102). Site offers no long term employment opportunities, in contrast to Bo'ness Foreshore which should be pursued instead. Concern expressed about impact on infrastructure, particularly Deanburn PS (capacity and constrained access) and doctor's surgeries. There are numerous brownfield sites in the town which can be used instead. Building on the outskirts of the town threatens the heart of the town. |        |          |                         |
| <b>Response:</b>  |        |          |                         |
| The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.   |        |          |                         |
|   |        |          | No. of comments: 1      |
| <b>Susan Dyer</b>   |        |          | 00469/FLDP_MIR/3001/001 |
| LDISSUE:  | LDI002 |          |                         |
| <b>Comment:</b>   |        |          |                         |
| The vision should aim to make Falkirk a great place to learn as well.   |        |          |                         |
| <b>Response:</b>  |        |          |                         |
| Comment noted. Developments that enhance the Council area's perception as a place to learn (such as new schools, heritage attractions) are generally supported by the Vision, helping to improve sustainability and attractive of a place for living, working, visiting and investing.  |        |          |                         |
| LDISSUE:  | LDMI15 |          |                         |
| <b>Comment:</b>   |        |          |                         |
| It may be helpful to temper expectations as to what can be achieved in a climate of reducing local authority budgets.   |        |          |                         |
| <b>Response:</b>  |        |          |                         |
| LDP2 reflects the positive aspirations of local and national strategies. At the same time, the new plan has taken into account the economic climate when setting expectations for future development across the Falkirk Council area.   |        |          |                         |

LDISSUE: LDMI16

**Comment:**

It would be good to see green network opportunities which looked at imaginative ways of re-using waste materials.

**Response:**

Comment noted.

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LDISSUE: LDMI17

**Comment:**

Reducing the housing targets and requirements doesn't seem wise as there is a national shortage of homes. Will the LDP consider requirements for affordable homes and properly managed rented accommodation?

**Response:**

The Housing Need and Demand Assessment (HNDA) identifies a housing need at 418 homes per year. The Council has increased this to a housing target of 450 homes per year over the period 2020-2030. While this is a reduction from LDP1, the target is higher than the HNDA estimate and more closely reflects current population trends: lower household projections and a general slowdown in household formation. LDP2 requires housing developments of 20 units or more to provide affordable housing provision. This is 25% in Larbert, Stenhousemuir, Rural North, Braes and Rural South and 15% elsewhere. Policy HC03 provides further details.

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LDISSUE: LDMI18

**Comment:**

What is the point of using time and resources on housing sites which have stalled?

**Response:**

Comment noted.

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LDISSUE: LDMI20

**Comment:**

Aiming to diversify the range of business and industry in the area would be a good idea. Are there any plans to specifically target financial services or IT companies?

**Response:**

The Economic Strategy for Falkirk 2015-2025 is the Council's primary strategy for co-ordinating economic development investment across the Falkirk Council area. It outlines a number of general and specific actions to attract businesses to the area. The Proposed Plan supports the strategy by safeguarding key business locations.

LDISSUE: LDMI21

**Comment:**

I would be in favour of actions that brought life and business back to Falkirk Town Centre. Are the business rates too high for smaller businesses?

**Response:**

Comment noted. Business rates, however, are not within the remit of the LDP2.

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LDISSUE: LDMI22

**Comment:**

Providing cafes and restaurants at key sites would encourage more people to visit. Tourist attractions in the Clyde Valley appear to have a much better range of dining facilities for tourists.

**Response:**

Comment noted.

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LDISSUE: LDMI24

**Comment:**

I would like to see more green energy initiatives. Could the council promote its own energy from waste plant or renewable energy developments. This has been done by Nottingham City Council - Robin Hood Energy.

**Response:**

The points raised would be a matter for the Council's Sustainable Development & Climate Change Strategy rather than LDP2.

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No. of comments: 9

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Ellandi LLP

02703/FLDP\_MIR/3002/001

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LDISSUE: LDMI21

**Comment:**

The preferred policy options for Falkirk Town Centre are generally supported, including increased flexibility for changes of use. However, continuing concern is expressed about keeping Central Retail Park (CRP) within the Town Centre boundary. CRP does not have the character of a town centre as defined within SPP, and competes with rather than complements the Town Centre. It should instead be defined as a Commercial Centre, with its function and restrictions specified. The threshold of 1,000 sq.m. in Policy TC02 is considered high and should be reviewed. Retail evidence on which the MIR is based is out of date and a new retail/household study should be commissioned to inform LDP2

**Response:**

Concerns about Central Retail Park's inclusion within the Falkirk Town Centre boundary are acknowledged, and it is accepted that the Retail Park has the character of a commercial centre as defined in SPP. Accordingly, Central Retail Park has been removed from the town centre boundary and classified as a commercial centre in the Proposed Plan.

**Comment:**

Clarification is required as to the type and quantum of retail uses envisaged at this location. The effects of any proposal should be tested through a retail assessment. Expansion of retail uses outwith the Town Centre core should only be considered once existing vacancies/opportunities in the core have been fully addressed.

**Response:**

A range of town centre uses have been identified as being potentially suitable for the Grahamston site in the Proposed Plan including housing, business, leisure, tourism, community and retail. It is not expected that there will be a particular retail focus, or that development here will detract from the retail focus of the town centre core. The site is considered to present an important opportunity for regeneration which will benefit Falkirk Town Centre as a whole.

**Comment:**

The owners of Callendar Square support its inclusion in the Falkirk Town Centre East End redevelopment opportunity (site 71). This will afford wider development opportunities in this location which has traditionally been focused on retail uses.

**Response:**

Support welcomed. Callendar Square is included in the East End development opportunity in the Proposed Plan.

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No. of comments: 3

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|   |  |                         |
|---|--|-------------------------|
| <b>Mr David Erskine</b>   |  | 02880/FLDP_MIR/3001/001 |
| LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites  |  |                         |
| <b>Comment:</b>   |  |                         |
| Consideration should be given to developing land for housing at Greenwells Farm to the west of Shieldhill. There is high demand for housing in the area. A road from the football park to Darnrigg Road would ease congestion at the primary school and the village. The land is not at risk of flooding and is of poor agricultural quality.   |  |                         |
| <b>Response:</b>  |  |                         |
| The representation has not identified the location or extent of the site being proposed, or provided any information to support its promotion as a housing site. It is therefore not possible to assess it as a formal site submission. Provision has been made for a substantial housing site at Hillcrest at the western end of Shieldhill.   |  |                         |
|   |  | No. of comments: 1      |
| <b>Essar Oil (UK) Ltd</b>   |  | 01180/FLDP_MIR/3001/001 |
| LDISUE: LDMI20  |  |                         |
| <b>Comment:</b>   |  |                         |
| The north west ethylene pipeline passes through the proposed development site at Whitecross. Essar would like to be kept informed of progress with the masterplan and consulted as appropriate at key stages. The proposed removal of the Avondale safeguarding site which affects the same pipeline is also noted. Shapefiles of the pipeline route can be provided on request.        |  |                         |
| <b>Response:</b>  |  |                         |
| The comments are noted.   |  |                         |
|   |  | No. of comments: 1      |
| <b>Falkirk Community Trust</b>  |  | 01077/FLDP_MIR/3001/002 |
| LDISUE: LDMI15  |  |                         |
| <b>Comment:</b>   |  |                         |
| Need clarity on the interface between spatial planning and locality planning. Welcome closer linkage to six qualities of successful places. There is considerable activity and focus across community planning partners on engaging communities in locality planning and the LDP could articulate the opportunity to embed the placemaking agenda within the locality planning process. |  |                         |
| <b>Response:</b>  |  |                         |
| Comment noted. Stronger links are developing between spatial and community planning. However, the differing timescales of the LDP and the locality plans make alignment difficult.  |  |                         |
| LDISUE: LDMI16  |  |                         |
| <b>Comment:</b>   |  |                         |
| Support proposals for the green network, including inclusion of Helix, Callendar House/Park, Kinneil Estate and Muiravonside as tourism nodes. Highlight the importance of supporting infrastructure to the green network (e.G. Car parking, public transport, visitor amenities). LDP could be more explicit in supporting these types of development and services.                    |  |                         |
| <b>Response:</b>  |  |                         |
| Comment noted.  |  |                         |

LDISUE: LDMI20                      MIR2/FAL      MIR2 Falkirk Sites

**Comment:**

Note the preferred option for the Falkirk Gateway/Falkirk Stadium (sites 80 and 81) and support the vision for the site. Reference to recreation on the site should be widened to culture. Mix of development should not be overly weighted to food and drink due to potential impact on on-site trading within Helix.

**Response:**

Comment noted. Cultural development would not be precluded from the mix. Food and drink is also expected to an important component of new development but is expected to be complementary to existing outlets.

LDISUE: LDMI22                      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Appropriate development at the walled garden would be welcomed. It is identified as development opportunity within the Kinneil Estate masterplan.

**Response:**

Support welcomed.

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LDISUE: LDMI23

**Comment:**

ECT and Council will collectively need to consider the implications for future provision of culture and sport services, particularly in areas of significant growth. There is a need for connection between the LDP and the Council's ongoing strategic asset review which is seeking to determine the future asset needs for all services including culture and sport.

**Response:**

Comment noted.

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No. of comments: 5

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**Falkirk Towns Ltd**

00605/FLDP\_MIR/3001/001

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LDISUE: LDI002

**Comment:**

Vision is positive and supportive but needs more focus on Falkirk Town Centre as an economic driver facing shift change challenges.

**Response:**

Comment noted. The Proposed Plan has a significant focus on Falkirk Town Centre, identifying it as a major area of change with significant development opportunities. The Plan adopts the Scottish Government's town centre first principle, preferring urban centres, such as Falkirk Town Centre, as the first choice location for new significant footfall uses.

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LDISUE: LDMI19

**Comment:**

Mention of the Town Centre as a location for growth and the emphasis on town centre living is welcomed.

**Response:**

Support welcomed.

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LDISSUE: LDMI20

**Comment:**

Removal of Falkirk Gateway as a commercial centre in the network of centres is welcomed.

**Response:**

Support welcomed.

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LDISSUE: LDMI21

**Comment:**

The preferred policy options for Falkirk Town Centre are generally supported, including increased flexibility for changes of use, promotion of the East End opportunity, and support for building of more homes in the Town Centre. However, continuing concern is expressed about keeping Central Retail Park (CRP) within the Town Centre boundary. CRP does not have the character of a town centre as defined within SPP, and competes with the Town Centre. There is the potential for further adverse impacts/relocations. It should instead be defined as a Commercial Centre, with its function and restrictions specified. The threshold of 1,000 sq.m. in Policy TC02 is considered high and should be reviewed. Retail evidence on which the MIR is based is out of date and a new retail/household study should be commissioned to inform LDP2.

**Response:**

Concerns about Central Retail Park's inclusion within the Falkirk Town Centre boundary are acknowledged, and it is accepted that the Retail Park has the character of a commercial centre as defined in SPP. Accordingly, Central Retail Park has been removed from the town centre boundary and classified as a commercial centre in the Proposed Plan. The 1,000 sq.M. Threshold is considered appropriate to allow a meaningful and viable level of convenience provision in neighbourhoods. In terms of retail data, Town Centre health checks were carried out in 2016, and this information is reflected in Technical Report 7 : Town Centres and Retailing. A full floorspace survey was carried out in 2014. Household surveys are resource intensive and are only generally carried out at 10 year intervals.

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**Comment:**

Clarification is required as to the type and quantum of retail uses envisaged at the Grahamston opportunity. The effects of any proposal should be tested through a retail assessment. Expansion of retail uses outwith the Town Centre core should only be considered once existing vacancies/opportunities in the core have been fully addressed.

**Response:**

A range of town centre uses have been identified as being potentially suitable for the Grahamston site in the Proposed Plan including housing, business, leisure, tourism, community and retail. It is not expected that there will be a particular retail focus, or that development here will detract from the retail focus of the town centre core. The site is considered to present an important opportunity for regeneration which will benefit Falkirk Town Centre as a whole.

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LDISSUE: LDMI22

**Comment:**

Disappointing that Falkirk and Bo'ness Town Centres are not featured as central points linking the area's tourism attractions. Scope for additional visitor facilities should be included in LDP2.

**Response:**

Falkirk and Bo'ness Town Centres are identified as tourism nodes in the Proposed Plan, and the tourism role of these centres is clearly highlighted and supported.

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LDISSUE: LDMI23

**Comment:**

Work should be commissioned to investigate the infrastructure requirements of the now dated traffic system in and around Falkirk Town Centre.

**Response:**

Comment noted. Although there are no current plans for such a review, it is likely that decisions on re-provisioning of the Council HQ within the Town Centre will lead to assessment of transport network issues and options in and around the Town Centre.

No. of comments: 7

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Mr Tim Flett

02909/FLDP\_MIR/3002/001

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LDISSUE: LDI002

**Comment:**

The vision is generally supported however objectives in relation to housing, economic development and tourism in the Grangemouth area could be strengthened.

**Response:**

The support for the Vision is noted. Specific proposals for Grangemouth are highlighted elsewhere in the plan with one housing development and continued support for industrial growth. Support for the redevelopment of the town centre and for the enhancement of Zetland Park is also identified.

LDISSUE: LDMI17

**Comment:**

The Housing Land Audit which shows an effective housing land supply cannot deliver 4,025 houses required over 2020-30 as many of the sites are ineffective and stalled.

**Response:**

The estimated output from existing sites in the Proposed Plan is 4,133. This is derived from the 2016/17 HLA, with further adjustments to take account of constrained sites.

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**Comment:**

There is an overreliance on windfall sites.

**Response:**

The windfall allowance is considered reasonable, and reflects an analysis of past trends.

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**Comment:**

New allocations in the range of 3,000 units need to be made as part of the LDP2.

**Response:**

The total allocations contained in the Proposed Plan, amounting to 4,614 units, together with the windfall allowance, provide sufficient housing land to meet the housing land requirement

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**Comment:**

Support a more generous flexibility allowance (4.07). 15% is unacceptable and will constrain the delivery of a generous supply of housebuilding for both market and affordable housing.

**Response:**

The flexibility allowance is 14% in the Proposed Plan, which is within the range of 10-20% specified in SPP. This is considered to be an appropriate level of flexibility for the area.

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**Comment:**

The vision for 2020-2030 is agreed with particularly in relation to housing development. However the distribution of sites across the strategic growth areas and other allocations in the housing market area is not supported.

**Response:**

New housing allocations reflect areas with capacity for further growth which are also considered marketable locations. Grangemouth is constrained because of the major hazard sites, flooding and its location between the M9, River Carron and the Forth.

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LDISSUE: LDMI18                      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Support alternative outlined in paragraph 4.16 and de-allocation of Bo'ness Foreshore (site 63).

**Response:**

Support noted. Bo'ness Foreshore (site 63) has been de-allocated in the Proposed Plan.

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**Comment:**

Support alternative outlined in paragraph 4.16 and de-allocation of Whitecross (site 76).

**Response:**

The Whitecross proposal (site 76) has been subject to further review. Infrastructure constraints, land assembly issues and market considerations have led to a revised vision in the plan, with housing significantly reduced in scale. It now comprises two separate sites for business/industry on the former Manuel Works (BUS02) and housing on land west of Whitecross (H29).

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LDISSUE: LDMI19

**Comment:**

Grangemouth is a constrained area for housing allocations and the site at Glensburgh (088) could address this issue. Objection is made to; the housing supply target (Fig. 4.2) and housing land requirement and a more generous flexibility allowance would be supported; the proposed distribution of housing allocations by settlement (Fig. 4.4); the preferred spatial strategy (Fig 4.5); Grangemouth preferred option (Para. 4.46); Tourism Nodes and Opportunities (Fig. 5.6); Spatial Strategy Jobs and Economy (Fig 5.7) and Appendix 1 Site Schedules Grangemouth.

**Response:**

The site at Glensburgh is in the ownership of the Council apart from a small area next to the motorway and is allocated for business and industry. The housing land target is derived from the Housing Need and Demand Assessment (HNDA) and reflects current projected population and household growth. A review of existing land supply has been undertaken and the housing land requirement includes a flexibility allowance of 14%.

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**Comment:**

The growth in tourism in the area is welcomed and the site at Glensburgh (088) should be retained in LDP2 for mixed use including residential and tourism. There is an over supply of employment land in the area. Glensburgh can support improvements in townscape quality, the green network (linking into the Helix) and housing development and a development brief should be prepared. Objection is made to the preferred option in the MIR (paragraph 5.48, Fig. 5.6) which is too prescriptive and alternative sites should be identified to allow greater flexibility and potential for tourism growth.

**Response:**

The plan identifies a number of tourism networks and nodes and Policy JE01 supports tourism development across the Council area. The Council owned Glensburgh site is considered an appropriate location for business and industry.

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**Comment:**

There is no justification for Newton Avenue South (Site 165) to be allocated in advance of Newton Avenue North (Site 153).

**Response:**

Neither site has been identified as housing proposals in the Proposed Plan. Potential flood risk issues, combined with high development costs, and uncertain marketability suggest neither site is likely to be effective.

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**Comment:**

Seeks inclusion of Newton Avenue North Skinflats (site 153) in LDP2. It forms back land development close to the Primary School and related village facilities and is much more accessible than the Council's own site (165) which they have allocated for housing.

**Response:**

The site has not been identified as a proposal in the Proposed Plan. Potential flood risk and access issues, combined with high development costs and uncertain marketability suggest the site is unlikely to be effective. The site at Newton Avenue South (203) has likewise not been allocated due to flood risk concerns.

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LDISSUE: [LDMI20](#)

**Comment:**

Glensburgh (088) is not a viable business location with other sites better located. Business and housing sites should be aligned as closely as possible to reduce commuting. There is a gross over supply of employment land and key sites should be reviewed. Residential is being considered at Falkirk Investment Zone, Larbert Gateway and the Eastern Gateway. The Council should review existing allocations before permitting residential use in key strategic employment zones.

**Response:**

The plan allows some flexibility in business locations where appropriate. However Glensburgh is considered to be an appropriate location for business and industry rather than tourism or residential uses. Additional housing elements at a number of Strategic Growth Area locations has been included in the Plan and it is considered that the amount of business land retained is adequate.

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No. of comments: 13

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**Ms Jennifer Forsyth**

02903/FLDP\_MIR/3001/001

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LDISSUE: [LDI002](#)

**Comment:**

Agree with vision and welcome the focus on greenspaces which are key to keeping the character of the area.

**Response:**

Support noted.

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LDISSUE: [LDMI15](#)

**Comment:**

The focus must be on creating services at the heart of any large development and ensuring suitable contributions are secured from developers. Otherwise the area is in danger of becoming a dormitory for commuters.

**Response:**

The Proposed Plan includes mechanisms for ensuring appropriate infrastructure is delivered alongside major residential development. However, the provision of commercial services such as retail and business will be market dependent.

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LDISUE: LDMI16

**Comment:**

The preservation of the grounds of Forth Valley Hospital and Larbert Woods is essential. It is of great importance to the area, an opportunity to encourage healthy living and a resource for children.

**Response:**

The grounds of FVRH are subject to various designations and policies in the Proposed Plan which would offer protection from development which would adversely impact on the character or function of the site.

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LDISUE: LDMI17

**Comment:**

Agree with reduced rate of growth, area has absorbed a tremendous amount of houses and services are under pressure. Focus should move from housebuilding until services are improved.

**Response:**

Support noted.

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LDISUE: LDMI18

**Comment:**

Where any stalled sites are green sites and are not entirely necessary they should be removed.

**Response:**

Stalled sites have been subject to further review to determine whether they should be de-allocated or not. A number of factors have informed these decisions, but the chief determinant is whether they are capable of being delivered in the plan period.

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LDISUE: LDMI19

**Comment:**

Preference is for as little housing as possible in Larbert, as the area is under stress with the amount of housing that has been built. If Larbert is to absorb any housing the business park would be the best place for it.

**Response:**

Larbert and Stenhousemuir is identified as a settlement with low growth potential. There is only one additional housing opportunity at Hill of Kinnaird 2 (MU19) which is identified for mixed use development. Site capacity will be dependent on any residual shortfall from the original approved 1700 houses for Kinnaird Village.

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LDISUE: LDMI20

**Comment:**

Avoid allocating all potential employment sites to housing. The area (Larbert) is becoming a dormitory for commuters and MIR policy may exacerbate issue.

**Response:**

There is a generous supply of employment land in Larbert and Stenhousemuir. Glenbervie and Glenbervie / Central Business Parks are carried forward as business/industry allocations. The only exception is at Hill of Kinnaird 2, where the business site has been amended to also include housing/community uses. The housing capacity will be dependent on any residual shortfall from the originally approved 1700 houses for Kinnaird Village.

LDISSUE: LDMI22

**Comment:**

Agree with the approach taken on town centres.

**Response:**

Support noted.

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**Comment:**

Pineapple at Dunmore seems an under-utilised tourism opportunity.

**Response:**

Comment noted.

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LDISSUE: LDMI23

**Comment:**

A lot of new estates are soulless with no real centre or amenities. These areas should be re-evaluated. Kinnaird village given as an example.

**Response:**

The Proposed Plan can allocate land for retail, business etc but the take up of such commercial uses is market dependent. Kinnaird Village does have a recognisable centre with a school and shops.

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LDISSUE: LDMI24

**Comment:**

Agree with energy options. Onshore wind and solar panels on public buildings should also be considered.

**Response:**

Comment noted.

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LDISSUE: LDMI25

**Comment:**

Fracking of any description should not be allowed within the area. Falkirk should refocus on renewables and move away as much as possible from its reliance on fossil fuels.

**Response:**

The Proposed Plan contains policies on onshore oil and gas extraction as required by Scottish Planning Policy. In the meantime, the Scottish Government's moratorium on unconventional oil and gas extraction remains. The Proposed Plan also contains policies which are supportive of renewable energy.

No. of comments: 12

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**Forth Ports Limited**

00020/FLDP\_MIR/3002/001

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LDISSUE: LDMI16

**Comment:**

The Key Green Network Corridor identified in Fig. 3.3 crosses the docks however no public access is possible in this area and operational port land should be excluded from the network. The Green Network also includes the Firth of Forth SPA which does not need any further protection.

**Response:**

The Green Network corridors are identified to indicate potential corridors which could include habitat and species routes and not necessarily routes with public access.

LDISSUE: LDMI20      MIR2/GRA      MIR2 Grangemouth Sites

**Comment:**

The preferred new business sites are welcomed including the allocation of land for a thermal power station north of Beach Road and the consented renewable energy plant site at Central Dock Road. The allocations should include other forms of port and energy related development.

**Response:**

The allocation at Grangemouth Docks West (BUS15) includes the consented site for a biomass energy from waste plant. The preferred sites identified in the MIR 128, 162 and 163 to the north east of the Docks have not been taken forward as proposed sites into LDP2. Site 128 is already within the identified business and industry area and the urban boundary includes Site 162. The urban boundary has also been extended to include Site 163. Given the site locations on the north west boundary of the Docks and proximity to the Firth of Forth SPA, their exclusion from the Flood Prevention Scheme boundaries as undeveloped land and access issues they are not allocated in the Plan.

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LDISSUE: LDMI23

**Comment:**

Proposals for the Grangemouth Flood Protection Scheme which affect the Port should be discussed with Forth Ports before the proposed plan is published. The use of Tax Incremental Funding is welcomed and developer contributions should only be used where there is an impact on flood risk. Forth Ports should also not be expected to fund the scheme by virtue of proximity alone. A broad range of funding sources for infrastructure is also supported. Early consultation on supplementary guidance is required and infrastructure such as primary health care or proposals with wider public benefit should not be funded in this way.

**Response:**

The comments are noted.

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LDISSUE: LDMI24

**Comment:**

The allocation of the site with consent for a renewable energy plant is welcomed. The proposed consolidated energy policy is cautiously welcomed and Forth Ports would appreciate an opportunity to discuss the policy which could impact on development in the port. Further information is required on how sites will be future proofed for district heating and further details of the policy should be provided prior to the proposed plan publication.

**Response:**

A new energy policy sets out the criteria for the assessment of all proposals for energy development. There is also a policy on heat networks which includes a requirement to future proof sites where a heat network connection is not currently feasible.

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No. of comments: 4

**Forth Valley College**

00592/FLDP\_MIR/3001/003

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LDISSUE: LDI002

**Comment:**

The vision is supported. The delivery of the new Forth Valley College campus, and the redevelopment of the surplus brownfield land, will contribute to the aims set out in the vision.

**Response:**

Support welcomed.

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LDISUE: LDMI18      MIR2/FAL      MIR2 Falkirk Sites

**Comment:**

The intention to carry forward LDP1 site H32 (Grangemouth Road, Falkirk) is noted and the change in boundary is supported. This should be reflected in LDP2. Suggest the capacity of the site be increased to 230 units, this being the likely upper level of dwellings the site could accommodate, based on a density range of 25-35 per hectare. This would ensure efficient use of a brownfield site. Arbitrary retention of the playing field rather than comprehensive masterplanning incorporating open space is questioned, given close proximity to Victoria Park.

**Response:**

The site is carried forward into the Proposed Plan, and the capacity of the site has been amended to 200, which is considered a reasonable estimate of capacity pending a full masterplanning exercise. It is considered that the playing field should be retained as open space, and accordingly, it is removed from the site boundary.

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LDISUE: LDMI20

**Comment:**

Identification of the the new Forth Valley College campus within the Falkirk Investment Zone is supported. However, the allocation in LDP2 should refer to the campus and the consented uses (education and arts, with ancillary commercial uses).

**Response:**

The proposal for the new college campus reflects the planning consent, i.E. Education use. An arts centre is no longer part of the project. The new campus is now under construction.

No. of comments: 3

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**Frank and Birgitta Fortune**

00907/FLDP\_MIR/3001/001

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LDISUE: LDI002

**Comment:**

The vision seems reasonable. The focus on greenspaces is welcome

**Response:**

Support noted.

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LDISUE: LDMI16

**Comment:**

Maintain green spaces and green belt in and around the Wallacestone and Sunnyside Road area. The existing field boundaries are well used by wildlife. Help to revitalise the hedgerows and maintain and improve the biodiversity would be welcome. More cycle routes and footpaths would be welcome across the board, allowing better connectivity and reducing need to use roads, and promoting tourism.

**Response:**

The Proposed Plan does not include any housing sites within the Wallacestone and Sunnyside Road area due to concerns regarding road network capacity, road safety and overall accesibility. Policies in the Proposed Plan seek to encourage the provision of outdoor access and active travel modes in conjunction with new development. The Falkirk Open Space Strategy and the Core Path Plan set out the main priorities for improvement.

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LDISSUE: LDMI17

**Comment:**

Reducing the rate of growth is sensible, and focus should be given to revitalising derelict and brownfield areas, rather than allowing building in green field or green belt areas.

**Response:**

Comment noted. The Proposed Plan seeks to provide a range of sites to meet the housing land requirement. The Proposed Plan includes a number of sites with delivery challenges (often on previously developed land), such as contamination or infrastructure requirements. A full assessment of the effectiveness and deliverability of all sites has been undertaken for the Proposed Plan.

LDISSUE: LDMI18

**Comment:**

Stalled sites should not be removed. Stalling reflects the preference of developers for greenfield and rural locations, where greater profit can be made. If stalled sites are removed, then brownfield sites will never get revitalised.

**Response:**

The Council has re-assessed a number of stalled sites as part of LDP2. Technical Report 3 provides further detail in relation to stalled sites across the Council area. The Council is also keen to assist in delivering stalled sites through innovative funding mechanisms such as the Housing Infrastructure Fund, which can be used to unlock the potential for large sites subject to a range of constraints.

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LDISSUE: LDMI19

**Comment:**

The level of development planned for Maddiston, Brightons and the Braes area is about right. There is limited capacity within the infrastructure and environment for more.

**Response:**

Comment noted.

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**Comment:**

Objects to the potential development at Standrigg Road, Brightons (site 221) and agree with the reasons why it is not proposed for development in the MIR, i.e. Road safety, infrastructure and biodiversity.

**Response:**

Objection noted. Standrigg Road (Site 221) site would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. The site is therefore not identified for housing development in the Proposed Plan.

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LDISSUE: LDMI21

**Comment:**

Agree with the focus on bringing premises in Falkirk Town Centre back into use to bring back life into the town.

**Response:**

Support noted.

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LDISUE: LDMI23

**Comment:**

Agrees with the focus on new paths and cycle routes.

**Response:**

Support noted.

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LDISUE: LDMI24

**Comment:**

Questions the need for a power station in Grangemouth. Carbon capture is likely to prove uneconomic. Strong focus on renewable energy and energy efficiency is welcomed. A flexible, dispersed power generation approach through wind and solar, as well as investigation of ground source heat and marine heat sources for district heat should be taken.

**Response:**

The Vision, policies and Spatial Strategy in the Proposed Plan support the development of a renewable and low-carbon economy. The Proposed Plan reflect NPF3, which identified a site in Grangemouth for Carbon Capture, subject to detailed feasibility work. There is also current planning consent for a Biomass plant in Grangemouth. The main focus of delivery of heat works continues to be around Grangemouth, although other opportunities may arise elsewhere. Falkirk Council will be preparing a Local Heat and Energy Efficiency Action Plan (LHEES). Supplementary Guidance on Low and Zero-Carbon Development will also be prepared under LDP2.

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LDISUE: LDMI25

**Comment:**

Society should be moving away from fossil fuels. The safety of fracking is not proven and poses a risk to the community and the environment. Waste management is important and Falkirk has done well to improve recycling. However, Falkirk should not aim to be the receivers of waste that others do not deal with in their area.

**Response:**

The Proposed Plan sets out the criteria which mineral proposals (including onshore oil and gas) must meet to address concerns on the environment, infrastructure and communities. Notwithstanding this, the Scottish Governments policy position resisting the development of unconventional oil and gas remains in place. The Proposed Plan removes the safeguarding of a site for the extension of Avondale landfill site, rather than proposing any reduction in environmental protection. This is in line with the national Zero Waste Plan, which reflect the reduced requirement for landfill capacity regionally and nationally.

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No. of comments: 10

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**Mr Kenneth Gardiner**

02745/FLDP\_MIR/3001/001

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LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Slamannan Road 2 (site 054) should be extended to include further land to the north and west. Other allocations in the village have not come forward and identification of this wider site would benefit the village.

**Response:**

The extension of Slamannan Road 2 is not supported in the Proposed Plan. It would extend the current brownfield allocation into greenfield land. It does not represent a good fit with the existing settlement form. Existing allocated sites in the village have remained undeveloped due to low market demand, so there is no justification for increasing the size of the site.

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No. of comments: 1

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LDISUE: LDMI17**Comment:**

Disagrees with reduction in annual housing target to 480 homes. Target should be maintained at 675, or at the very least the flexibility should be increased to 20%. Target should not be based on past housing completions, which are not an accurate indicator of demand or needs but are a reflection of other factors such as over concentration on large sites, lack of smaller sites, insufficient range and choice of deliverable housing sites, and lack of housing output from smaller builders. More sites should be allocated, especially smaller sites such as Slamannan Road, Falkirk, to support local builders.

**Response:**

The housing supply target has been set at 450 houses per annum in the Proposed Plan. This is an increase on the figure in the HNDA and the reduction in the projected rate of household growth. It is not based on current levels of completions, although current completions do provide some additional evidence that the target is realistic and achievable. The level of flexibility is set at 14%. The Proposed Plan provides a good range of sites, in terms of size, type and location.

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LDISUE: LDMI18

**Comment:**

Agrees that action is needed on all stalled sites. Examination of deliverability should be thorough, possibly with a format agreed with Homes for Scotland and conducted in advance of the Proposed Plan, allowing replacement sites to be allocated.

**Response:**

The existing land supply has been subjected to a rigorous appraisal, and sites which are not considered deliverable in the initial 10 year period of the plan have been removed from the supply, or de-allocated altogether.

LDISUE: LDMI19

**Comment:**

Reduction in the housing land allocation for the Falkirk settlement area is criticised given its status as the sub-regional centre. It is a more sustainable location for housing than other settlements. More sites in Falkirk, such as Slammanan Road (site 120) should be allocated.

**Response:**

1,073 units have been allocated for the Falkirk settlement area, which is the highest of all the settlement areas, and is considered a generous level of growth reflecting its status as the principal town in the Council area.

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**Comment:**

Seeks allocation of site at Slamannan Road, Falkirk (site 120) for housing (19 units), and reconsideration of its non-preferred status in MIR. Site meets the criteria for effectiveness and would improve housing choice in the area, with no serious impact on the local community and local infrastructure. Proposed new open space and footpaths will bring benefits. Landscape, biodiversity, flood risk, and cultural heritage issues can be overcome through suitable mitigation and further investigation.

**Response:**

The site at Slamannan Road has not been identified as a proposal in the Proposed Plan. The site forms part of a green corridor along the Union Canal which is of ecological value as well as providing a rural setting for the canal at this location. Notwithstanding the mitigation proposed, there are likely to be adverse visual and ecological impacts.

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LDISUE: [LDMI19](#) MIR2/RURN MIR2 Rural North Sites**Comment:**

Support for the inclusion of low rise housing and visitor centre at Main Farm Airth (site 148). Promoter would agree to a legally binding occupancy restriction to over 55 yrs removing any adverse impact on school roles. Visitor centre will enhance tourist potential in the area and provide jobs.

**Response:**

The site is not identified as a mixed use proposal in the Proposed Plan. There are potential significant landscape impacts, education capacity constraints, and access difficulties. Given the level of past growth, and existing allocations in the village, further significant expansion of Airth is not favoured.

No. of comments: 1

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**Ms Donna Gillooly**01184/FLDP\_MIR/3001/001

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LDISUE: [LDMI19](#)**Comment:**

There should be no release of green belt land for housing in Bo'ness. Greenspaces should be left alone and not built upon. Demand is from people moving from Edinburgh who will bring nothing to the community. There are not the amenities to support 550 new houses in the town, and no jobs in the local area.

**Response:**

No release of green belt land for housing is now proposed in the Proposed Plan. The site at Crawfield Road has not been allocated as a housing proposal due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

LDISUE: [LDMI23](#)**Comment:**

Upgrading of M9 Junction 3 would ease traffic on the Bo'ness Road, and would be beneficial if the road through Ineos is to close.

**Response:**

Land to implement an upgrade of M9 Junction 3 is safeguarded in the Proposed Plan. Delivery will, however, be dependent on developer funding.

No. of comments: 2

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**Gladman Developments Ltd**01258/FLDP\_MIR/3001/002

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LDISUE: [LDI002](#)**Comment:**

Supports overall vision and objectives of the LDP and the selective focus on areas for change rather than a wholesale revision to the plan.

**Response:**

Support noted.

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**Comment:**

Gladman are concerned that the HNDA is effectively based on data from a recessionary period, and may not accurately reflect the housing needs and demands arising in the area during a period of economic recovery and growth. The Council should have used figures from the 2014-based household projections (available from January 2017). Whilst this would have led to a degree of delay to LDP2, it would have ensured up-to-date figures and accurate projections. Gladman consider that increasing the range and choice of housing sites available would mean that Falkirk is better able to respond to, and enable, greater economic recovery and growth. Gladman note there there is a reduction in the housing targets beyond LDP1. However, Gladman are pleased that the Council has properly embraced the SPP requirement for the HST to be increased by a margin of generosity, to calculate the HLR and that the Council has justified that figure, although there should be additional allocations beyond those set out in the MIR. A large proportion of the completions in Falkirk have come from large sites, the majority of which will be built out by the time LDP2 is adopted.

**Response:**

The HNDA identified housing need at 418/yr and we have increased this to a housing target of 450/yr. The flexibility allowance in the Proposed Plan is 14%. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr. This lower target still meets the projected household needs of the Council area identified in the HNDA as 418/yr so at a minimum this would be 4180 for 2020 – 2030. The supply gives 25% flexibility from base HNDA figure.

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**Comment:**

Concerned that the HNDA is based on data from a recessionary period, and may not reflect the housing needs and demands arising in the area during a period of economic recovery. It is unfortunate that the Council did not wait for the 2014 household projections and produce the HNDA on the basis of these figures.

**Response:**

The HNDA was dated May 2016 and has been declared robust and credible by the Centre for Housing Market Analysis. The 2014 household projections do not make any significant changes to the 2012 projections used in the HNDA, and in fact the Council's household projections are slightly higher to 2040 than projected in the 2014 figures.

**Comment:**

It is unfortunate that the overall housing land supply is a reduction from LDP1 and it is questioned whether this approach is the best way for the Council to achieve its Vision. The number of new housing allocations should be increased over and above the MIR to provide a range and choice of sites and ensure Falkirk can meet its growth aspirations.

**Response:**

The reduction in the housing supply target reflects the HNDA and the projected reduction in the rate of household growth within the area. The growth contained in the Proposed Plan remains substantial, and is commensurate with the Council's vision

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**Comment:**

The Council must ensure that its housing land requirement is sufficiently generous to allow the identified housing needs to be met.

**Response:**

Both existing and new allocated sites offer sufficient scale and flexibility of supply to meet the housing targets. In addition should there be a housing shortfall during the plan period, additional sites may be considered where they meet the criteria set out in Policy HC01.

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**Comment:**

The Council's preferred approach to focus the majority of new homes in the Bo'ness area and taking a position of low growth for Larbert is opposed.

**Response:**

The Proposed Plan spreads growth across the Council area, having regard to infrastructure and other constraints. Bo'ness accounts for only 10% of allocations which is not considered disproportionate. Larbert/Stenhousemuir has a relatively low level of allocations, reflecting education and other constraints which have arisen from a prolonged period of high growth over recent years.

**Comment:**

The Council's concerns regarding the delivery of infrastructure are noted. However the education capacity situation in Larbert is overstated and the Council should remove sweeping statements and negative presumptive text relating to their views on the viability of development.

**Response:**

The capacity issues at Larbert HS are well known and documented. In the absence of a satisfactory and deliverable solution to these issues, it would be inappropriate to promote further significant growth in this settlement.

**Comment:**

Gladman seek the allocation of a site at Standrigg Road 2 (site 221), including open space and associated infrastructure. The site is considered to be effective and deliverable, and would integrate successfully with the settlement.

**Response:**

The site is not identified as a housing proposal in the Proposal Plan. The site would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. There would be visual and landscape impacts, and the local transport infrastructure is substandard.

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**Comment:**

Gladman support the current allocations at Maddiston East SGA, and additionally, are seeking the inclusion of a site at Parkhall Farm North-west for housing (Site 189). The site would make a significant contribution to the housing land supply, and can be considered effective and deliverable. The site would also assist in delivering the Council's preferred access strategy. The site would also contribute to the extension of Maddiston Primary School. Documents submitted under application P/14/0707/PPP demonstrate how the site can be brought forward.

**Response:**

The site would be a substantial greenfield expansion, with significant landscape issues given the presence of the ridgeline and the elevated nature of parts of the site. There is no available capacity at Maddiston PS over and above existing and proposed allocations. Access issues would require to be resolved, in the context of the wider Maddiston East area. Consequently, the site is not included as a residential allocation in the Proposed Plan.

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**Comment:**

Promotes site at Stirling Road (site 133) within the RSNH site for housing (60 units). It offers a sustainable location, is of a modest scale and offers incremental growth in keeping with the pattern of development in this area. It is an effective site and has attracted strong housebuilder interest.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. Development would lead to the loss of prime quality agricultural land and would impact on the setting of category B listed Larbert House/Stables and the Larbert House estate non-inventory designed landscape. Capacity constraints at Larbert High School mean that further housing growth in Larbert/Stenhousemuir is not supported.

LDISUE: LDI002

**Comment:**

While the vision is acceptable how will it be achieved for Grangemouth. Dominance of industry and the potential for community growth is limited by this and future development. NPF3 identifies a range of industrial development in the area and these proposals fail our community in terms of the Scottish Government Strategy for Scotland criteria. Cumulative impact as defined in NPF3 needs to be taken into account. Weatherier - wealth created will go elsewhere, seen in decline of town centre and increased SIMD areas. Fairer - one community is burdened with the impact of the drive for economic growth. Smarter - question the move to dependence on a historically volatile industry. Healthier - major industry has side affects and mitigation is not fool proof. Safer - Despite regulation and mitigation the expansion of major hazard industries is unlikely to make our community safer. Stronger - how is this possible. This community carries a burden on behalf of the wider local and national community. Greener - Difficult when there are proposals for fossil fuel based industry and freight distribution and associated polluting traffic.

**Response:**

The vision identifies the objective of building sustainable attractive communities. The Plan also recognises that there are difficulties in balancing the need for economic growth with the impact on particular communities such as Grangemouth.

LDISUE: LDMI15

**Comment:**

Support the principle of placemaking statements. To strengthen their status they should not be supplementary guidance but be a material consideration for planning purposes.

**Response:**

The concept of place statements is not taken forward into the Proposed Plan. There is a danger of confusion and overlap with local place plans which are being proposed through the Planning Bill. Instead placemaking is supported through Policies PE01 and PE02.

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LDISUE: LDMI16

**Comment:**

Completion of the Helix network missing link between the bottom of Icehouse Brae along Laurieston Road to join the stadium path network should be progressed. This would encourage people to access the Helix by active travel.

**Response:**

Some improvements to pedestrian access along Laurieston Road will be made with the proposed road realignment between Icehouse Brae/Laurieston Road and the entrance to WH Malcolms under IN06 with a footway being constructed on the east of the re-aligned road. This will improve access to the pedestrian route along the south side of the stadium. Further opportunities for enhanced pedestrian provision will be considered.

LDISUE: LDMI17

**Comment:**

Generally the scale and location of housing development should be matched to available infrastructure.

**Response:**

The comments are noted.

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LDISSUE: LDMI19

**Comment:**

Dated housing stock should be demolished and rebuilt or modernised. Failure to do this will impact on the community demographic and social profile. If people's housing needs change they should be able to access a choice of homes in their community rather than having to move away. A wider choice of homes close to major job opportunities could reduce increasing commuting traffic in and out of Grangemouth. Reduction in traffic movements could also alleviate problems on the wider road network and improve air quality.

**Response:**

While there are no planned demolitions at present it is acknowledged that this has been carried out in the past with replacement housing and the housing calculations acknowledge the potential for demolitions to occur during the lifetime of LDP2. The potential for further housing in Grangemouth to reduce commuting traffic is noted.

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LDISSUE: LDMI20

**Comment:**

Concerned about cumulative impact, Grangemouth is reaching saturation point. Not enough emphasis on environmental impact of potential development. Regulation and mitigation does not always resolve issues. There have been issues with air quality and noise pollution and odour problems from industrial processes continue to cause problems. Some improvements have been made however recent consents for CHP plants could bring the community close to safe environmental thresholds. New proposals at Ineos and in the Docks provide no confidence that community interests are being met in terms of health and well being.

**Response:**

The need to address community concerns alongside support for business development is noted. The Proposed Plan recognises that development sites may require mitigation from transport impacts and that environmental impacts should be taken into account. The plan recognises that cumulative impact on sensitive receptors, the wider town and local community should be addressed including increases in air pollution, noise and road network impacts.

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LDISSUE: LDMI21

**Comment:**

Town centre retailing is under pressure and a more flexible approach to their development would be welcomed as a means of reinvigoration.

**Response:**

The Proposed Plan supports the redevelopment of town centres and includes policy support for housing development in town centres.

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LDISSUE: LDMI22

**Comment:**

Existing tourism assets should not be threatened by development. Proposals for unconventional oil and gas could create a negative impact on the burgeoning tourism opportunities in and around our communities.

**Response:**

Tourism development is supported in LDP2. Other development such as unconventional oil and gas extraction would be assessed under the minerals policies. It is noted that the Scottish Government has issued Directions preventing Planning Authorities from taking decisions on planning applications for unconventional oil and gas or underground coal gasification applications.

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LDISUE: LDMI23

**Comment:**

Given the physical constraints around Grangemouth such as the M9 and River Forth and the level of proposed industrial development attempts to maximise existing infrastructure will be pointless. Roads are overloaded at peak times and while NPF3 recognises the need to minimise any impact from industrial traffic a radical approach to develop an integrated transport system is needed. A four way motorway junction is required at junction 6 with on and off ramps to the east, a passenger rail station at union road linked to bus services and car parking and the segregation of town and industry traffic with an industry only route via Earls Road.

**Response:**

The Proposed Plan recognises that improvement is required to the roads infrastructure in and around Grangemouth associated with proposed development. A site for a rail station continues to be safeguarded in the town centre.

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LDISUE: LDMI24

**Comment:**

More clarity and honesty in defining options. For district heating there are a number of questions such as will waste heat just be provided to public buildings and businesses or include housing. Who will install and maintain the distribution system, who will retrofit properties and what will the running costs be. Finally what will the fallback position be if there are technical problems. References to heat from renewable sources should define what these sources will be. If the fuel source for the CCS plant is coal local environmental impacts could be significant dependent on transportation methods and waste disposal.

**Response:**

Policy IR12 highlights factors in the assessment of energy proposals and Policy IR14 indicates support for district heating for new development. The plan also recognises that there is some potential in Grangemouth for surplus heat from industrial sources to be utilised. Renewable heat sources are not specifically defined but can include wind, energy from waste and biomass from wood waste.

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LDISUE: LDMI25

**Comment:**

Given the number of industrial sites in Grangemouth the support for waste management facilities on business and industry sites is concerning. We understand that the Scottish Government Waste Strategy states that waste should be managed as close to source as possible and not transported over long distances. This may however be necessary until localised facilities can be constructed. Grangemouth should not become the waste management centre for others. This area has already experienced the effects of mismanaged and poorly regulated facilities. The recent consent at CalaChem for a CHP plant fuelled by RDF imported from outwith the Council is also highlighted.

**Response:**

The Proposed Plan supports the establishment of waste management facilities on business and industrial land in accordance with Scottish Planning Policy (SPP). SPP also highlights that while there is a capacity shortfall the emphasis is on need rather than proximity. Policy IR17 Waste Management Facilities recognises the need to consider the impact on local amenity and on sensitive receptors nearby including consideration of a buffer zone.

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No. of comments: 11

LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Greenwells Developments are seeking the inclusion of a site at Greenwells Farm (site 139) for housing in LDP2 with the potential for mixed use elements, including a farm shop and cafe. The site is relatively small and is considered effective and deliverable. A number of expressions of interest from developers have been received. Initial feasibility studies relating to potential constraints has also taken place. Allocation of the site would address the housing shortfall, and offer an alternative to larger, high-risk sites. The site will also deliver affordable housing and greenspace.

**Response:**

The site would represent a western expansion of Maddiston into the countryside. Landscape impacts are significant, and site has relatively low accessibility. Education is an issue, although constraint may be overcome through pre-zoning to Wallacestone PS, and this would split community between two schools. Current growth on the Braes is focused on sites at Maddiston East.

No. of comments: 1

**Ms Sandra Hallows**

00888/FLDP\_MIR/3001/001

LDISSUE: LDI002

**Comment:**

I agree with the sentiments of the vision.

**Response:**

Comment is noted and welcomed.

LDISSUE: LDMI15

**Comment:**

You can help to create high quality places by retaining the green belt in development areas so that people can continue to enjoy the environment in which they live. This is the reason why so many people have chosen to live in the Falkirk area in the first place.

**Response:**

The Proposed Plan retains a green belt which has been reviewed as part of the plan's spatial strategy for the Council area.

LDISSUE: LDMI16

**Comment:**

Maintain the green landscape character along Standrigg Road. This is an important aspect for the communities already living in the area.

**Response:**

Comment noted. LDP2 does not propose housing development within Wallacestone, including along Standrigg Road.

LDISSUE: LDMI17

**Comment:**

Agrees with the reduction in the housing target and not allocating the non-preferred sites.

**Response:**

Comment noted.

LDISSUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

I strongly object to any additional housing development being undertaken at Standrigg Road. I have concerns about the additional strain on local services and infrastructure such a development would have: Local schools and health centres are at capacity; the mains sewer is at capacity; increased vehicular traffic caused by new development will adversely affect road safety along Standrigg Road and Sunnyside Road and the junction of Sunnyside Road and the B805 due to restricted width and lack of adequate footways; and Polmont Station car park is currently overflowing onto adjacent streets. Additional traffic will exacerbate this problem.

**Response:**

Comment noted. LDP2 does not propose housing development within Wallacestone, including along Standrigg Road.

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LDISSUE: LDMI21

**Comment:**

Completely agree with the preferred options for town centres.

**Response:**

Support noted.

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LDISSUE: LDMI22

**Comment:**

It would be good to have a wider range of uses at Gilston Park in Polmont, particularly as the Canal is nearby. The countryside around Nicolton Road is very attractive and I believe this area could be used to enhance tourism (may be close Nicolton Road to through traffic - apart from the farmers and use as a cycle/walking track). It would also be an amenity to the local community.

**Response:**

Comments are noted. LDP2 retains the site's current business use allocation. This supports mixed industrial, commercial, tourism and leisure uses at the site. LDP2 provides detailed guidance on the site's development, including greenspace enhancements and path linkages to improve the amenity and accessibility of the site.

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LDISSUE: LDMI23

**Comment:**

Agree with the preferred options for infrastructure.

**Response:**

Support noted.

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LDISSUE: LDMI24

**Comment:**

Agree with the preferred options for energy.

**Response:**

Support noted.

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LDISSUE: LDMI25

**Comment:**

Agree with the preferred options for onshore gas, minerals and waste.

**Response:**

Comment noted.

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**Mo Hamilton**

02795/FLDP\_MIR/3001/001

LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Does not support the allocation of a site at Standrigg Road, Wallacestone (site 147) for residential development. Development would cause the value of objectors property to decrease. Standrigg Road is identified as a bus route in the submission, but the closest stop has not been functional as a bus stop for 25 years. There are concerns about traffic into Standrigg Road, in terms the narrow width of the road, as well as impacts from construction traffic. There is no capacity at Wallaceston Primary or Maddiston primary, California has limited capacity. The Council would have to provide buses for any rezoning to California as there is no safe walking route. There is wildlife present on the site including badgers, bats, deer, foxes and voles. There are flooding and drainage issues within the site. Persimmon claim that they own the site, but access is via a private drive.

**Response:**

The site is not identified for housing development in the Proposed Plan. The site would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. The site also has low accessibility due to it's location in relation to local services, and the issue regarding the provision of a footway along the length of Standrigg Road.

No. of comments: 1

**Hamilton & Kinneil Estates**

00784/FLDP\_MIR/3001/002

LDISUE: LDMI17

**Comment:**

The MIR adds a 15% generosity allowance to the housing supply target, however the Scottish Planning Policy allows for an up to 20% allowance to be added. An increase in this flexibility would allow the Council to allocate additional smaller scale sites which are deliverable in the short to medium term in order to complement the larger allocations which have stalled and will now deliver in the longer term.

**Response:**

The HNDA identified housing need at 418/yr and we have increased this to a housing target of 450/yr as part of the Proposed Plan. The HNDA which the Proposed Plan is based on is dated May 2016 and was declared "robust and credible" by the CHMA(Centre for Housing Market Analysis) which is a division of the Scottish Government. The current flexibility allowance is 14%. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr.

LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Hamilton and Kinneil Estates seek the inclusion of a site at Southmuir Farm, California for residential development. The site would form a logical settlement extension. There is capacity at both California Primary and Braes High school. The site is relatively free from constraint, including flood risk and road network capacity. Smaller development sites are more deliverable than larger sites in rural areas and this site is considered to be effective and deliverable.

**Response:**

The site does not represent a logical extension of the settlement. Church Road is constrained. The site has questionable effectiveness, and there are other sites which have been de-allocated in the Proposed Plan. Consequently, the site is not proposed for allocation for residential development in the Proposed Plan.

No. of comments: 2

LDISUE: LDMI21

**Comment:**

The approach to Falkirk Town Centre is supported in principle, specifically the rejection of the option of excluding Central Retail Park (CRP) from the Town Centre boundary. CRP is a significant positive asset in the Town Centre's ability to retain shopping trips as it accommodates national multiple retailers that would otherwise have been unable to meet their business model requirements in the Town Centre. A flexible and proactive approach to accommodating a wide range of uses should be applied to the Town Centre as a whole including CRP. As such LDP1 Policy TC02(4) should be reviewed and the policy support for the historic S75 obligation removed.

**Response:**

In response to concerns about Central Retail Park's inclusion within the Falkirk Town Centre boundary by various parties, the Council has reviewed its approach to the Retail Park, and concluded that it has the character of a commercial centre as defined in SPP. Accordingly, Central Retail Park has been removed from the town centre boundary and classified as a commercial centre in the Proposed Plan.

No. of comments: 1

**Mr Richard Hannah**

02930/FLDP\_MIR/3001/001

LDISUE: LDMI19      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Online and paper petition with 363 signatories. Objects to the preferred housing site at Crawfield Road, Bo'ness (site 102). Development here will take the focus away from the centre which is in need of redevelopment. The site is green belt whose release should be a last resort. Other areas exist which should be developed instead, e.g. shirt factory site, the Drum and the Foreshore. Development would result in the loss of a beautiful area of countryside and prime farmland, create a fragmented border to the town and endanger a SSSI located nearby.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release. The focus will be on the Bo'ness South East Strategic Growth Area, and in particular the completion of the Drum. Housing opportunities within the urban area are limited. Bo'ness Foreshore is not considered to an effective site for large scale growth due to constraints, high development costs and viability issues.

No. of comments: 1

LDISUE: LDMI17

**Comment:**

The proposal housing land supply target of 480 units p.a should be increased to 2011 levels of 899 p.a. Information provided by Homes for Scotland shows that completions are far in excess of Council's assumptions. Flexibility allowance should be 30%. The lack of housing land supply means that a policy based on SPP presumption in favour of sustainable development should remain to allow unallocated sites to be considered.

**Response:**

The Housing Need and Demand Assessment (HNDA), which has 'robust and credible status' from the Scottish Government's Centre for Housing Market Analysis and identified housing need at 418 homes per year. The Council has increased this to a housing target of 450 homes per year. While this is a reduction from LDP1, the target is higher than the HNDA estimate and more closely reflects current population trends and lower household projections, as well as reflecting current market conditions and infrastructure constraints. The Proposed Plan has applied a 14% flexibility allowance. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr. This lower target still meets the projected household needs of the Council area identified in the HNDA as 418/yr so at a minimum this would be 4180 for 2020 – 2030.

**Comment:**

In the HLA, only 31 of 149 sites are housebuilder backed. The effective supply is therefore only around 57%. Further allocations are therefore required.

**Response:**

Of the 144 sites in the original 16/17 HLA 63 sites (44%) are owned by housebuilders or development companies. This accounts for 49% of all units. The remainder are owned by private individuals, the Council and RSL's. The test of effectiveness is not that a site is backed by a housebuilder, but whether it is in the ownership or control of a party which can be expected to develop it or to release it for development.

LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Whitecross New Settlement (site 076) is ineffective and should be removed from the housing land supply.

**Response:**

The Whitecross proposal has been subject to review, and the Proposed Plan now includes a much reduced housing proposal which is considered to be more realistic and deliverable, with reduced infrastructure requirements. It is considered that this is effective in the period of the plan.

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**Comment:**

Residential development should form part of the Gilston site (site 095). Gilston is effective, and would make a substantial contributions to the housing land supply. The site is also accessible.

**Response:**

Gilston is identified exclusively for employment use, with no residential element, in the Proposed Plan. This is on the basis that the site is of strategic importance for economic development. The introduction of residential use would have implications for the flexibility and choice in the business land supply. The site also forms part of the Council's TIF business case. Large scale residential use would pose infrastructure issues for the local area, including education and healthcare. There would also be additional pressures on car parking at Polmont station.

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LDISSUE: LDMI20

**Comment:**

Falkirk Council has an industrial land supply in excess of 100 years. On this basis, identification of Gilston for residential development would have minimal impact on the current supply. This does not take into account 100 hectares at INEOS. INEOS is the main driver of business growth, and is the main focus for growth.

**Response:**

The total amount of land currently allocated for business and industry in the LDP is around 290 hectares. Whilst this is extensive in relation to current take up rates, it is important to note that only a proportion of the land supply is immediately available without significant investment in infrastructure and site preparation. It is also important to identify a varied portfolio of sites offering a variety of locations, site sizes and levels of amenity, in order to ensure that investment opportunities are not lost. Technical Report 6 provides a further assessment of employment land.

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No. of comments: 5

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Ms Hassan Karen

02923/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

Too much focus on housebuilding, without the same effort to consider the impact on existing infrastructure and communities.

**Response:**

The Proposed Plan sets out the key infrastructure projects which are needed to address existing deficiencies and support growth in communities. In addition, developer contributions will continue to play an important role in delivering infrastructure which is required to mitigate the impacts of new development.

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LDISSUE: LDMI15

**Comment:**

Design of new housing developments does not take into consideration safety and security for residents and visitors. Rabbit warren design increases the risk of anti-social behaviour and crime.

**Response:**

Safety and security for residents is a key criteria, as set out in Policy PE01 Placemaking in the Proposed Plan. This overarching design policy is further supported by supplementary guidance SG02 Neighbourhood Design.

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LDISSUE: LDMI17

**Comment:**

Slower rate of growth is required. Existing communities are struggling to adapt to new housing and existing infrastructure is not sufficient. Suggested increase will require new schools and accompanying facilities to adapt.

**Response:**

The Proposed Plan contains a reduced housing supply target which reflects the projected reduction in the rate of household growth in the area. So growth will be slower. The Proposed Plan makes provision for infrastructure to meet existing deficiencies and support new growth.

**Comment:**

Increased housing will impact on communities, including anti-social behaviour due to the lack of facilities and safe spaces for young children.

**Response:**

Comment noted.

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**Comment:**

Mixing affordable housing with private housing will have a negative impact on communities. Nice ideology but in practice this exacerbates existing problems and introduces new problems.

**Response:**

The Proposed Plan is committed to ensuring mixed communities and continues to seek the provision of a proportion of affordable housing from private housing on sites of 20 units or over.

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LDISUE: [LDMI20](#)

**Comment:**

No more houses in business locations.

**Response:**

Some flexibility has been introduced to business sites carried forward from LDP1 where future business potential is considered limited.

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LDISUE: [LDMI21](#)

**Comment:**

What about community centres. Kinnaird Village was promised restaurant/bar, nursing home, retail but none of this has come to exist, yet more houses are thrown up with the lure of empty promises.

**Response:**

The Proposed Plan can allocate land for retail, business etc but the take up of such commercial uses is market dependent.

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No. of comments: 7

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**Mr Barry Hearse**

02825/FLDP\_MIR/3001/001

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LDISUE: [LDMI19](#)      MIR2/BNS      MIR2 Bo'nness Sites

**Comment:**

Objects to Crawfield Road site (102) due to the fact that it is green belt, the development is out of scale with the area, there would be detrimental impact on local amenities, the site is a designated Special Landscape Area, it would set a precedent for further breaches of the green belt, and construction would create noise and disturbance for local residents.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

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No. of comments: 1

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LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Objects to the potential development of land at Standrigg Road, Brightons (site 221) for housing. Proposed development of this size will not help existing infrastructure. The local primary and high schools are at capacity. The surrounding road network is inadequate, particularly the Sunnyside Road junction.

**Response:**

Standrigg Road (Site 221) site would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. The site is therefore not identified for housing development in the Proposed Plan.

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No. of comments: 1

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**Historic Environment Scotland**

02656/FLDP\_MIR/3001/035

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LDISUE: LDMI15

**Comment:**

We urge the continued use of placemaking tools such as site specific design guidance to ensure that development proposals integrate effectively with existing built and historic environment features. We support the intention to develop place statements in consultation with local communities. We note that the review of Falkirk's Built Heritage Strategy may result in changes to the Council's historic environment policies. The Council should engage further with HES if they wish to make any modifications.

**Response:**

Comment noted.

LDISUE: LDMI16

**Comment:**

The identification of an Antonine Wall Trail and a community growing site at the walled garden in Kinneil Estate (site 0196) as green network opportunities is welcomed. Further engagement with HES and the relevant WHS partnership is encouraged as these proposals develop.

**Response:**

Comment Noted. The Council is keen to engage with Historic Environment Scotland and the relevant WHS partnership as and when proposals develop.

LDISUE: LDMI18

**Comment:**

We support the retention of those sites that may promote the restoration of listed buildings in the area.

**Response:**

Comment noted.

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**Comment:**

Banknock South (site 0007) is within the Antonine Wall WHS Bufer Zone and adjacent to the Forth and Clyde Canal SAM. There is potential for adverse impacts on the site and setting of the SAM and potential for the WHS outstanding universal value authenticity and integrity to be affected. Impact on the canal can be mitigated through sensitive design. Impact on the WHS will required thorough assessment to inform any proposals.

**Response:**

The Proposed Plan includes the site as a housing proposal. Mitigation/enhancement measures are incorporated in the plan through Development Guidance for Major Areas of Change, and the environmental policies of the plan e.G. Policy PE05.

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**Comment:**

Seabegs Road (site 0011) is located adjacent to the Forth and Clyde Canal SAM and the southern part of the site overlaps with the Antonine Wall WHS. There is potential for the WHS outstanding universal value, authenticity and integrity to be affected. There is also potential for an adverse impact on the setting of the adjacent section of the Antonine Wall. Any development here will need to closely follow the Antonine Wall SPG. Early consultation with HES and the Council's archaeologist is recommended.

**Response:**

The Proposed Plan includes the site as a housing proposal. Mitigation/enhancement measures are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan e.G. Policy PE05 or PE06.

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**Comment:**

Garngrew Road (site 0061) is within the Antonine Wall WHS buffer zone and adjacent to the Forth and Clyde Canal SAM. There is potential for the outstanding universal value, authenticity and integrity of the WHS to be affected. Impact on the WHS will require thorough assessment to inform any proposals.

**Response:**

The Proposed Plan retains the site as a housing proposal. Mitigation/enhancement measures are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

**Comment:**

East Bonnybridge (site 0077) is within the Antonine Wall WHS buffer some and adjacent to the Forth and Clyde Canal SAM. There is potential for adverse impacts on the site and setting of the canal and potential for the outstanding universal value, authenticity and integrity of the WHS to be affected.

**Response:**

The Proposed Plan includes the site as a mixed use proposal. Mitigation/enhancement measures for the Antonine Wall and Forth and Clyde Canal scheduled monument are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

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**Comment:**

Broomhill Road 2 (site 0110) is within the Antonine Wall WHS buffer zone, it also overlaps with the Antonine Wall WHS and SAM. Development of this site has the potential to significantly and adversely impact the outstanding universal value of the WHS and the site and setting of the SAM. HES do not recommend that this allocation is taken forward.

**Response:**

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

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**Comment:**

Bonnyside Road (site 0112) is within the Antonine Wall WHS buffer zone. Development has the potential to adversely impact on the outstanding universal value of the WHS. Development in the southern half of this site has particular potential for significant detrimental impact. HES recommend that the site boundary should be re-drawn to address this concern.

**Response:**

The site has not been identified as a proposal in the Proposed Plan.

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**Comment:**

Reilly Road (site 0113) is within the Antonine Wall WHS buffer zone. The site also overlaps with the Antonine Wall WHS and SAM. Development of the site has the potential to adversely impact the outstanding universal value of the WHS. Development of the eastern half of the site would be likely to have such significant impacts that HES would not support this allocation being taken forward in its current form.

**Response:**

The site has not been identified as a proposal in the Proposed Plan.

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**Comment:**

Cumbernauld Road (site 0114) lies within the Antonine Wall WHS buffer zone and there is potential for the outstanding universal value of the WHS to be affected through poorly designed development. Impacts on the WHS will require thorough assessment to inform any proposals.

**Response:**

The proposed Plan includes the site as a housing proposal. Mitigation/enhancement measures are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

**Comment:**

Milnquarter Farm (site 0178) is within the Antonine Wall WHS buffer zone and overlaps with the Antonine Wall WHS and SAM. HES would not support this site's inclusion within the plan.

**Response:**

The site has not been identified as a proposal in the Proposed Plan.

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**Comment:**

Bo'ness Foreshore (site 0063) is in the vicinity of Bo'ness Station category A listed building. Impacts can be mitigated through sensitive design.

**Response:**

The Proposed Plan does not identify the site as a development proposal. Instead, the site is identified as open space.

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**Comment:**

East Muirhouses (site 0105) is adjacent to the Antonine Wall WHS buffer zone on two sides. The development of this site is unlikely to have an adverse impact on the setting of the WHS or nearby scheduled Roman sites.

**Response:**

The site has not been identified as a proposal in the Proposed Plan.

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**Comment:**

A significant proportion of the eastern end of Cadzow Avenue 2 (site 0107) is within the buffer zone of the Antonine Wall WHS. There is potential for impacts on the WHS. Impacts will require thorough assessment to inform any proposals.

**Response:**

The site has not been allocated as a housing proposal in the Proposed Plan

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**Comment:**

Steins Brickworks (site 0075) is adjacent to the Antonine Wall WHS and associated SAM. The intervening railway line suggests that there would be no impact on the setting of the scheduled souterrain. Impacts on the Antonine Wall can be mitigated through sensitive design.

**Response:**

The Proposed Plan retains the site as a mixed use proposal. Mitigation/enhancement measures are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

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**Comment:**

Milnholm Riding Centre (site 0135) lies within the Antonine Wall WHS buffer zone. Poorly designed or overly dense development could detract from the outstanding universal value of the WHS. Impacts on the WHS will require thorough assessment to inform any proposals

**Response:**

Comment noted. The site has not been identified as a proposal in the Proposed Plan. Reasons include development within the Antonine Wall WHS buffer zone.

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**Comment:**

Station Road (site 0136) is adjacent to the Union Canal scheduled monument. There is potential for a significant and adverse impact on the site and setting of the scheduled canal.

**Response:**

The site has not been identified as a proposal in the Proposed Plan. Reasons include adverse visual impacts on Union Canal.

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**Comment:**

Parkhall North (site 0141) overlaps the Union Canal scheduled monument. There is potential for significant and adverse impact on the site and setting of the canal.

**Response:**

The site has not been identified as a proposal in the Proposed Plan.

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**Comment:**

Parkhall Farm North East (site 0142) is adjacent to the Union Canal SAM. There is potential for significant and adverse impact on the site and setting of the canal.

**Response:**

The Proposed Plan includes the site as a proposal for retirement housing and a care home. Mitigation/enhancement measures for the site's development are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

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**Comment:**

Redding Park North (site 0145) is adjacent to the Union Canal scheduled monument. There is potential for significant and adverse impact on the site and setting of the canal.

**Response:**

The site has not been identified as a proposal in the Proposed Plan. Reasons include potential impact on the setting of the Union Canal scheduled monument.

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**Comment:**

Gowan Avenue (site 0018) is adjacent to the Forth and Clyde Canal SAM. There is potential for adverse impacts on the site and setting of the canal. Impacts can be mitigated through sensitive design.

**Response:**

The Proposed Plan includes the site as a housing proposal. The site has planning permission.

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**Comment:**

Portdownie (site 0068) is adjacent to the Forth and Clyde Canal SAM. The south-eastern corner of the site is also within the Antonine Wall WHS and partly within the WHS buffer zone. There is high potential for dense, high and/or insensitively designed and located development to have a significant detrimental impact on the WHS. The impacts of any proposals on the WHS and the setting of adjacent monuments would have to be thoroughly assessed to inform emerging proposals. A design brief, agreed with HES, may be helpful.

**Response:**

The Proposed Plan retains the site as a housing proposal. Mitigation/enhancement measures are incorporated in the plan through Development Guidance for Major Areas of Change, and through the environmental policies of the plan.

**Comment:**

The south-western corner of Williamson Street (site 0073) is partly within the Antonine Wall WHS. No development should take place within this part of the site. Impacts on the WHS will require thorough assessment to inform any proposals.

**Response:**

The Proposed Plan retains the site as a mix use proposal. It has planning permission.

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**Comment:**

Slamannan Road (site 0120) is adjacent to the Union Canal SAM and is also located within the Battle of Falkirk II Inventory Battlefield. Development has the potential to adversely affect the site and setting of the canal but can be mitigated through sensitive design. The area between this site and Falkirk High station has high potential for buried remains associated with the Battle of Falkirk II and its aftermath. Archaeological mitigation is likely to be required and may have an impact on the development.

**Response:**

The site has not been identified as a proposal in the Proposed Plan. Reasons include potential adverse impacts on the Union Canal scheduled monument.

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**Comment:**

Seaton Place (site 0126) is within the Antonine Wall WHS buffer zone and the Callendar Park inventory designed landscape. Development of the site is likely to have an adverse impact on the designed landscape and the outstanding universal value of the WHS. HES do not wish to see further development in this location.

**Response:**

The site has not been identified as a proposal in the Proposed Plan. Reasons include adverse visual and landscape impacts on the Antonine Wall WHS and Callendar Park Inventory Designed Landscape.

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**Comment:**

Woodend Farm 2 (site 0160) is immediately to the south of the Callendar Park inventory designed landscape and is bounded to the north by the category C listed boundary walls of the Callendar Park estate and Callendar Wood. Development could have an adverse impact on the setting of the inventory site. Impacts could possibly be mitigated through sensitive design.

**Response:**

The Proposed Plan identifies the site as a new housing proposal. Mitigation/enhancement measures are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

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**Comment:**

Woodend Farm 3 (site 0160) is immediately to the south of the Callendar Park inventory designed landscape and is bounded to the north by the category C listed boundary walls of the Callendar Park estate and Callendar Wood. Development could have an adverse impact on the setting of the inventory site. Impacts could possibly be mitigated through sensitive design.

**Response:**

The site has not been identified as a proposal in the Proposed Plan.

**Comment:**

Pretoria Road (site 0062) is opposite Larbert Old Church category A listed building and the James Bruce Monument SAM. There is a potential adverse impact on the setting of these heritage assets. Impacts can be mitigated through sensitive design.

**Response:**

The Proposed Plan retains the site as a housing proposal. Mitigation/enhancement measures are incorporated in the plan through the environmental policies of the plan.

**Comment:**

Airth Castle South (site 0041) is in the vicinity of Airth Old Church and Airth Castle category A listed buildings. Impacts to the setting of these listed buildings can be mitigated through sensitive design.

**Response:**

The Proposed Plan retains the site as a housing proposal. Mitigation/enhancement measures are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

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**Comment:**

The Glebe 1 (site 0042) is located to the south of the Dunmore Park/ The Pineapple Inventory Designed Landscapes. The intention to provide strong structural planting at this site is welcomed. Planting to the north and west of this site would mitigate any impacts in views from the Inventory Designed Landscapes.

**Response:**

The Proposed Plan retains the site as a housing proposal. Mitigation/enhancement measures are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

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**Comment:**

The Glebe 2 Airth (site 0149) is immediately to the south of the Dunmore Park/ The Pineapple inventory designed landscapes. Development could have an adverse impact on the setting of the inventory sites. Impacts could possibly be mitigated through sensitive design and strong structure planting.

**Response:**

The site has not been identified as a proposal in the Proposed Plan.

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LDISSUE: LDMI20

**Comment:**

We are content with the preferred business locations identified in the MIR provided that development is sensitively designed to accommodate Falkirk's canal corridors.

**Response:**

Comment noted.

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**Comment:**

Beancross (site 0096) is located within the Antonine Wall WHS buffer zone. There is potential for the outstanding universal value, authenticity and integrity of the WHS to be affected. Impact on the WHS will require thorough assessment to inform any proposals.

**Response:**

The Proposed Plan retains the site as an economic development allocation. Mitigation/enhancement measures are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

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**Comment:**

Grandsable Road (site 0137) overlies the Antonine Wall WHS and is within the buffer zone of the WHS. Potential for significant impacts on the outstanding universal value of the WHS is very high. HES recommend that this proposal isn't taken forward in its current form. The northern boundary should be redrawn to exclude the WHS and provide a sufficient buffer to allow its immediate setting to be protected.

**Response:**

Grandsable Road (site 0137) has extant planning permission for a distillery which is currently under construction. LDP2 has allocated Grandsable Road as a new business use site (BUS23) to reflect the permission. Mitigation/enhancement measures for the site's future development are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

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**Comment:**

Rosebank Distillery (site 0084) overlaps with the Forth and Clyde Canal SAM. We have no issues in principle with this allocation and note that pre-application discussions are underway.

**Response:**

The Proposed Plan retains the site as an economic development allocation. Mitigation/enhancement measures are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

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**Comment:**

Callendar Business Park (site 0085) is within the Callendar Park Inventory designed landscape. Development in this location would have a direct impact on the Inventory site. As some land to the north and west of this site has been developed as a business park, some development could be accommodated through sensitive design and the safeguarding of mature specimen trees that bound the site to the south and east.

**Response:**

The Proposed Plan retains the site as a business allocation. Mitigation/enhancement measures are incorporated in the plan through appropriate site comments in the Proposals and Opportunities Schedule and through the environmental policies of the plan.

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LDISUE: LDMI21

**Comment:**

Investment in town and district centres can bring distinct benefits to the historic environment. In particular we encourage the re-use of historic and existing building stock in the area to meet housing need.

**Response:**

Comments noted.

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**Comment:**

Grangemouth town centre allocation (site 074) is adjacent to Dundas Church category A listed building. Impacts can be mitigated through sensitive design.

**Response:**

The Proposed Plan retains the site as a mix use proposal. Mitigation/enhancement measures are incorporated in the plan through the environmental policies of the plan.

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LDISUE: LDMI22

**Comment:**

We support measures to introduce a new trail along the Antonine Wall WHS and to improve the quality of the area's canal network. We also welcome the proposal to restore the walled garden in Kinneil Estate through creating a new tourism development. Further engagement with HES is encouraged as these proposals progress.

**Response:**

Comment noted. The Council is keen to engage with Historic Environment Scotland and other key stakeholders as and when proposals develop.

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LDISUE: LDMI23

**Comment:**

The Grangemouth Flood Protection Scheme may affect the site and setting of SAM in the vicinity of the Antonine Wall WHS. Further contact with HES is encouraged as these proposals progress.

**Response:**

Comment noted. The Council will continue to engage Historic Environment Scotland, as a key stakeholder, on the appraisal of options for the Grangemouth Flood Protection Scheme.

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LDISSUE: LDMI24

**Comment:**

We support the intention to introduce a spatial framework for wind energy development, understanding that impacts on the historic environment will be assessed on a case by case basis.

**Response:**

Comment noted. The spatial framework can be found in LDP2, pg. 27, Map 3.7.

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No. of comments: 42

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**Homes For Scotland**

00284/FLDP\_MIR/3002/001

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LDISSUE: LDI002

**Comment:**

Question Falkirk Council's assumptions that housebuilding levels show little sign of returning to pre-recession levels. Recent housebuilding rates have been increasing significantly. In terms of the "thriving communities" theme the importance placed on facilitating population and household growth and building sustainable attractive communities and providing infrastructure is welcomed but the overall approach is lacking in ambition.

**Response:**

The Proposed Plan aims to deliver enough housing land to provide for its growing population. Average house building rates for the Council area between 2007 and 2017 have been 486/yr although build rates for the last five years between 2012 and 2017 have been 534/yr. So there has been some improvement but not to pre recession levels.

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LDISSUE: LDMI17

**Comment:**

The housing supply target derived from the HNDA fails to take into account recent completion trends and there is a disconnect between the HNDA and evidence on the ground. The scenario's used in the HNDA are also questioned, they are too alike and too modest. The Council needs to reconsider the proposed growth strategy and a new rate is proposed of a minimum of 600 units/yr. There is no justification for the reduction in the generosity allowance from LDP1 and too strong a reliance on existing land supply. A flexibility allowance of 20% should be applied alongside a critical review of the effective housing land supply with a view to identifying additional effective sites. The affordable housing target of 205/yr is high compared to average completions of 109/yr and it is not clear how this will be achieved. Evidence should be provided to indicate funding provision is available for a significant proportion of the target. In the event of a shortfall in funding a proportion of units should be added to the private sector target to ensure the overall housing supply target is met.

**Response:**

The HNDA has been approved as robust and credible with the scenario used. It is based on National Register of Scotland household projections 2012 which when extrapolated to 2039/40 are slightly higher than the 2014 projections. The population is still continuing to grow albeit at a slightly lower rate and the plan aims to satisfy the projected population and household growth. A review of existing land supply has been undertaken and the current flexibility allowance is 14%. Technical Paper 3 and the LDP recognise that there is scope for the affordable housing element of the target to be met in different ways not all of which will be new build. Any continuation of the buyback scheme would see an equivalent increase in the private sector element of the target reflecting private stock being brought back into the affordable sector. The split between the affordable and private elements of the target is not therefore intended to be prescriptive. It is anticipated at this stage that the buyback policy will continue which at current rates aims to purchase 90 properties per year. The Council's Strategic Housing Investment Programme (SHIP) indicates the funding programme for affordable housing and is updated annually.

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LDISSUE: LDMI18

**Comment:**

Concerns are raised about the effectiveness of the existing land supply. The out of date HLA has projected outputs of 3054 to 2025 and it is assumed that a further 971 units are expected to come forward to 2030. No evidence is provided to support this. The figures should be reviewed taking into account the 2016/17 HLA which could result in a revised housing land requirement for 2020-2030 and the identification of additional effective housing sites.

**Response:**

The effectiveness of the existing housing supply is reviewed annually within the Housing Land Audit and a number of sites are proposed for deallocation in the LDP. The 2016/17 HLA has been used for the Proposed Plan and has been further adjusted to reflect up-to-date site changes. This has reduced the output within the plan period by 221 units. Technical Report 3 also now includes a table indicating the estimated completions between 2026 and 2030.

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LDISSUE: LDMI19

**Comment:**

The emphasis on Bo'ness for additional housing is of concern. Strongest market demand continues to be in central areas such as Falkirk, Larbert/Stenhousemuir and Polmont and Lower Braes and there is a lack of emphasis on these areas for further growth. Need to approach infrastructure issues differently in partnership with the development sector rather than focussing on areas which while having infrastructure capacity are less marketable. There should be additional allocations in the most sustainable and marketable locations. The MIR has produced no evidence to justify 1650 completions coming forward on new sites to 2030. Based on the evidence presented a windfall allowance of 50/yr appears reasonable. The inclusion of a policy to assess alternative sites where there is not an effective 5 year land supply is supported subject to compliance with SPP.

**Response:**

New housing allocations reflect areas with capacity for further growth which are also considered marketable locations. Additional allocations have been made in Falkirk and Polmont/Lower Braes as well as Bo'ness and given the proposed site locations and developer interest they are considered capable of coming forward within the first ten years of the plan. Only 10% of allocations are in Bo'ness, which is not a disproportionate amount. Analysis of previous windfall rates indicates that a rate of 50/year is achievable. The Council is also willing to consider different ways of providing infrastructure where feasible.

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LDISSUE: LDMI23

**Comment:**

Further discussion is welcomed on the mechanisms to deliver key infrastructure. Infrastructure requirements should be proportionate to the development and there should be an emphasis on ensuring that delivery timescales reflect the availability of funding. The alternative option of a global infrastructure levy should be treated with caution and it may not meet the relevant tests in Circular 3/12.

**Response:**

LDP2 continues policy support for developer contributions while recognising that they should be proportionate and that the economic viability of proposals should also be considered. There is also policy support for a reduction in some developer contributions in smaller flatted developments in town centres.

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LDISSUE: LDMI24

**Comment:**

Neither householders nor developers can be compelled to use a particular energy source and district heating schemes may have viability issues. There should be no imposition of additional work on developers to consider connection to such schemes at a time when there is little information available on how the Council sees them coming forward. Potential support expressed for alternative approaches to the LZCGT policy that achieve equivalent emission reductions.

**Response:**

Policy IR14 Heat Networks encourages decentralised energy generation and district heating systems and major new developments should include an Energy Statement which includes an assessment of the viability of such schemes. No specific energy source is identified. Policy IR13 sets out the requirements for development to meet LZCGT targets. The requirement for this policy continues to be driven by the Climate Change (Scotland) Act.

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No. of comments: 6

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**Mr Roddy Htet-Khin**

00803/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

I like the vision, especially the focus on green spaces.

**Response:**

Supporting comment is noted and welcomed.

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LDISSUE: LDMI15

**Comment:**

When considering sites for housing, prioritise the regeneration of brownfield land as this will limit the use of greenfield sites and countryside locations. Ensure there is enough community infrastructure available before allowing new housing to go ahead.

**Response:**

A mixture of brownfield and greenfield sites is needed to deliver the housing requirement over the plan period 2020-2030 and to satisfy Scottish Planning Policy requirements. The Proposed Plan sets out the key infrastructure projects which are needed to address existing deficiencies and support growth in communities. In addition, developer contributions will continue to play an important role in delivering infrastructure which is required to mitigate the impacts of new development.

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LDISSUE: LDMI16

**Comment:**

Standrigg Road should be made part of the Green Network. The South facing fields are a popular cycle route.

**Response:**

Comment noted.

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LDISSUE: LDMI17

**Comment:**

Housing targets should be reduced as proposed. Any new sites should be on brownfield or town centre sites.

**Response:**

Comment noted. The Proposed Plan does allocate town centre and brownfield sites for future development. However, greenfield sites are also needed to deliver the scale of housing required over the plan period.

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LDISsUE: [LDMI18](#)

**Comment:**

More stalled sites should be removed, but don't add any new sites, especially in countryside locations.

**Response:**

Comment noted.

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LDISsUE: [LDMI19](#)

**Comment:**

The infrastructure in the Wallacestone/ Upper Braes area is at capacity and cannot cater for any more houses. There are not enough school places, amenities, or local community centres / leisure areas to support any extra houses. Also the roads are not built to accommodate significant amounts of additional traffic.

**Response:**

Comment noted. The Proposed Plan sets out the key infrastructure projects which are needed to address existing deficiencies and support growth in communities. In addition, developer contributions will continue to play an important role in delivering infrastructure which is required to mitigate the impacts of new development.

**Comment:**

Development of the fields to the south of Standrigg Road (Site 221) would adversely affect the character of the neighbourhood and community. Schools in the local area are already at capacity. The road leading into the development is unsuitable to support the influx of extra traffic and there is no pavement on sections of the road which is dangerous for pedestrians (especially school children).

**Response:**

Noted. The site is not identified for housing development in the Proposed Plan.

LDISsUE: [LDMI20](#)

**Comment:**

I agree with the preferred option of dealing with out major employment sites.

**Response:**

Comment noted.

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LDISsUE: [LDMI21](#)

**Comment:**

I think a focus on building in the Town Centre is a good idea, as it would also benefit businesses and make it more attractive to shoppers and tourists.

**Response:**

Comment noted.

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LDISUE: LDMI22

**Comment:**

I think the view from the top of Wallace Brae could be promoted as a Historical Tourist Site as (according to the plaque on the top) it was where William Wallace commanded his armies. The view of Stirlingshire and the Ochil Hills and beyond is spectacular. The road leading up to the viewpoint should remain undeveloped to retain its countryside setting.

**Response:**

Comment noted. It is assumed the representation is referring to the site of Wallace's Stone, on Standrigg Road. LDP2 does not propose new sites, including along Standrigg Road, for housing development within the vicinity of Wallace's Stone. In addition, the plan has a strong presumption against development which would have unacceptable visual and landscape impacts on the area.

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LDISUE: LDMI23

**Comment:**

The priorities for new infrastructure should be safe roads, pavements and sustainable drainage.

**Response:**

Comment noted.

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LDISUE: LDMI24

**Comment:**

Agree with the preferred option for dealing with energy.

**Response:**

Supporting comment is noted.

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LDISUE: LDMI25

**Comment:**

Agree with the preferred option for dealing with onshore gas, minerals and waste.

**Response:**

Supporting comment is noted.

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LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites**Comment:**

Does not support the allocation of a site at Standrigg Road, Wallacestone (site 147) for residential development. The site is an important green space, and is home to a significant amount of wildlife, including deer, badgers, foxes, birds and other animals. The development would also have an impact on views of the surrounding area. Allocation of the site would result in coalescence of villages. There are concerns about traffic into Standrigg Road, in terms of road safety and the condition of the road, as well as impacts from construction traffic. There are concerns about the impact on local infrastructure, with local Doctor's surgeries being full, and inadequate parking at Polmont Station. The development would have an impact in terms of water and drainage, and the area suffers from power outages.

**Response:**

The site is not identified for housing development in the Proposed Plan. The site would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. The site also has low accessibility due to its location in relation to local services, and the issue regarding the provision of a footway along the length of Standrigg Road.

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No. of comments: 1

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**Mr Ken Hutton**02752/FLDP\_MIR/3001/001

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LDISUE: LDMI20

**Comment:**

Need to promote oil, gas, life sciences and shipping using up to date technological knowledge. Need to improve educational attainment in STEM subjects.

**Response:**

Comment noted.

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No. of comments: 1

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**Graeme Imrie**00805/FLDP\_MIR/3001/001

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LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Objects to potential development of a site at Standrigg Road, Brightons (site 221) for housing due to impact on infrastructure and roads and loss of peaceful surroundings.

**Response:**

Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. The site is therefore not identified for housing development in the Proposed Plan.

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No. of comments: 1

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LDISUE: LDMI25**Comment:**

A separate policy on all onshore oil and gas is required recognising that this type of mineral extraction is different from other forms of extraction alongside supporting text and glossary. The full range of the potential resource should be addressed including coal bed methane, methane in mines, conventional extraction and extraction by drilling and pumping. Support for development through the LDP and the proposals map should promote opportunities for onshore oil and gas extraction and PEDL licence areas should be safeguarded. References to onshore oil and gas in the general minerals policy RW03 in LDP should be deleted.

**Response:**

The extraction of unconventional oil and gas is a minerals activity and therefore sits within the minerals policy. Specific requirements for this type of extraction are included as required by SPP. Detailing different types of extraction methods is not considered necessary. Neither SPP or NPF3 require this industry to be supported or for PEDL licence areas to be safeguarded.

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No. of comments: 1

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**James Callander and Son**02704/FLDP\_MIR/3002/001

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LDISUE: LDMI20

**Comment:**

Supports the maintenance of the current designation on Abbotshaugh Sawmill (i.e. Business Areas with Potential for Redevelopment). Company's intention is to relocate in the future. Site is fully serviced with a recent upgrade of the electricity supply.

**Response:**

Comment noted.

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No. of comments: 1

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**Mr Douglas Jardine**02894/FLDP\_MIR/3001/001

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LDISUE: LDI002

**Comment:**

The vision is full of jargon, writing in plain english would help people understand the vision and be willing to become involved in planning.

**Response:**

The Proposed Plan needs to strike a balance between being easy to understand as well as providing the required technical information.

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LDISUE: LDMI15**Comment:**

To create high quality places, involve local communities, become active within local schools and listen to residents views.

**Response:**

An extensive twelve week public consultation was undertaken for the Main Issues Report. Amongst other consultation techniques, there were twenty one Roadshow events across the Council area where views of residents were listened to.

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LDISsUE: LDMI16

**Comment:**

Guidance on new developments is a priority for green network opportunities.

**Response:**

The Proposed Plan places a strong emphasis on placemaking.

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LDISsUE: LDMI17

**Comment:**

Agree with approach in housing targets and requirements.

**Response:**

Support noted.

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LDISsUE: LDMI18

**Comment:**

Consideration should be given to removing all stalled sites.

**Response:**

It is not appropriate to remove all stalled sites. Those stalled sites which have been carried forward into the Proposed Plan are considered to be capable of yielding new homes in the period 2020-30.

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LDISsUE: LDMI19

**Comment:**

Do not think there is any opportunity to build new houses in Carron and would be reluctant to see greenfield sites in Carronshore being used for housing,

**Response:**

There are no new housing allocations in Carron or Carronshore in the Proposed Plan.

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LDISsUE: LDMI20

**Comment:**

Agree with approach to major business locations.

**Response:**

Support noted.

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LDISsUE: LDMI21

**Comment:**

Agree with approach to town centres but would suggest consideration is given to reducing local business rates to attract new shops.

**Response:**

Support noted. The control of business rates is outwith the remit of the development plan process.

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LDISUE: LDMI22

**Comment:**

Promote Blackness as a tourism opportunity which has excellent walking facilities.

**Response:**

The Proposed Plan does not make a specific reference to the tourism opportunity in Blackness, however this does not prevent proposals coming forward to enhance facilities. The opportunity for access and landscape improvements along the John Muir Way is referenced in the plan (GN01).

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LDISUE: LDMI24

**Comment:**

Agree with Energy options.

**Response:**

Support noted.

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LDISUE: LDMI25

**Comment:**

Agree with approach taken on onshore gas, minerals and waste.

**Response:**

Support noted.

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No. of comments: 11

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JJZ Property Ltd

02713/FLDP\_MIR/3002/001

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LDISUE: LDMI19      MIR2/B&B      MIR2 Bonnybridge and Banknock Sites

**Comment:**

Allocation of Cumbernauld Road (site 0114) would provide an opportunity to bring forward a small scale development that would in part replace the de-allocated site at Kilsyth Road (site 009). The development of the site would place no more additional pressure upon local services and infrastructure than the site at Kilsyth Road.

**Response:**

The site has been allocated as a new housing proposal in the Proposed Plan. Notwithstanding the various issues and constraints, the site is considered to form a suitable opportunity for small scale development south of Cumbernauld Road, contributing to choice of sites in the area. Assessment is nonetheless required to determine the impact of development on the setting of the WHS, with appropriate landscape mitigation required. Development would also have to be sympathetic to the rural nature of the site and the clustered form and character of the existing dwellings at Longcroft Holdings.

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No. of comments: 1

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LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Messrs Kelly seek the continued inclusion of a site at Hillend Farm, Slamannan (site 57) for housing. Discussion with developers and ongoing and the site is considered effective.

**Response:**

The site is not considered effective due to lack of marketability/developer interest, and numerous environmental constraints including flooding, the presence of carbon rich soil and unknown hydrological connectivity to a nearby Wildlife Site. The site is proposed for de-allocation, although a small portion of the site on Main Street is considered deliverable, and is proposed for retention as an opportunity (site 205).

No. of comments: 1

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Lorna King00846/FLDP\_MIR/3001/001

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LDISUE: LDI002

**Comment:**

I think the vision reflects what is required by Scottish Planning Policy. It is however generic (you could not recognise Falkirk from this or what is envisaged Falkirk could become). I would like to see something with more ambition.

**Response:**

Comment noted. The LDP vision is specific to the future development needs of the Falkirk Council area, taking into national and local priorities.

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LDISUE: LDMI15

**Comment:**

It is not clear how the six qualities of place making are achieved by the current existing place making policies. It would be helpful for additional tools to be available which could ensure development achieves the qualities, in particular welcoming, pleasant and distinctiveness. Development should adapt to the area rather than an area having to accommodate design based on economics. Developers could be asked to state specifically how they comply with the qualities of place making and what measures they have adopted to fit these. Falkirk already has a range of high quality areas, defined by beauty, distinctiveness, accessibility, economic opportunity. Where we have areas of high quality we should be braver about recognising and protecting them to capitalise on their attributes, rather than compromising all the time.

**Response:**

Policy PE01 is a new policy specifically setting out how new development proposals should promote the Scottish Government's six qualities of successful place as defined in Scottish Planning Policy. This overarching design policy is supplemented by other plan policies and supplementary guidance, including SG02 'Neighbourhood Design'.

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LDISUE: LDMI16

**Comment:**

The upper road in Wallacestone offers outstanding and unparalleled views across the Forth valley and also eastwards across the rolling landscape to Linlithgow and the Forth Road Bridges. It also has a semi rural character which is of great value. This area is so valuable and distinct within the Falkirk district that it is worthy of a Local Landscape Area Designation. People come to use the area to star gaze, watch sunsets, look at the view, see the snow on the hills, dog walk from Wallacestone to California to Maddiston. I would like to see this area (and Muiravonside ) valued for these specific qualities and actively promoted and used as a distinct recreation area.

**Response:**

Comment noted. Whilst it is not considered that this area merits status a local landscape area, the Council's Supplementary Guidance SG09 'Landscape Character Assessment and Landscape Designations' provides area specific guidelines to ensure that the visual and landscape impacts of development are properly considered through the planning application process. This is proposed to be carried forward into LDP2.

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**Comment:**

Regarding options for compensation for the loss of open space: the value of open space is discussed but the definition of value is not presented, it is therefore unclear if value refers to economic value, environmental value or intrinsic. It is also not clear who makes the judgement. I therefore do not agree that compensation for its loss should be reduced.

**Response:**

Policy PE16 only permits the loss of open space in limited circumstances. One of those circumstances is that the loss would be compensated by qualitative improvements to other local areas of open space. The level of compensation would be required to be proportionate to the loss of the open space. Supplementary guidance - SG05 'Green Infrastructure and Development will provide further detail on how the compensation should be calculated.

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LDISUE: LDMI17

**Comment:**

The preferred option is a pragmatic and sensible approach to meeting housing demands while minimising impacts. It's a more sustainable approach. However I would like to see more consideration to mixed housing type and influence over design to achieve targets within minimal footprint.

**Response:**

Comment noted.

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LDISUE: LDMI18

**Comment:**

Stalled sites should only be removed if there are logistical reasons which mean housing would never be realised there. If they are stalled purely for economic reasons then they should be retained as removing them will put pressure on areas less suitable and less able to accommodate development. It may be worth reconsidering the design of existing stalled sites to make their attractiveness more valuable and more complementary to the local area.

**Response:**

Comment noted.



LDISUE: LDMI19

**Comment:**

The scale of housing requirements is immense but the considerations laid out in the MIR seem to represent a pragmatic approach. The scale of housing would be more appealing if design was more suitable and sympathetic to local areas - the accepted monoculture design facilitates the loss of identity and lack of distinctiveness so valued by communities.

**Response:**

Comments noted. The Council is keen to raise the standard of design across the Falkirk Council area. LDP2 has a suite of planning policies and guidance supporting this aim.

**Comment:**

Development of the site to the south of Standrigg Road is not supported. The site is of high landscape value and development would have a major impact on its aesthetic value. Growth of the scale proposed would adversely affect the character and distinctiveness of the Wallacestone area. Standrigg Road and Sunnyside Road are unlikely to be able to accommodate the additional traffic generated by development. The fields are used by significant numbers of curlew and winter-visiting fieldfares and redstart.

**Response:**

Comment noted. The site has not been identified as a housing proposal in the Proposed Plan.

**Comment:**

It is unclear if the site is to be cleared or the Victoria Buildings themselves remain. I would like the Victoria Buildings to remain.

**Response:**

There are no current plans to demolish the Victoria Buildings, and their heritage and townscape value is acknowledged. However, they are not listed. The building's future will depend on redevelopment options for the site and the viability of retaining the structure as part of such proposals.

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LDISUE: LDMI21

**Comment:**

I would like to have seen more ambition in terms of vision for Falkirk town itself. Could we capitalise on the aesthetic qualities and support small independent shops to create a visitor attraction in the town centre? Could we focus on returning it to a retail centre? Small shops in the Cow Wynd etc. Have no visibility and little footfall - can we help with this? What about attractive independent cafes and outdoor culture? Can we take a different approach to parking? Town planning is only one tool in the box of initiatives and I would like to see this complemented by other initiatives to help the return of high street names. Many uses have left Falkirk for Stirling and Livingston and need more of a reason to come back.

**Response:**

Comment noted. LDP2 has positive planning policies encouraging and supporting uses in Falkirk Town Centre that enhance the centre's vibrancy, vitality and viability. The plan embeds the Scottish Government's town centre first principle, directing major footfall generation uses to urban centres first. Uses include retail, commercial leisure, offices, community and cultural facilities.

LDISSUE: LDMI22

**Comment:**

Improve nodular facilities to support Falkirk as a walking, recreation centre. We have great core paths, the Braes area is beautiful, the canal is great, but there are few facilities which supports family use of these. Look at parking opportunities and access points. Strategic toilets (composting if only option!) Encourage enterprise in Falkirk - cafes (floating on the canals) at strategic points etc. Tourist accomodation and tourist facilities linked to the canal network in the Wallacestone, Muiravonside and the Braes area may be appropriate.

**Response:**

Comments noted. LDP2 supports appropriate tourism development as well as active travel enhancements.

LDISSUE: LDMI23

**Comment:**

Developing the canal to create access points for kayaking/canoeing and to provide associated parking would be helpful to surrport the development of sporting infrastructure in the area.

**Response:**

Comment noted. LDP2 supports improvements to canal network. Indeed, the new plan has identified canals, specifically Falkirk Canal Corridor (GN22) and Bantaskine (GN23) as green and blue network priorities.

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No. of comments: 12

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**Klondyke Group Limited**

00471/FLDP\_MIR/3001/001

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LDISSUE: LDMI20                      MIR2/BRS              MIR2 Braes and Rural South Sites

**Comment:**

Klondyke Ltd request that the Council maintains the allocation of Beancross (Site 96) for business. Klondyke Ltd have committed to expansion within the allocated site, as evidenced by the submission of a planning application with the Council.

**Response:**

Comment noted. The site remains allocated for business in the Proposed Plan.

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No. of comments: 1

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**Land Options West**

00851/FLDP\_MIR/3003/001

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LDISSUE: LDMI19                      MIR2/BRS              MIR2 Braes and Rural South Sites

**Comment:**

Land Options West object to the non-inclusion of Parkhall North (site 141) for mixed use development. The inclusion of Parkhall North would ensure a generous supply of housing land. The site is considered effective and is in the control of parties who will release the site for development. The site is also accessible and marketable, and there is developer interest. The proposal is supported by a suite of information including a masterplan, phasing plan, Transport Statement, and landscape assessment, as well as drainage and geo-technical studies. The proposal would deliver local benefits including tourism and leisure, greenspace and a neighbourhood centre.

**Response:**

The site represents a major urban expansion, with significant landscape, ecological and green network impacts which could not be fully mitigated. Development of this scale would require up front provision of major new transport and educational infrastructure, which is likely to make the site unviable. Consequently, the site is not included as a residential allocation in the Proposed Plan.

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**Comment:**

Land Options West support the identification of a site at Parkhall North (East) (Site 142) as a preferred option for a mixed-use care village. The proposal is a logical extension to the settlement area and should continue to be identified. Para 132 of SPP also provides support for specialist housing provision and other specific needs. Land Options West submit that there is a shortfall in provision in Falkirk (Set out in Appendix 9). The submission is accompanied by a range of studies including a landscape strategy and masterplan, Landscape and Visual assessment, Transport Statement, and Ecology Assessment, which demonstrate how the site can be brought forward. The site is also considered to be effective in relation to the tests set out in PAN 2/2010.

**Response:**

The site is identified as a housing proposal specifically for amenity/elderly care in the Proposed Plan.

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No. of comments: 2

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Larbert Stenhousemuir and Torwood Community Council

00432/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

Whilst population growth has focused on the core area of Larbert/Stenhousemuir where most new homes have been built. Larbert/Stenhousemuir cannot take any more. Both Larbert High School and Kinnaird Primary have capacity issues.

**Response:**

The focus of housing growth in Larbert and Stenhousemuir in the Proposed Plan is on existing commitments carried forward from LDP1. No further significant land releases are proposed.

**Comment:**

Falkirk Council need to adopt a position on whether the recovery of unconventional oil and gas will be permitted once the Government moratorium is lifted.

**Response:**

The policies on onshore oil and gas extraction contained in the plan are in accordance with SPP. The Scottish Government's moratorium on the development of unconventional oil and gas in Scotland remains in place.

**Comment:**

The vision for Falkirk is identified as the place to be. At Hill of Kinnaird a vision of a village atmosphere and thriving community is identified, however it has shop units closing, drugs immediately available and gangs of youths terrorising local residents. Any vision needs to be backed up with resources to achieve that vision.

**Response:**

Comment noted.

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LDISSUE: LDMI16

**Comment:**

Poor level of open space found in Larbert and Stenhousemuir. Proper open space should be provided for all ages to enjoy. Support for Green Network Preferred Option (3.24).

**Response:**

Support noted. The Open Space Strategy acknowledges there is still work to be done improving the quality of open space in Larbert and Stenhousemuir. The Proposed Plan contains two significant green network opportunities relating to the settlement, River Carron Corridor Improvements (GN06) and Larbert Open Space Corridors (GN17) which seek to improve the quality and function of these corridors. Whilst not detailed in the Proposed Plan, there may be further smaller scale projects which come forward during the life of the plan.

**Comment:**

The only real open space available to residents is at Larbert Woods. No further building should be allowed to erode the woods further. Support for Preferred Option (3.27).

**Response:**

Support noted. There are no development proposals for Larbert Woods in the Proposed Plan.

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LDISUE: [LDMI18](#)

**Comment:**

Larbert North should be removed from the list of places identified as strategic growth areas. The current infrastructure issues require to be resolved before any further sites are released.

**Response:**

The Strategic Growth Area at Larbert reflects the housing land allocation at Hill of Kinnaird 1 which has been carried forward from LDP1, and continues to be built out. Larbert and Stenhousemuir is identified as having low growth potential in the Proposed Plan. There are no other significant housing allocations, with the exception of Hill of Kinnaird 2 (site 94) which is an existing business site, with the use amended to include housing / community uses. The housing capacity of this site is dependent on any residual shortfall from the originally approved 1700 house for Kinnaird Village.

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**Comment:**

Pretoria Road (Site 062) should not be developed, as care in the community should not be intruded upon.

**Response:**

Pretoria Road is an existing LDP1 site carried forward into the Proposed Plan. It has planning permission in principle.

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**Comment:**

Denny Road (Site 132) should not be developed. NHS are simply trying to make money by building houses at the furthest away point from the hospital.

**Response:**

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

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**Comment:**

No development should be allowed on Stirling Road (site 133). Any building would be intrusive for the Maggies Centre and access would be a problem as Stirling Road is at full capacity and could impact on the emergency services road.

**Response:**

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

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**Comment:**

There must not be further growth in Larbert/Stenhousemuir to the extent proposed for Kirkton Farm 1 and 2, Roughlands Farm, Bensfield Farm and Hill of Kinnaird East (sites 127, 129, 130, 131 and 134).

**Response:**

These sites have not been identified as housing proposals in the Proposed Plan.

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LDISUE: LDMI19

**Comment:**

Agree that further growth in Torwood would be inappropriate due to the limited services available.

**Response:**

There are no further housing land allocations in Torwood, other than the two sites carried forward from LDP1 at the former Torwood School (H51) and McLaren Park (H52).

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**Comment:**

No more housing on Hill of Kinnaird 2 (site 94), the site should provide accessible open space for residents. If some building must go ahead the reluctant fall-back position would be for mixed site.

**Response:**

Hill of Kinnaird 2 (site 94) is identified in the Proposed Plan as a mixed use site for housing / business / community uses. This could include further open space for residents.

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LDISUE: LDMI21

**Comment:**

The MIR identifies the Town Centre as being the first priority, it is probably too late for Stenhousemuir to take advantage of that but some consideration should be given to creating a town centre that is not simply a car park.

**Response:**

The redevelopment of Stenhousemuir Town Centre has been successful in enhancing facilities for local shopping and service needs in Larbert and Stenhousemuir. The Proposed Plan supports the future vitality and viability of local centres. Existing parking facilities are considered essential.

LDISUE: LDMI23

**Comment:**

There are no areas identified for windfarm development in the Larbert and Stenhousemuir area and that is how it should remain given the existing sites in and adjacent to the area. Windfarms should be located in areas of low population.

**Response:**

Comment noted.

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**Comment:**

The MIR states that the West Carron is one of the two main landfill sites in Forth Valley and there is no indication that this is going to change. The Community Council were under the impression that the owners of the landfill were seeking to close it and allow the site to become a recreational and landscape resource.

**Response:**

The Proposed Plan reflects the fact that West Carron is an operational waste management facility.

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LDISUE: [LDMI19](#)      MIR2/BNS      MIR2 Bo'ness Sites**Comment:**

Petition with 363 signatories objecting to the allocation of land at Crawfield Road (site 102) for housing. Site is green belt. Development of site will destroy paths rather than contribute to green network. Drainage issues in Crawfield Road should be addressed by the landowner and Council. Questions notification process. Developers should be forced to develop sites within the town rather than green belt.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

No. of comments: 1

**Mr Jim Leishman**

02770/FLDP\_MIR/3001/001

LDISUE: [LDMI19](#)      MIR2/BNS      MIR2 Bo'ness Sites**Comment:**

Objects to the allocation of land at Crawfield Road (site 102) for housing. It will involve the loss of a greenfield site, when alternative brownfield sites exist. Choice is down to the cheaper costs of developing greenfield land. Existing services - schools, transport and health - will be put under strain. There will be a huge loss of wildlife.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

No. of comments: 1

**Ms Katie Leishman**

02882/FLDP\_MIR/3001/001

LDISUE: [LDMI19](#)      MIR2/BNS      MIR2 Bo'ness Sites**Comment:**

Objects to the allocation of land for housing at Crawfield Road, Bo'ness (site 102). Site is green belt and its development will be detrimental to wildlife habitats and woodland, including Bo'mains Meadow, and will have an adverse impact on flora and fauna. The area is used for recreation by locals and tourists, and is part of the John Muir Way. Development will damage the character and amenity of established areas. Development will increase car traffic with adverse effects on pollution, parking and congestion in Linlithgow. The protection of the countryside falls within the scope of the Human Rights Act. Local infrastructure (health services, schools) cannot cope. People will go to Linlithgow for shops and services and will not contribute to the Bo'ness community.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

No. of comments: 1

|  |        |          |                                  |
|--|--------|----------|----------------------------------|
| <b>Margaret Leishman</b>   |        |          | 00242/FLDP_MIR/3001/001          |
| LDISSUE:   | LDMI19 | MIR2/BNS | MIR2 Bo'ness Sites               |
| <b>Comment:</b>  |        |          |                                  |
| Objects to allocation of land at Crawfield Road (site 102) for housing. The site is green belt. Health services in the town are over stretched. Local bus services are being cut. There will be adverse impacts on parking and traffic in Linlithgow. There will be adverse impacts on wildlife habitats and woodland, and the local nature reserve. An area of natural beauty which is used for recreation will be destroyed. Mention is made of the Human Rights Act. Development of the site could cause instability to the objector's garden and house. Drainage in the area is poor and inadequate for new housing. |        |          |                                  |
| <b>Response:</b>   |        |          |                                  |
| The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.  |        |          |                                  |
|  |        |          | No. of comments: 1               |
| <b>Mr Paul Leishman</b>  |        |          | 02883/FLDP_MIR/3001/001          |
| LDISSUE:   | LDMI19 | MIR2/BNS | MIR2 Bo'ness Sites               |
| <b>Comment:</b>  |        |          |                                  |
| Objects to the allocation of land for housing at Crawfield Road, Bo'ness (site 102). Site is green belt and its development will be detrimental to wildlife habitats and woodland. Development would surround the wildlife reserve and have an adverse impact on flora and fauna. The natural beauty of the area will be destroyed and the character and amenity of established areas damaged. It is used for walking by locals and tourists, and is part of the John Muir Way.  |        |          |                                  |
| <b>Response:</b>   |        |          |                                  |
| The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.  |        |          |                                  |
|  |        |          | No. of comments: 1               |
| <b>Ms Clare Love</b>   |        |          | 02890/FLDP_MIR/3001/001          |
| LDISSUE:   | LDMI19 | MIR2/BRS | MIR2 Braes and Rural South Sites |
| <b>Comment:</b>  |        |          |                                  |
| Objects to potential development at Standrigg Road, Wallacestone (site 221) proposed by Gladman. The road network is not adequate. Local schools are stretched. Views and wildlife will be spoiled. The quiet character of Wallacestone will be adversely affected. There are no shops within reasonable walking distance.   |        |          |                                  |
| <b>Response:</b>   |        |          |                                  |
| Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. The site is therefore not identified for housing development in the Proposed Plan.        |        |          |                                  |
|  |        |          | No. of comments: 1               |

LDISSUE: LDI002

**Comment:**

Vision seems to be drawn up by people who do not live within the communities.

**Response:**

Comment noted.

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LDISSUE: LDMI16

**Comment:**

Halt the house building, review road networks and upgrade existing green spaces and create new ones.

**Response:**

The population of Falkirk will continue to grow and the Proposed Plan aims to satisfy the projected population and household growth.

---

LDISSUE: LDMI17

**Comment:**

Agree with housing targets and requirements but more could be done by compulsory purchasing existing derelict buildings and renovating them for social housing.

**Response:**

Compulsory purchase is usually a last resort and has been used rarely and only in specific circumstances where land assembly for projects is impossible. There are other mechanisms for delivering social housing.

---

LDISSUE: LDMI18

**Comment:**

Should remove less stalled sites.

**Response:**

Stalled sites which are not considered effective housing sites and have shown little progression have been removed from the Proposed Plan. Those stalled sites which have been carried forward into the Proposed Plan are considered to be capable of yielding new homes in the period 2020-30.

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LDISSUE: LDMI19

**Comment:**

Absolutely no more housing in Larbert and Stenhousemuir.

**Response:**

The focus of housing growth in Larbert and Stenhousemuir in the Proposed Plan is on existing commitments carried forward from LDP1. No further significant land releases are proposed.

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LDISSUE: LDMI20

**Comment:**

Agree with approach to major employment sites but only if these are backed up with transport and bus links. Many people still do not have cars.

**Response:**

Support noted.

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LDISUE: LDMI21

**Comment:**

The town centre is a shambles and restricted parking access only makes visiting the high street worse. Suggest improving parking and reducing business rates. Nothing in the MIR that would make it better.

**Response:**

Parking regulations and business rates are outwith the remit of the local development plan.

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LDISUE: LDMI22

**Comment:**

Before any further tourism promotion, transport and parking should be sorted out.

**Response:**

The infrastructure, design and implications of new tourism proposals are considered through the planning application process.

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LDISUE: LDMI23

**Comment:**

Guidance to developers should include provision for intervention if proposals don't benefit the community. Kinnard village shops are not filled because the developer will only allow chain stores. Given many small businesses can't get access, local businesses in the community should have been a priority.

**Response:**

The mechanisms for intervention do not exist through the development plan system. The take up of commercial operations is market dependent.

LDISUE: LDMI24

**Comment:**

Agree with energy options.

**Response:**

Support noted.

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LDISUE: LDMI25

**Comment:**

Agree with approach on onshore gas, minerals and waste.

**Response:**

Support noted.

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LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Does not support allocation of new site at Standrigg Road 2 (Site 221). Wallacestone Primary School is at capacity and Maddiston Primary School is under increasing pressure as a result of development at East Maddiston. There would also be pressure on Braes High School. Road safety is an issue, and children are required to cross busy roads with a decreased presence of crossing patrols. The bend in the road adjacent to the cricket ground is also dangerous.

**Response:**

Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. The site is therefore not identified for housing development in the Proposed Plan.

No. of comments: 1

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LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Mr MacPherson does not support any development at Standrigg Road 2 (site 221). Wallacestone Primary School is at capacity, Maddiston Primary School and Braes High School is also under increasing pressure. Standrigg Road is not suitable for increased traffic, in part to the the ben in the road adjacent to the cricket club. Parts of the road have no pavement, and there are safety issues for pedestrians. There is also limited parking at Polmont Station. Green spaces play an important role in community well being and further designation of nature areas and open spaces would be welcomed.

**Response:**

Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. The site is therefore not identified for housing development in the Proposed Plan.

No. of comments: 1

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LDISSUE: LDMI15

**Comment:**

Maddiston Community Council support the MIR's preferred option for 'place statements'. They feel that all communities are unique and it is important that this is taken into consideration in the LDP. Local knowledge, which comes from consulting with communities, can be a great benefit for future planning.

**Response:**

Supplementary Guidance relating to place statements is not being taken forward at this stage, due to the potential for overlap and confusion with local place plans which are proposed through the Planning Bill, and other community planning processes ongoing at present.

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LDISUE: LDMI16

**Comment:**

Maddiston Community Council advise that the proposal for a possible community growing area at Muiravonside should reflect that this is already established by Maddiston Community Council. Figure 3.2 also identifies the opportunity for a growing area at California Road. This would be unlikely to gather community support. This area has drainage issues, which would not be an advantage in a growing area and is one of the few sports pitches in the area.

**Response:**

Comment noted. The design and exact location of community growing areas will be subject to further consultation and refinement. Comment noted in relation to Muiravonside.

LDISUE: LDMI19

**Comment:**

Maddiston Community Council would like to see a greater variation in the types of properties being built in the area. Alongside affordable housing, we consider there is a need for flats, smaller starter properties and bungalows. Housing for older people would decrease the burden on the primary school but still allow development to continue. It would also help to create a more diverse and resilient community.

**Response:**

The Proposed Plan seeks to identify a range of sites across the Council area. The exact development mix in private housing is usually determined by developers subject to market demand, although in the case of RSL and Council housing, house sizes are tailored to known need in the community. Provision has been made for elderly housing through the allocation at Parkhall North (East).

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**Comment:**

Maddiston Community Council fully support the LPD2 statement in paragraph 4.30 to reserve the former Fire Station HQ for employment and community. The site has been the source of economic activity in the community for over 100 years. House building on the Fire Station HQ site would remove one of the last open spaces in our community that would be suitable for future facility planning.

**Response:**

Maddiston Fire Station is identified in the Proposed Plan for community, employment and retail use.

**Comment:**

Maddiston Community Council support the proposal for a retirement village at Parkhall North West (Site 189), which limits further house development in LDP2 to a residential care village. This development will have much less impact on the school and roads than the other sites and has opportunities to bring new facilities to the area.

**Response:**

Support noted.

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LDISUE: LDMI23

**Comment:**

Maddiston Community Council support the Council's recognition of school capacity issues in the Maddiston area.

**Response:**

Support noted.

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**Comment:**

Maddiston Community Council are concerned at the levels of traffic in the area as a result of ongoing development and a growing community. This area has no controlled crossing or traffic calming measures yet the volume of local traffic has substantially increased.

**Response:**

Significant development proposals will generally be accompanied by a Transport Assessment which will assess impact on the local road network, and determine required mitigation.

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|                           |  |                         |   |
|---------------------------|--|-------------------------|---|
|                           |  | No. of comments:        | 7 |
| <b>Malcolm Whitecross</b> |  | 02918/FLDP_MIR/3001/001 |   |

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LDISSUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Malcolm Whitecross have recently submitted a Proposal of Application Notice for the development of land at Whitecross (Site 076). The intention is to submit a planning application in principle later this year.

**Response:**

Comment noted. The part of the Whitecross site promoted by Malcolm Whitecross has been retained as a housing proposal in the Proposed Plan.

**Comment:**

Seeks the inclusion of the former Thermalite site in South Alloa (site 215) as a housing allocation (70 units). If its inclusion is questioned it is requested that the settlement boundary of South Alloa is extended to include all of the site.

**Response:**

The former Thermalite site in South Alloa is not identified as a housing proposal in the Proposed Plan. There are flood risks associated with the site and education capacity constraints in the catchment schools of Airth Primary School and Larbert High School. It also lacks mains sewerage. The brownfield section of the site is included within the village limit of South Alloa. There is no justification for including the greenfield element of the site within the village limit.

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|                          |  |                         |   |
|--------------------------|--|-------------------------|---|
|                          |  | No. of comments:        | 2 |
| <b>Manor Forrest Ltd</b> |  | 00455/FLDP_MIR/3003/001 |   |

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LDISSUE: LDI002

**Comment:**

Statement that 'levels of house building within the Falkirk Council area have not returned to the levels which were seen prior to the recession' provides no recognition of the role that the Council has to play in terms of ensuring that the emerging plan does all that can to assist the house building industry in delivering to true scale of housing that is required to meet the housing demand.

**Response:**

The Proposed Plan has identified a generous supply of sites with flexibility to meet future demand for new homes within the Council area.

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**Comment:**

The Council must recognise that areas with strong market demand have a vital role to play in meeting future housing demand. Suitable investment must be made in the local infrastructure that is required to support future development within these areas. Developer contributions must be managed properly to address infrastructure constraints.

**Response:**

Comments noted. The Council seeks to allocated a wide range of effective sites across the Council area, where there is adequate infrastructure capacity. The Council will prepare and consult upon new Supplementary Guidance on Developer Contributions as part of LDP2.

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LDISSUE: LDMI15

**Comment:**

Supports the alternative option for continuing the existing design policies, rather than consolidating into one policy. This enables applicants to focus on most relevant issues.

**Response:**

Consolidation of policies is considered the best approach, and the simplest for potential applicants. Policy PE01 within the Proposed Plan seeks to ensure that Scottish Government Policy 'Designing Streets' and the six qualities of successful places are reflected in the Proposed Plan, and emerging Supplementary Guidance.

**Comment:**

'Place Statements' should be included in the Plan, not in SG's so as to ensure independent scrutiny. They should also involve landowners, not just communities.

**Response:**

Supplementary Guidance relating to place statements is not being taken forward at this stage, due to the potential for overlap and confusion with local place plans which are being proposed through the Planning Bill, and with community planning processes..

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LDISSUE: LDMI17

**Comment:**

Objects to the decrease in housing land supply target. It will result in a further contraction in the delivery of much-needed housing across the Council area. There should also be no decrease in the flexibility allowance. There are uncertainties surrounding larger sites so a higher flexibility allowance of 20% can be justified.

**Response:**

The Housing Need and Demand Assessment (HNDA) identifies a housing need at 418 homes per year. The Council has increased this to a housing target of 450 homes per year over the period 2020-2030. While this is a reduction from LDP1, the target is higher than the HNDA estimate and more closely reflects current population trends: lower household projections and a general slowdown in household formation. This figure, however, is still a very substantial level of housing for the Falkirk Council area. The Proposed Plan has applied a 14% generosity allowance to the housing supply target. This level is within the margin of generosity (10 to 20%) that SPP requires to be added to ensure a generous supply of land.

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**Comment:**

The key to delivering affordable housing is by supporting delivery of mainstream market housing. The threshold of 20 units remains appropriate for the provision of affordable housing. However, a single quote requirement of 15% should be applied.

**Response:**

Comment noted. LDP2 carries forward LDP1's requirements for affordable housing provision. It is considered appropriate to maintain different quotas for different areas, to reflect different degrees of need.

**Comment:**

The inclusion of an “alternative sites” policy within the emerging plan will play a vital role in ensuring that the Council can (in line with SPP) take such measures to ensure a minimum five year effective supply of housing land.

**Response:**

Comment noted. Policy HC01 includes this provision.

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LDISSUE: LDMI18

**Comment:**

Conditionally support de-allocation of stalled sites on the condition that these sites are replaced by new allocations of equivalent capacity.

**Response:**

Comment noted.

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**Comment:**

The deliverability, even in the longer term, of Bo’ness Foreshore is highly questionable, and that as such, it is submitted that they should not be included within the list of Strategic Growth Areas to be carried forward into LDP2.

**Response:**

The Bo’ness Foreshore site has not been identified as a proposal in the Proposed Plan.

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LDISSUE: LDMI19                      MIR2/B&B      MIR2 Bonnybridge and Banknock Sites

**Comment:**

Supports the allocation of Broomhill Road 1 (site 010) for housing. The site is effective as a standalone site and could deliver up to 30 units.

**Response:**

Support noted.

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**Comment:**

Objects to the non-inclusion of Milnquarter Farm (site 178) for housing. In 2016, the reporter found the site to be sustainable in light of concerns relation got flooding, drainage, environmental designations, access the the need for housing. The site can be developed to minimise impact on cultural heritage.

**Response:**

The potential for the proposed scale of development to adversely impact on the Antonine Wall World Heritage Site and the likely need for off-site junction improvement in the local road network are considered to be major factors constraining the effectiveness of the site. The site is therefore not included as a residential allocation in the Proposed Plan. The site is to be retained within the urban limit and could come forward as a windfall site if a way of overcoming the constraints can be found.

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**Comment:**

Supports the de-allocation of East Bonnybridge (site 077) due to surrounding hazardous land uses.

**Response:**

The East Bonnybridge site is identified in the Proposed Plan for mixed-use development. The gas pipelines running through the site are considered to be a major factor constraining its effectiveness, although investigations are ongoing regarding potential solutions. Therefore whilst the site is carried forward into the proposed Plan, allowing further time for these investigations, the site will not contribute to the housing land supply for the time being.

**Comment:**

Whitecross New Settlement (Site 076) is not effective and should be de-allocated. The effectiveness is restricted as the site is landlocked by access restrictions. Some industrial uses may be appropriate but scope for housing is limited. Housing should be allocated on more deliverable and marketable sites.

**Response:**

The Whitecross proposal has been subject to review, and the Proposed Plan now includes a much reduced housing proposal which is considered to be more realistic and deliverable, with reduced infrastructure requirements. It is considered that this is effective in the period of the plan.

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**Comment:**

Objects to the non-inclusion of Polmont Park (site 195) as a preferred site for housing. The site is effective and sustainable, and will integrate sensitively with the surrounding area. The green belt in this area has already been eroded with Weedingshall cemetery extension and, identified development sites at Beancross.

**Response:**

Site represents a significant intrusion into the green belt which is likely to weaken its integrity and undermine green belt objectives at this location. There will be landscape impacts, including potential impacts on the setting of the Antonine Wall WHS (the site lies within the Buffer Zone). The site is not included as a residential allocation in the Proposed Plan.

**Comment:**

Objects to non-inclusion of Parkhall Farm North (Site 141) as a preferred site for mixed use development. The site would see a natural extension of Maddiston to the A801, and deliver strategic infrastructure priorities set out in the Maddiston East Development Framework in terms of a link to the A801.

**Response:**

The site at Parkhall North represents a major urban expansion, with significant landscape, ecological and green network impacts which could not be fully mitigated. Development of this scale would require up-front provision of major new transport connections and educational infrastructure in the form of a new primary school, which is likely to make the site unviable. Consequently, the site is not included as a residential allocation in the Proposed Plan.

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**Comment:**

Supports allocation of Parkhall Farm 2 (site 033) as it forms part of a wider masterplan for the area.

**Response:**

Support noted.

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**Comment:**

Supports allocation of Parkhall Farm 4 (site 035).

**Response:**

Support noted.

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**Comment:**

Manor Forrest question the number of units allocated for Parkhall Farm 3 (site 034) and the Haining (site 036) in light of constraints in terms of trees, listed building, and flooding, and reliance on 3rd party access.

**Response:**

Comments noted. The estimates for the capacity of these sites are considered reasonable, pending further investigations into access and environmental constraints.

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**Comment:**

In light of the proposed de-allocation of Slamannan Road 1 (site 053), Slamannan Road 2 (site 054) should be extended. This would enhance the green network, by integrating within forestry along the western boundary, and deliver key infrastructure to the village.

**Response:**

The extension of Slamannan Road 2 is not supported in the Proposed Plan. It would extend the current brownfield allocation into greenfield land. It does not represent a good fit with the existing settlement form. Existing allocated sites in the village have remained undeveloped due to low market demand, so there is no justification for increasing the size of the site.

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**Comment:**

The deliverability, even in the longer term, of Whitecross is highly questionable, and that as such, it is submitted that they should not be included within the list of Strategic Growth Areas to be carried forward into LDP2.

**Response:**

The Whitecross site allocation has been reduced to a more modest and deliverable level.

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**Comment:**

A site at Parkhall North-West (189) should be allocated for housing for between 200-250 houses. The site is deliverable, and in single ownership, and would offer a sustainable settlement extension. The site would meet the provisions of the Maddiston East Development Framework in terms of constraints and access.

**Response:**

The site is not identified as a housing proposal in the Proposed Plan. Reasons include significant landscape impacts, and school capacity issues at Maddiston Primary School. There is a concern that a required second access would negatively impact on the site's effectiveness. Furthermore, the Proposed Plan has allocated enough sites in the right places with flexibility to meet the housing land requirement. No further releases are needed.

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LDISUE: LDMI20                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

The Council should retain Gilston (Site 95) as business land as there will be conflict between housing and business uses.

**Response:**

Gilston is retained exclusively for economic development in the Proposed Plan due to its strategic importance as an employment site.

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**Comment:**

Objects to non-inclusion of Grandsable Road (site 137) as a preferred site for employment and tourism uses. The site to the east (Beancross) is a recognised opportunity and site 137 should be afforded the same status.

**Response:**

The distillery has been granted planning permission and is currently under construction. However, the site is identified in the Proposed Plan as as a proposal for business and tourism, to recognise the opportunity for further investment in the distillery. The site is retained within the green belt. Any further development would need to be carefully assessed against Antonine Wall, flooding and green belt policies.

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LDISUE: LDMI23

**Comment:**

A site at Land North of Shamistle should be identified in table 6.1 in the list of infrastructure proposals for the provision of a distributor road. The approved Maddiston East Development Framework identifies the need for the provision of a new road linking the consented A801 roundabout to Glendevon Drive.

**Response:**

The route of the road as proposed would have significant landscape, ecological and heritage impacts. If a connection from Glendevon Drive to A801 is required, then this would be the subject of further detailed assessment to determine the exact line of the route. There are also questions over deliverability in terms of the link to allocated and proposed development sites. The proposed site is therefore not included as an infrastructure proposal in the Proposed Plan.

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No. of comments: 24

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**Ms Pamela Manson**

02914/FLDP\_MIR/3001/001

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LDISUE: LDMI25      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Do not agree with removing the site safeguarding for additional landfill capacity. The Avondale site (0097) creates a lot of blown rubbish from lorries and the smell can be noxious. If the safeguarding was relaxed the problem would increase. We live here to enjoy the semi-rural location and not to have a landfill site nearby becoming a problem.

**Response:**

The removal of the site safeguarding means that the area of land identified for a potential extension of the landfill site will no longer be contained within the Plan.

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No. of comments: 1

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**Ms Patricia Marr**

02594/FLDP\_MIR/3001/001

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LDISUE: LDMI19      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Objects to allocation of land at Crawfield Road (site 102) for housing. Council should look at other areas of the town for development instead (e.g. derelict site near fire station).

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release. The site at Crawfield Lane which is mentioned has been included in the Proposed Plan as a mixed use site with potential for housing, providing flexibility to encourage its redevelopment.

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No. of comments: 1

LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Objects to potential residential development site at Standrigg Road, Wallacestone (site 147). Housing will take up a large area of green belt and adversely impact on wildlife and countryside recreation. Standrigg Road and surrounding area are not built to cope with the huge increase in traffic that will result. Local infrastructure such as schools, GP surgeries, Polmont rail station parking, and electricity supply network cannot support this development. Extensive development in the Braes has been ongoing for some time.

**Response:**

The site is not identified for housing development in the Proposed Plan. The site would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. The site also has low accessibility due to its location in relation to local services, and the issue regarding the provision of a footway along the length of Standrigg Road.

No. of comments: 1

LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Objects to potential residential development site at Standrigg Road, Wallacestone (site 147). Housing will take up a large area of green belt and adversely impact on wildlife and countryside recreation. Standrigg Road and surrounding area are not built to cope with the huge increase in traffic that will result. Local infrastructure such as schools, GP surgeries, Polmont rail station parking, and electricity supply network cannot support this development. Extensive development in the Braes has been ongoing for some time.

**Response:**

The site is not identified for housing development in the Proposed Plan. The site would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. The site also has low accessibility due to its location in relation to local services, and the issue regarding the provision of a footway along the length of Standrigg Road.

No. of comments: 1

LDISSUE: LDMI19      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Objects to allocation of Crawfield Road site (site 102) for housing. There are other areas within Bo'ness which could be used for development without building on green belt.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

No. of comments: 1

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LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Mr McCarroll seeks the inclusion of a site at Station Road, Polmont (site 136) for housing development. The site is deliverable and effective. The site also benefits from high accessibility, being close to Polmont Station. The development would also deliver enhances public open space, path connections and additional community parking for the train station. Vehicular access can be achieved by a suitably designed burn crossing, and the development would not significantly affect the local road network, as evidenced by the supporting transport statement.

**Response:**

The site is not identified for housing development in the Proposed Plan. The site is an important part of the green network and contributes to the setting and rural character of the Union Canal. Securing a satisfactory access into the site is problematic, given the nature of Station Road at this point, likely need for additional land to be acquired to form an access, and impact on the Polmont Burn corridor.

No. of comments: 1

**Mr & Mrs D McCormack**

02766/FLDP\_MIR/3001/001

LDISSUE: LDMI22      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Concerned about any potential change of use at Kinneil walled garden on grounds of security for their property which backs on to the walled garden; drainage issues, with surface water coming into their garden from the walled garden; traffic and parking, with traffic spoiling the estate and no facilities for increased parking; and lack of toilet facilities. Allotment use unsuitable because there is no earth and there is allotment provision nearby at Rouken Glen. Consultation with residents in the estate is poor. Housing would be a preferred use.

**Response:**

The site at Kinneil Walled Garden is included as an opportunity for community growing and a potential tourism opportunity in the Proposed Plan. It is considered that there is scope for these uses without significant detriment to the amenity of adjacent residential properties. Nonetheless, the issues listed are noted, and will be considered in determining the scope of detailed proposals.

No. of comments: 1

**Mr Gordon McKean**

02900/FLDP\_MIR/3001/001

LDISSUE: LDI002

**Comment:**

The vision is a fine one, if only if it can be made to happen.

**Response:**

Comment noted.

LDISSUE: LDMI16

**Comment:**

Bo'ness Foreshore could be made a more attractive place to visit, if it is not to be used for housing.

**Response:**

Comment noted. The Council has already invested in some improvements such as path upgrading and wild flower seeding. There is potential for further improvements, as highlighted in the Open Space Strategy.

LDISUE: LDMI18

**Comment:**

More effort should be made to get stalled sites developed. Bo'ness Foreshore is a prime example. A development there would benefit the entire town and revitalise the town centre.

**Response:**

Whilst the potential benefits of the development at Bo'ness Foreshore are acknowledged, the site is not considered likely to be deliverable in the plan period due to constraints, high development costs, low marketability and consequent viability issues. Consequently, it has been de-allocated. It will remain as open space, however, and if market conditions change significantly, redevelopment options could be considered again in the future.

LDISUE: LDMI19

**Comment:**

Housing on greenfield sites around Bo'ness will just be dormitories. Green belt was designated for a reason, so how can the designation be changed.

**Response:**

Scottish Planning Policy requires green belt boundaries to be reviewed, where necessary, as part of the development of the spatial strategy of the development plan. However, the option of releasing land at Crawfield Road for housing, which was the preferred approach at the MIR stage, has not been carried through into the Proposed Plan, and the green belt remains unchanged.

LDISUE: LDMI20

**Comment:**

Questions how housing at business locations helps create more businesses. Ineos would not define new business development at a recent meeting.

**Response:**

Housing is being considered as part of the development mix at allocated business sites given the extent of the business land supply, and the pressing need to find sustainable locations for new housing.

LDISUE: LDMI21

**Comment:**

There is too much emphasis on Falkirk Town Centre. Bo'ness and other smaller town centres are dying.

**Response:**

All town centres in the area face challenges. District centres such as Bo'ness, Stenhousemuir and Denny have seen investment over recent years under the Council's Town Centres' Strategy. There is a need for a focus on Falkirk Town Centre because of its importance to the economy of the whole Council area.

LDISUE: LDMI25

**Comment:**

Fracking should be resisted. Recycling is supported, but some landfill sites will always be required.

**Response:**

The Scottish Government has continued its moratorium on the granting of consents for the extraction of unconventional oil and gas. In the meantime, the Proposed Plan reflects the guidance in Scottish Planning Policy.

|   |        |          |                         |
|---|--------|----------|-------------------------|
| Ms Margaret McMillan  |        |          | 02749/FLDP_MIR/3001/001 |
| LDISSUE:  | LDMI19 | MIR2/BNS | MIR2 Bo'ness Sites      |
| <b>Comment:</b>   |        |          |                         |
| Objects to the allocation of land for housing at Crawfield Road (site 102) due to loss of green belt land, increase in traffic on Crawfield Road, limited bus service on Crawfield Road, current pressure on health services, flooding issues on Crawfield Road, future parking problems on Crawfield Road, and safety issues for existing schools because of busy roads in the area. |        |          |                         |
| <b>Response:</b>  |        |          |                         |
| The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.   |        |          |                         |
|   |        |          | No. of comments: 1      |
| Mr & Mrs William McNee  |        |          | 02815/FLDP_MIR/3001/001 |
| LDISSUE:  | LDMI19 |          |                         |
| <b>Comment:</b>   |        |          |                         |
| Too many houses are being built in the Brightons and Wallacestone area. Schools and doctors' surgeries cannot cope. Sunnyside Road is so busy with traffic.   |        |          |                         |
| <b>Response:</b>  |        |          |                         |
| The Proposed Plan does not propose further growth within the Brightons and Wallacestone areas.  |        |          |                         |
|   |        |          | No. of comments: 1      |
| I D McSpurle  |        |          | 02901/FLDP_MIR/3001/001 |
| LDISSUE:  | LDI002 |          |                         |
| <b>Comment:</b>   |        |          |                         |
| The vision is great, but it is very far removed from reality.   |        |          |                         |
| <b>Response:</b>  |        |          |                         |
| Comment noted.  |        |          |                         |
| LDISSUE:  | LDMI15 |          |                         |
| <b>Comment:</b>   |        |          |                         |
| To create high quality places there is a need to listen to the people who live and work there.  |        |          |                         |
| <b>Response:</b>  |        |          |                         |
| Comment noted.  |        |          |                         |
| LDISSUE:  | LDMI16 |          |                         |
| <b>Comment:</b>   |        |          |                         |
| Callendar Park is in a poor state and should be a priority for investment to turn it back into a 'destination' park.  |        |          |                         |
| <b>Response:</b>  |        |          |                         |
| Callendar Park and Wood is identified as green network opportunity in the Proposed Plan. Masterplans have also been prepared by the Falkirk Community Trust and Forestry Commission in which opportunities for improvement have been identified.  |        |          |                         |

LDISUE: LDMI17

**Comment:**

Housing targets should not be reduced. The number of social houses proposed is too low.

**Response:**

The housing supply target has been set at 450 houses per annum in the Proposed Plan. This reflects the HNDA and the reduction in the projected rate of household growth.

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LDISUE: LDMI19                      MIR2/FAL      MIR2 Falkirk Sites

**Comment:**

There should be a greater housing content in the Falkirk Gateway site (site 80).

**Response:**

A notional figure of 100 houses has been identified for the Falkirk Gateway in the Proposed Plan which is considered ambitious. It is important that the scale of residential use does not detract from the business and commercial potential of the site.

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LDISUE: LDMI20

**Comment:**

There should be room for housing within the Grangemouth Docks area. The Falkirk Gateway should not be removed as a Commercial Centre - it should be a mixed use retail area, as well as leisure/amenities and housing.

**Response:**

Housing in Grangemouth Docks would not be compatible with the operation of the port and is not likely to be acceptable in terms of adjacent major hazards. The Falkirk Gateway has been removed as a commercial centre to reflect the fact that retailing is not expected to play such a prominent role in the mix. There is still likely to be an element of retail.

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LDISUE: LDMI22

**Comment:**

Callendar Park could be regenerated and the attractions at Callendar House upgraded.

**Response:**

Callendar Park and Wood is identified as green network opportunity in the Proposed Plan. Masterplans have also been prepared by the Falkirk Community Trust and Forestry Commission in which opportunities for improvement have been identified.

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LDISUE: LDMI25

**Comment:**

Fracking or any form of unconventional gas extraction is not supported.

**Response:**

The Scottish Government's moratorium on the granting of consent for extraction of unconventional oil and gas has been continued. In the meantime, the relevant policies in the Proposed Plan reflect the provisions of Scottish Planning Policy.

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No. of comments: 8

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LDISSUE: [LDI002](#)

**Comment:**

The vision speaks about green space which I support, this is why more houses in greenspace areas should not be allowed. The town centre also needs to be developed for any expansion to be successful.

**Response:**

Comments are noted.

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LDISSUE: [LDMI15](#)

**Comment:**

Providing better transport links which link places together would help to create high quality places.

**Response:**

Comment noted. LDP2 requires development to be designed to encourage the use of active travel and sustainable, integrated transport.

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LDISSUE: [LDMI16](#)

**Comment:**

Local parks and heritage places like Callendar Park and House are key priorities for Falkirk.

**Response:**

Comment noted. The Council has an adopted open space strategy which sets detailed priorities for the enhancement of parks across the Council area.

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LDISSUE: [LDMI17](#)

**Comment:**

The affordable housing target should be much higher.

**Response:**

Comment noted. The housing supply target is based on a detailed assessment of future need and demand for housing in the Council area.

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LDISSUE: [LDMI18](#)

**Comment:**

More stalled sites should be removed.

**Response:**

Comment noted.

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LDISSUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

The proposed housing site in Standrigg Road, Brightons (Site 147) will destroy the semi rural character which makes the area such a beautiful place to live.

**Response:**

Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. The site is therefore not identified for housing development in the Proposed Plan.

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LDISSUE: LDMI20

**Comment:**

I agree with the preferred option for dealing with our major employment sites.

**Response:**

Support noted.

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LDISSUE: LDMI21

**Comment:**

The preferred option for dealing with out town centres sounds reasonable. The town centre needs a boost, otherwise it will disappear completely.

**Response:**

Support noted.

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LDISSUE: LDMI22

**Comment:**

Having an all in one ticket for all the Council's tourist attractions would enhance the amount of visitors to the area.

**Response:**

Comment noted. This is not a matter for LDP2 to address.

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LDISSUE: LDMI23

**Comment:**

New paths and outdoor facilities at reasonable prices for the locals is extremely important

**Response:**

Comment noted.

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LDISSUE: LDMI24

**Comment:**

Agree with the preferred options for the issue of energy.

**Response:**

Support noted.

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LDISSUE: LDMI25

**Comment:**

Don't agree with the removal of site safeguarding at Avondale as this site is already causing air pollution.

**Response:**

LDP1 safeguards land for a future expansion of the Avondale Landfill site. However, this land is no longer required as less waste will be landfilled in future years. LDP2 has subsequently removed the safeguarding of the site. SEPA monitors Avondale Landfill site in line with the site's waste management licence.

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No. of comments: 12

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Miller Homes

02869/FLDP\_MIR/3001/002

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LDISSUE: LDMI17

**Comment:**

There are issues with the methodology used by the Council to define the housing supply target. This does not accord with the HNDA and does not provide programming of the established land supply. Analysis shows that there is a considerable shortfall in the scale of new housing allocations required to meet housing land requirements in full. This means that the Council may not be maintaining a 5 year effective housing land supply from the adoption of LDP2.

**Response:**

The methodology used to define the housing supply target was appropriate and in accordance with Scottish Planning Policy. Allocations have been made in the Proposed Plan to meet the housing land requirement including 14% flexibility.

**Comment:**

In relation to affordable housing, the alternative option of relaxing the affordable housing policy should be adopted. Aligning affordable housing requirements with locational need would reflect the five tests in Circular 3/2012 more closely.

**Response:**

The current affordable housing policy has been carried forward into the Proposed Plan. The HNDA has demonstrated that there is a continuing need for substantial affordable housing in the Falkirk housing market area overall. Relaxing the requirement on individual private sites would make it less likely that the affordable housing target would be met.

LDISSUE: LDMI18

**Comment:**

There are concerns with the deliverability of larger scale stalled housing sites. The reprogramming of sites, and the impact on meeting the housing land supply, is not clear. These sites should not contribute to meeting the housing land requirement, but should remain as additional allocations to provide long term range and choice of sites. Additional sites will therefore be required.

**Response:**

The existing land supply has been subjected to a rigorous appraisal, and sites which are not considered deliverable in the initial 10 year period of the plan have been removed from the supply, or de-allocated altogether. Reprogramming has been factored into the calculation of the output of sites during the initial 10 year period of the plan.

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**Comment:**

Promotes allocation of land for housing at North Bank Farm, Bo'ness, including three parcels of land (Options A, B and C). A Development Framework Report is submitted which demonstrates that the site would form a logical and sustainable expansion to the existing settlement, with capacity in the area to accommodate any of the three options presented. A Site and SEA Assessment Review highlights that the site scores favourably compared with other options in Bo'ness. A Statement of Site Effectiveness report concludes that the site would be effective and deliverable in the plan period.

**Response:**

The site at North Bank Farm has not been identified as a proposal in the Proposed Plan. A strategy of consolidation is proposed in Bo'ness, with no further allocations over and above existing commitments. The existing sites which form part of the Bo'ness South East Strategic Growth Area provide for a substantial level of growth in the town over the plan period, and the completion of the Drum development is considered the priority. This site is not considered to be an appropriate location given potential landscape impacts, access issues, low accessibility, and capacity issues in the local primary school.

LDISUE: LDMI23

**Comment:**

Development contributions should not be utilised to provide services such as healthcare which are centrally funded and would not accord with the five tests set out in Circular 3/2012. The alternative approach to infrastructure delivery set out in the MIR, i.e. a global infrastructure levy, is opposed, until such time as the legislative position is clear.

**Response:**

Healthcare infrastructure continues to be identified as an area where developer contributions may be sought. There is no reason why such contributions could not, in appropriate circumstances, meet the terms of Circular 3/2012. The Council agrees that further consideration of a global infrastructure levy should await the relevant legislative provisions coming through the Planning Bill.

LDISUE: LDMI24

**Comment:**

In relation to requirements arising from Section 72 of the Climate Change Act, although this is a policy requirement, the Council should continue to adopt a flexible approach to this policy by reviewing the scope of exemptions. Consistency between planning policy and Scottish Building Regulations should be established.

**Response:**

The policy on low and zero carbon generating technologies (LZCGT) has been carried through into the Proposed Plan. There is flexibility in the policy in that developers can identify practical or technical constraints which limit the application of LZCGT in their developments.

LDISUE: LDI002

**Comment:**

Vision sounds good, although housing at Standrigg Road, Wallacestone would not fit with it.

**Response:**

Neither of the sites proposed for development at Standrigg Farm or Standrigg Road are included in the Proposed Plan. The sites would represent a substantial extension of the Wallacestone/Rumford urban area, and growth is focused elsewhere, including at Maddiston East within the near vicinity. The local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. The site is therefore not identified for housing development in the Proposed Plan.

LDISUE: LDMI15

**Comment:**

More consultation with local residents would help. Use local enhancements as volunteering opportunities.

**Response:**

Comment noted. There will be further opportunities to become involved in the Plan process, and preparing Place Statements for settlements.

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LDISUE: LDMI16

**Comment:**

The greenspace at the Wallace Stone is in need of improvement.

**Response:**

Comment noted. Wallacestone Park is identified in the Falkirk Open Space Strategy as an opportunity for improvement.

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LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Objects to the potential development site at Standrigg Road 2, Wallacestone (site 221) for housing. The country road is already very busy and would not be safe for more traffic. There are no road markings or pavements. Wallacestone PS is at capacity, The land is currently farm land and a lovely greenspace.

**Response:**

Standrigg Road (Site 221) site would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. The site is therefore not identified for housing development in the Proposed Plan.

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LDISUE: LDMI23

**Comment:**

There are a lot of potholes in the local roads.

**Response:**

Comment noted. Maintenance of the local road network falls outwith the remit of the planning system. Specific concerns should be directed to the Roads Maintenance teams.

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LDISUE: LDMI15

**Comment:**

High quality places can be established by clever design and an appreciation of the local context. Targeted strategic growth in the right areas can help to support high quality design and 'placemaking'.

**Response:**

Comment noted.

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LDISUE: LDMI16

**Comment:**

Connectivity to the wider green network is important to encourage sustainable travel links as well as supporting people's ability to choose a range of active travel methods. If a development is within an area of greenspace, it is important to provide links to this area so that it can be enjoyed for a variety of leisure purposes.

**Response:**

Comment noted. Policy PE01 requires development to be designed to encourage the use of active travel and sustainable integrated transport.

LDISUE: LDMI17

**Comment:**

The reduction in the rate of growth is a step in the wrong direction by Falkirk Council, with figures having been generated using older statistical information from 2012. Furthermore larger strategic allocation sites which have not come forward, do not justify a reduction in the numbers of allocation but reflect the sites being unviable to developers. This could be because they are not in an area of current market demand, constrained by infrastructure/contamination issues or even constrained by ownerships/legal issues.

**Response:**

The HNDA identified housing need at 418/yr and we have increased this to a housing target of 450/yr as part of the Proposed Plan. The HNDA which the Proposed Plan is based on is dated May 2016 and was declared "robust and credible" by the CHMA(Centre for Housing Market Analysis) which is a division of the Scottish Government. A number of sites, including large, strategic sites, have been re-appraised and re-programmed, or removed under the Proposed Plan to ensure continued deliverability.

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LDISUE: LDMI18

**Comment:**

Although it is a positive move that Falkirk Council are looking to remove larger strategic sites which have not come forward, this should not reflect a reduced demand to build within Falkirk Council, and rather highlights the ineffectiveness of the allocation in the first place. These sites should be removed as they are contributing nothing to the effective housing land supply. Sometimes larger allocated sites can have a greater risk exposure which reduces their likelihood of coming to fruition. Specifically this can be because in order to take on a site of this magnitude it involves a lot of unknown risks. Therefore a range of sizes of allocated sites can be useful in stimulating development over multiple areas. This will help to support developers across the development industry and help them to secure the necessary funds to carry out a development.

**Response:**

A number of sites, including large, strategic sites, have been re-appraised and re-programmed, or removed under the Proposed Plan to ensure continued deliverability. The Council will continue to explore delivery and funding mechanisms such as the Housing Infrastructure Fund to deliver constrained previously-developed sites.

LDISSUE: LDMI23

**Comment:**

Roads infrastructure connections between north and south required to be upgraded. The upgrade of A801 (Avon Gorge) has been discussed for some time. This should help to provide a safer road for transport links between West Lothian and Falkirk Council. Upgraded road infrastructure will help provide sustainable transport and hopefully increased footfall within Falkirk Council with those living to the south east feeling more connected.

**Response:**

Comments noted. The upgrading of the A801 (Avon Gorge) is programmed for commencement in 2020/21.

No. of comments: 5

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**Mr Michael Moir**

02822/FLDP\_MIR/3001/001

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LDISSUE: LDMI21

**Comment:**

Suggests that pedestrianisation in town centres may be reducing footfall (e.g. Falkirk and Grangemouth), as compared with other more vibrant centres with through traffic such as Linlithgow and Kelso.

**Response:**

Comment noted.

No. of comments: 1

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**Mr Brian Mooney**

00802/FLDP\_MIR/3001/001

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LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Objects to the potential development of site at Standrigg Road 2, Wallacestone (site 221) for housing. The traffic is bad on this road at peak times. The local school cannot cope - class sizes are too large at present. Healthcare facilities also cannot cope with additional pressures.

**Response:**

Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Local Transport Infrastructure along Standrigg Road is not ideal. Overall accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. Any future proposal would be subject to details assessment in terms of impact on healthcare and education. The site is not identified for housing development in the Proposed Plan.

No. of comments: 1

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**Mr Stuart Moss**

02726/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

Green space is paramount as there is development everywhere. Small villages are merging together and losing their identity and personality.

**Response:**

Comments are noted. LDP2 retains a green belt to prevent further coalescence of settlements and protect their settings.

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LDISsUE: LDMI15

**Comment:**

Quality of life is not measured against what has been built. Development needs to be sympathetic to its surroundings. Bigger is not always better.

**Response:**

Comment noted.

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LDISsUE: LDMI16

**Comment:**

The priority is that the green network remains green and not concrete grey.

**Response:**

Comment noted.

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LDISsUE: LDMI17

**Comment:**

Agree with reducing the rate of growth. Infrastructure needs to be improved before building any more housing.

**Response:**

Comment noted. The Proposed Plan sets out the key infrastructure projects which are needed to address existing deficiencies and support growth in communities. In addition, developer contributions will continue to play an important role in delivering infrastructure which is required to mitigate the impacts of new development.

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LDISsUE: LDMI18

**Comment:**

An adequate amount of stalled sites have been removed

**Response:**

Comment noted.

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LDISsUE: LDMI20

**Comment:**

Agree with the proposed approach to our major employment sites

**Response:**

Comment noted.

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LDISsUE: LDMI21

**Comment:**

All town centres are struggling due to shopping at home. There are no easy fixes.

**Response:**

Comment noted.

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LDISsUE: LDMI22

**Comment:**

Promote the John Muir Way long distance walk more. Increase local paths through green belt areas.

**Response:**

Comment noted. LDP2 identifies John Muir Way as a specific green network priority.

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LDISUE: LDMI23

**Comment:**

Use outdoor greenspace better

**Response:**

Comments noted.

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LDISUE: LDMI24

**Comment:**

Agree with the preferred approach for main issue 10.

**Response:**

Comments noted.

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LDISUE: LDMI25

**Comment:**

Agree with the preferred approach for main issue 11

**Response:**

Supporting comment is noted.

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No. of comments: 11

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**Muirhouses Amenities Association**

00691/FLDP\_MIR/3001/001

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LDISUE: LDI002

**Comment:**

Difficult to balance demand for housing and maintaining a pleasant green belt environment, especially with limited areas for development in the Bo'ness area. Over the years, the Council has promoted a number of projects which have enhanced the general ambience and distinct attractiveness of the area. These have drawn many visitors to tourist attractions such as the Wheel, Kelpies, Antonine Wall & the Scottish Railway Preservation Society in Bo'ness.

**Response:**

Comments noted.

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LDISUE: LDMI17

**Comment:**

Whilst there is pressure for housing to meet the needs of different sectors of the population, there is also a need to prevent creeping urbanisation and the disappearance of smaller communities on the edge of conurbations. This is a difficult balancing act. In Bo'ness there are existing brownfield sites which were once designated for development and are now lying waste such as Bo'ness Foreshore.

**Response:**

The Council is required to provide a generous supply of housing land and housing needs cannot be met exclusively on brownfield sites. Effective brownfield opportunities in Bo'ness are limited. The Bo'ness Foreshore site is not considered likely to be deliverable in the plan period due to constraints, high development costs, low marketability and consequent viability issues. Consequently, it has been de-allocated.

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LDISUE: LDMI19                      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Development of sites at East Muirhouses/Carriden (sites 104 ,105) would be severely detrimental to the amenity and safety of the area. Carriden Brae could not cope with the traffic. Development would lead to loss of agricultural land. There is a lack of facilities such as shops and schools.

**Response:**

The sites at Carriden/Muirhouses have not been identified as a proposal in the Proposed Plan. The sites are not considered to be an appropriate location given significant landscape, ecological, and historic environment impacts, the impact on the character of the village of Muirhouses, and the constrained nature of Carriden Brae as an access to large scale development.

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LDISUE: LDMI23

**Comment:**

Lack of eastward public transport in Bo'ness is a well known issue which should be addressed.

**Response:**

Comment noted. Bus services are commercial operations over which the Council has limited influence.

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No. of comments: 4

**Ms Carey Mulholland**

02865/FLDP\_MIR/3001/001

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LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Ms Mulholland supports the proposal for 5 self-build plots at Irene Terrace, Standburn (site 210). The proposed houses would be ideal starter homes, and there is a shortage of self-build plots in the area. The development would grow the community.

**Response:**

The site is not allocated for development in the Proposed Plan. Development would constitute backland development, and would not be sympathetic to the prevailing settlement pattern. There are also access issues, and the effectiveness of the site is not clear.

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No. of comments: 1

**Ms Gillian Myles**

02899/FLDP\_MIR/3001/001

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LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Objects to the potential development of a site at Standrigg Road, Brightons (site 221) for housing due to environmental factors and already overstretched infrastructure.

**Response:**

The Standrigg Road site (site 221) is not allocated as a housing proposal in the proposed Plan. It would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road.

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No. of comments: 1



LDISUE: LDMI19

**Comment:**

The Larbert North Strategic Growth Area (Kinnaird Village) is not a 'thriving community with its own village centre' as described in the MIR.

**Response:**

Comment noted.

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**Comment:**

Questions the closure of Hamilton Road within Kinnaird Village. Access through Hamilton Road would have minimised traffic passing the primary school and potential danger to children.

**Response:**

The planned closure of Hamilton Road was agreed through the Bellsdyke Masterplan. It offers a safe route for pedestrians and cyclists.

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LDISUE: LDMI20

MIR2/LAR

MIR2 Larbert and Stenhousemuir Sites

**Comment:**

Given the weaknesses in the current facilities within Hill of Kinnaird further house building is not supported at Hill of Kinnaird 2 (site 94) as it would add to school capacity issues and traffic congestion.

**Response:**

The existing business site at Hill of Kinnaird 2 has been amended to include housing/community uses. The housing capacity will be dependent on any residual shortfall from the originally approved 1700 houses for Kinnaird Village.

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No. of comments: 3

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**Network Rail**00493/FLDP\_MIR/3001/001

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LDISUE: LDMI19

**Comment:**

The rail network is a key consideration in determining the document's vision and strategy, and the impacts of new development on the rail network should be considered. Where growth areas are identified, potential impacts should be identified. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure. It would therefore be appropriate to require contributions towards rail infrastructure where they are required as a result of proposed development. LDP2 should identify required additional rail infrastructure which could include signalling, passing loops, car parking, cycling facilities, ticketing outlets and platform extensions. The large preferred housing site at Bo'ness could have an impact on the current operation of Linlithgow Station.

**Response:**

Public transport facilities are one of the areas highlighted in the Proposed Plan where developer contributions could be sought, informed by Transport Assessments and Travel Plans.

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LDISUE: LDMI23

**Comment:**

The Council's aspiration for rail halts at Bonnybridge and Grangemouth is acknowledged. In line with SPP, new stations require a robust appraisal, and agreement with Transport Scotland and Network Rail before proposals are included in the development plan. Greenhill Junction has been identified for further investment in the next 5-10 years and should be identified as an infrastructure proposal. Network Rail should be excluded from any developer contribution requirement because they are a public sector organisation.

**Response:**

Text has been inserted to accompany the rail station safeguarding to clarify the level of appraisal and evidence which would be required to progress these projects. The Proposed Plan has identified the Greenhill Junction improvement as a proposal.

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No. of comments: 2

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**NHS Forth Valley (NHS Board)**

00522/FLDP\_MIR/3001/002

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LDISUE: LDMI17

**Comment:**

A more generous housing flexibility target of 20% should be introduced. The current target is pessimistic and will not realise the full potential of the housing market in the Falkirk area.

**Response:**

The flexibility allowance is 14% in the Proposed Plan. This is within the range of 10-20% specified in SPP, and is considered an appropriate level for the area.

**Comment:**

Support for the view that there needs to be a focus on sites where there is clear market interest, such as Larbert. There is no point continuing to allocate sites which have failed to deliver housing.

**Response:**

The plan seeks to distribute new homes across the Council area, and not concentrate solely on areas which are favoured by the market, so most communities can benefit from new growth. The allocated sites, both existing and new, offer sufficient scale and flexibility of supply to meet the housing targets, and are in marketable locations.

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LDISUE: LDMI19

MIR2/LAR

MIR2 Larbert and Stenhousemuir Sites

**Comment:**

Seeks the allocation of Glenbervie South (Site 219) for residential development. The site is presently used for grazing and is considered suitable for residential development in the medium to longer term.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. The site would represent a substantial westward extension to Larbert, with a range of potential environmental impacts. It is cut off from the main urban area of Larbert and there is insufficient capacity at Larbert High School to accommodate the development.

LDISSUE: LDMI23

**Comment:**

High School capacity cannot be a constraint on the development of much needed housing. There are mechanisms which have been adopted elsewhere to ensure the delivery of housing and associated secondary school provision.

**Response:**

The Proposed Plan contains proposals for the delivery of education capacity enhancements in growth areas where appropriate. However, in some instances there may be no satisfactory or deliverable solutions to school capacity issues, and growth opportunities will therefore be constrained.

No. of comments: 4

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**A Nimmo**

00094/FLDP\_MIR/3001/001

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LDISSUE: LDMI19      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Objects to the proposed allocation of land at Crawfield Road, Bo'ness (site 102) for housing. It would destroy an area of green belt and prime farmland; adversely impact on visual and other amenities of local residents; generate considerable traffic to the detriment of road safety and encourage parking in congested housing estates; exacerbate flooding on Crawfield Road; endanger an SSSI; and impact on local infrastructure including schools, medical and police.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

No. of comments: 1

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**Dr Paul Norris**

00841/FLDP\_MIR/3001/001

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LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Mr Norris supports the view that additional residential development in the Wallacestone/Maddiston area should be restricted to the very specific use of developing new retirement housing and a care home (site 142). The proposed housing sites at Standrigg road and Greenwell Farm (138,139 and 147) are considered inappropriate for residential development. This reflects concerns about the capacity of the local road infrastructure, school capacity at Wallacestone and Maddiston Primary Schools, and the potential loss of greenfield sites which would have significant landscape, visual and wellbeing impacts.

**Response:**

Support noted.

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**Comment:**

Dr Norris does not support Standrigg Road 2 (site 221). The points which make sites 147, 138 and 139 unsuitable for development equally apply to any proposed development further down Standrigg Road. The site assessment for Standrigg Road 2 (site 147) implies access will be on to Standrigg Road. This road is a relatively minor road which already suffers congestion at peak times, notably around Westquarter Cricket Club. Much of Standrigg Road lacks pavements and visibility along the road is poor. There will be a cumulative impact along the B805 should development of site 138 or 139 take place. Wallacestone Primary School which would serve site 147, and is suggested as a possible option for the education needs of sites 138 and 139, is one of the largest primary schools in the Falkirk area and is limited in terms of scope for further expansion. The capacity of other public services, notably healthcare, again, should be considered. Standrigg Road provides a natural boundary to the south side of existing housing development in the local area. Further development on the other side of Standrigg Road will have a visual, and ecological impact. Local Development Plan 1, suggested that development around the Braes area should take the form of infill development (for instance, the smaller field area already surrounded by housing on the opposite side of Standrigg Road from Westquarter Cricket Club). This approach should be followed in LDP2, given the wider environmental and sustainability objectives outlined in the Main Issue Report.

**Response:**

Standrigg Road sites (Site 221 and 147) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Both sites have landscape impacts although these could potentially be managed. The local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. The sites are therefore not identified for housing development in the Proposed Plan.

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No. of comments: 2

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Ogilvie Homes Ltd

00614/FLDP\_MIR/3005/002

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LDISSUE: LDI002

**Comment:**

No recognition of the role of the Council in ensuring that the LDP will assist the house building industry in delivering the true scale of housing required to meet demand within the Council area. Suitable investment in local infrastructure must be made in strong market areas to support future development. The use of developer contributions can assist the provision of new infrastructure and limit impact on the viability or timing of new development.

**Response:**

The Proposed Plan contains sufficient housing to deliver the area's housing needs as assessed by the HNDA. The plan identifies a range of key infrastructure projects which are needed to address any existing deficiencies and support future growth in LDP2. Policy IR02 on developer contributions sets out policy guidance for infrastructure required specifically to mitigate the impacts of new development.

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LDISSUE: LDMI15

**Comment:**

Policy and Guidance - consolidation of existing design policies into one place making policy based around the 6 qualities of successful place is supported as with will help to align policy with national requirements.

**Response:**

Comments are noted and welcomed.

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**Comment:**

Communities and Place - A combined approach of preparing Place Statements with follow up briefs and masterplans would be a suitable approach in the long term planning of a particular settlement.

**Response:**

Comments are noted. The idea of an SG on Place Statements is not being taken forward due to possible overlap with local place plans, and potential for creating too many similar types of documents.

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**Comment:**

Support for retaining existing design policies which remains fit for purpose. The current approach allows applicants and developers to focus on specific issues which are relevant to their proposals, this may be diminished if a single policy is adopted.

**Response:**

The Proposed Plan consolidates the design policies into the overarching Policy PE01 Placemaking. This is considered the best approach which allows developers to readily access the relevant policy guidance.

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**Comment:**

Place Statements should be included in the plan rather than supplementary guidance, otherwise they will not be given the same independent assessment through the examination process. Landowners and developers should also be involved in producing them. If place statements are not prepared as an integral part of the plan, the current approach should be maintained.

**Response:**

Comment noted. Place Statements are not being taken forward due to concerns about potential overlap and confusion with local place plans which are being proposed through the Planning Bill, and other community planning processes.

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LDISSUE: [LDMI16](#)

**Comment:**

Green Infrastructure and New Development - The proposed approach to consolidating existing green infrastructure within a single document is welcomed.

**Response:**

Comments are noted and welcomed.

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**Comment:**

Open Space - the Council's proposal to update existing open space policy following the review of its Open Space Strategy is welcomed but any changes to policy should be consulted on during the preparation of relevant supplementary guidance and during a general review of developer contributions.

**Response:**

Comment noted. The Council is keen to engage the housebuilding industry on future revisions to supplementary guidance documents, including those which set out developer contributions.

**Comment:**

A more generous level of flexibility (20%) should be adopted, increasing the housing land requirement by 240 homes. A more flexible approach to delivering the affordable housing need would be welcomed provided that the new thresholds were underpinned by strong evidence of need (especially if these are being raised).

**Response:**

The Proposed Plan has added a 14% generosity allowance to the housing supply target. The 14% generosity allowance is within the margin required by Scottish Planning Policy (10 to 20%) to be added to the housing supply target to establish the housing land requirement. The housing land requirement already includes a housing supply target for affordable homes. This target is based on findings on the Housing Needs and Demand Assessment, which achieved 'robust and credible status' from the Scottish Government's Centre for Housing Market Analysis.

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**Comment:**

It is not justifiable for the Council to make a significant decrease in the housing land supply target. The reduced target will lead to a contraction of the delivery of much needed housing. The flexibility allowance should be increased from 15% to 20%. This increase is needed given the uncertainty over timescales for the delivery of some of the larger development sites within the land supply.

**Response:**

The reduction in the housing land target reflects the HNDA, which takes into account projected reductions in the rate of household growth in the area. The HNDA target is 418 units per year, and the Proposed Plan has set the housing supply target at 450 units. The flexibility allowance has been set at 14% which is considered appropriate and within the range required by SPP.

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**Comment:**

Given the tight geographical nature of the Council area there is no justification for the two tier quota system for affordable housing. A single quota requirement of 15% should be applied to all qualifying developments.

**Response:**

The Council continues to adopt a two tier approach to applying its affordable housing requirement. The requirements are set at 15% in lower level areas of need, and 25% in more pressured areas. This reflects real differences in need between the various sub market areas.

**Comment:**

Windfall allowance of 500 units over 10 years should be replaced by specific land use allocations over the same period.

**Response:**

A windfall allowance is permitted by SPP, and reflects the relatively high levels of windfall sites which have historically come forward in the area. The figure of 50 units per year has been justified by an analysis of past trends.

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**Comment:**

Support for an 'alternative sites' policy which is necessary to ensure that a minimum five year effective supply of housing land is maintained.

**Response:**

Support noted.

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LDISSUE: LDMI18

**Comment:**

The effectiveness of major housing led regeneration areas at Whitecross, Bo'ness and Banknock appears to be in question due to ownership, marketability and financial constraints. These sites should be de-allocated and removed from the housing land supply allowing the housing numbers to be re-allocated to more suitable locations.

**Response:**

The effectiveness of the existing housing land supply has been robustly assessed. The Bo'ness foreshore site has been de-allocated, and Whitecross has been scaled down to a more deliverable level. The Banknock site has planning permission, and is considered effective in the plan period. Funding has been secured to deliver an upgrade to the M80 J7 slip which will help facilitate its development.

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**Comment:**

Support for the de-allocation of stalled sites in preferred option, on the basis that additional land is brought forward to replace these sites. Also those sites in alternative option should be de-allocated and replaced by new allocations. Effectiveness of Bo'ness Foreshore and Whitecross questioned.

**Response:**

Support noted. Bo'ness Foreshore has also been de-allocated in the Proposed Plan, and Whitecross has been significantly reduced in scale to aid deliverability.

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LDISSUE: LDMI19                      MIR2/DEN      MIR2 Denny and Dunipace Sites

**Comment:**

The Council's intention to continue the allocation of Rosebank (site 017) is welcomed. Site investigation and technical work is being carried out with a view to submitting a planning application in the coming months. This site is effective and can deliver housing in the short term.

**Response:**

Comment noted.

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**Comment:**

Rosebank North (site 0116) is promoted as a logical extension to the allocated housing site at Rosebank (site 017) for an additional 50-75 units. The two sites together do not represent a significant expansion of the settlement and cannot be termed as strategic in scale. Overall loss of prime quality agricultural land will not be a significant increase of the existing planned loss at Rosebank. Other minor impacts on the environment can be minimised with appropriate mitigation. Transportation and other infrastructure issues raised by the Council are not insurmountable. The need for any contribution towards the DEAR is questioned as most site traffic would travel north. The cost of financial contributions towards off site infrastructure improvement are unlikely to be an impediment to developing this land provided that they are related in scale and kind to the development.

**Response:**

The site is not allocated as a housing proposal in the Proposed Plan. It would constitute a further major extension to the Denny/Dunipace urban area which already has a very high level of committed growth. The gas pipeline and impacts on the local road network, are significant constraints.

**Comment:**

Bankend Farm (site 0164) is promoted as a potential long term residential development opportunity rather than a specific housing allocation. Ogilvie Homes wish to discuss the potential impacts arising from the development of the site with the Council at an appropriate time in conjunction with the preparation of a Place Statement for Denny and Dunipace as part of a long term settlement planning approach.

**Response:**

The site is not identified as a housing proposal in the Proposed Plan. It would constitute a further major extension to the Denny/Dunipace urban area which already has a very high level of committed growth. The site's development would likely have a number of negative impacts on the environment. Local road network impacts are a major factor constraining the effectiveness of the site, notably congestion at Denny Cross.

**Comment:**

Seeks allocation of two housing sites in Airth, Eastfield 1 (site 150) and Eastfield 2 (site 151). Eastfield 1 covers 1.9ha and has an indicative capacity of 50 units. Eastfield 2 covers 19.5ha and has an indicative capacity of 200-250 units. Both sites are considered to be immediately effective and are within a single ownership.

**Response:**

The sites have not been identified as proposals in the Proposed Plan. Given existing allocations in Airth, further significant expansion of the village is not favoured. There are also significant flooding and education issues associated with both sites.

LDISSUE: [LDMI23](#)

**Comment:**

Agree that a requirement should be placed on developers for financial contributions to mitigate the impact of development on local communities in accordance with Circular 3/2012. There should be no move towards the introduction of an infrastructure levy until the implications of the review of the planning system on the delivery of infrastructure are known and any new policy requirements become established as new national policy.

**Response:**

Comments are noted. The Proposed Plan incorporates Policy IR02, which sets out the circumstances in which developer contributions will be sought in the Council area. The policy reflects the principles of Circular 3/2012. The infrastructure levy is currently being considered through the new Planning Bill.

No. of comments: 19

Ms Ellen O'Neill

02881/FLDP\_MIR/3001/001

LDISSUE: [LDMI19](#)      [MIR2/BNS](#)      [MIR2 Bo'ness Sites](#)

**Comment:**

Objects to the allocation of land for housing at Crawfield Road, Bo'ness (site 102). Site is green belt and its development will be detrimental to wildlife habitats and woodland. Destroying the fields around the wildlife reserve will have an adverse impact on flora and fauna. The natural beauty of the area will be destroyed and the character and amenity of established areas damaged. It is used for walking by locals and tourists, and is part of the John Muir Way. Bus services to Bo'ness have been cut, and the development will generate car traffic with adverse effects on pollution, parking and congestion in Linlithgow.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

No. of comments: 1



LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Objects to potential development of a site at Standrigg Road, Wallacestone (site 221) for housing. Issues include road safety given constraints on the local road network, school capacity constraints, additional pressure on amenities such as doctor and dentist services, and poor drainage on the land in question.

**Response:**

Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. The site is therefore not identified for housing development in the Proposed Plan.

No. of comments: 1

Paradigm Asset Management Group Ltd

02876/FLDP\_MIR/3001/002

LDISSUE: LDMI17

**Comment:**

Flexibility allowance should be increased to 20%. This added flexibility will cover uncertainty in the delivery timescales for sites and allow the housing supply target to be met even if there are delays in some sites. There has been a history of under delivery in Falkirk.

**Response:**

The flexibility allowance is 14% in the Proposed Plan. This is within the range of 10-20% specified in SPP and is considered to be an appropriate level for the area.

LDISSUE: LDMI18

**Comment:**

Support for the strategy of removing stalled sites if there is no prospect of them being developed. Further scrutiny of a number of other sites and their prospects for delivery needed. Falkirk's HLA is relying on aged sites which have been identified for housing development for a number of years without coming forward.

**Response:**

Comments noted. A further review of the effectiveness of sites has been carried out and a range of sites have been de-allocated in the Proposed Plan, generally as proposed in the MIR but with the addition of Bo'ness Foreshore. Some sites have been left in the Proposed Plan, but do not make a contribution to the housing land supply.

LDISSUE: LDMI19

**Comment:**

Given the popularity and strong housing market in Larbert there is a need for additional sites to be allocated, and particularly those which will not reduce business land or compromise the green belt.

**Response:**

The preferred approach is not to promote any further significant housing growth in Larbert and Stenhousemuir. Capacity issues at Larbert High School remain a significant constraint to the allocation of further housing land.

**Comment:**

Seeks allocation of a 13 acre agricultural site at Glenbervie West (site 218) for 63 housing units approx. The site will help tackle the shortfall in housing delivery that has developed.

**Response:**

The site has not been included as a housing proposal in the Proposed Plan. It is detached from the main urban area and does not relate well to the existing settlement, due to severance caused by the A9. Its location and backland nature mean that vehicular access is potentially difficult. Capacity issues at Larbert HS remain a considerable constraint.

No. of comments: 4

**Tony Pargeter**

00826/FLDP\_MIR/3001/001

LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

I want to ensure that the fields to the south of Standrigg Road (Site 147) are not identified for development. Road access is already difficult and there is an accident waiting to happen at the corner near the cricket club / nursery due to parked cars. Wallacestone school is already at capacity and cannot be developed. Local amenities such as doctors are also oversubscribed.

**Response:**

The Proposed Plan does not identify the site as a housing proposal.

No. of comments: 1

**Paths For All Partnership**

00359/FLDP\_MIR/3001/001

LDISSUE: LDI002

**Comment:**

30% of the population of Falkirk and Grangemouth travel less than 5km to work. These towns are particularly well placed to increase the level of people who travel to work by active travel. The vision should align with the National Walking Strategy by aiming to: create a culture of walking; create better walking environments; and ensure easy, convenient independent mobility for all.

**Response:**

Comment noted. The LDP2 facilitates and supports active forms of travel. For example, Policy PE01 requires development to be designed to encourage the use of active travel and sustainable integrated transport. Furthermore, accessibility was a key consideration in determining sustainable land allocations.

LDISSUE: LDMI15

**Comment:**

Using the place standard as a tool for placemaking is supported. Active Travel is a key tool which can help to deliver the six qualities of successful places highlighted in SPP and it should be given greater prominence within the LDP.

**Response:**

Policy PE01 is a new policy specifically setting out how new development proposals should promote the Scottish Government's six qualities of successful place as defined in Scottish Planning Policy. Policy PE01 has requirements for 'safe and pleasant', 'easy to move around and beyond' and 'welcoming' which will help facilitate well-connected development proposals. This overarching design policy is supplemented by other plan policies and supplementary guidance, including SG02 'Neighbourhood Design'.

LDISSUE: LDMI16

**Comment:**

We welcome the recognition of the role that CSGN has in promoting active travel and healthier lifestyles. With Falkirk a key part of the CSGN this opportunity could be grasped with active travel routes linking CSGN, canals, main population areas and Falkirk's Greenspace. Combining these factors affords Falkirk the opportunity to be one of Scotland's premier areas for living an active, green lifestyle. This will increase Falkirk's desirability as a place to live as well as attracting new businesses.

**Response:**

Comments are noted and welcomed.

LDISSUE: LDMI17

**Comment:**

Affordable housing should be seen in the context of affordable living. If houses are built so far from employment, social and leisure opportunities that they require cars to access these critical facilities, or there is no readily accessible public transport available, then the cost of travel negates the benefits of providing affordable housing. We would urge consideration of the ability to access work and play by active travel means as a key consideration in the location of any housing, but it is a critical component of affordable housing.

**Response:**

Comment noted. LDP2 identifies the most appropriate land allocations after consideration of many factors, including proximity to public transport, amenities and the path network.

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LDISSUE: LDMI19

**Comment:**

We support 4.18 and the inclusion of SPP factors including accessibility of sites, especially by sustainable means of transport when considering location of new homes. Infrastructure that allows for walking and cycling to access bus and rail opportunities needs to be considered very early in the planning process.

**Response:**

Comments are noted and welcomed.

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LDISSUE: LDMI21

**Comment:**

The provision of infrastructure that prioritises walking and cycling is an ideal way to promote active, accessible and attractive town centres. There is ample evidence from Scotland and the rest of the world that enhancing the public realm for people rather than cars is fundamentally important for the future of towns. Therefore, the actions in 5.32 that prioritise investment in pedestrian and cycle movement, linking to Grahamston rail station, the retail park and key visitor destinations are to be welcomed. Figure 5.5 also identifies the opportunities to link the town centre core to the canal network. If this was achieved by active travel means it would add excellent value to the area.

**Response:**

Comments are noted and welcomed.

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LDISSUE: LDMI22

**Comment:**

Building and promoting an active travel infrastructure that connected Town Centres, the canal network, CSGN, Antonine Wall, the Kelpies and other key visitor destinations would add value to a growing tourist market that looks to walk and cycle around Scotland, either for day visitors or those that stay longer. This infrastructure can be created at relatively little expense, yet builds significant capacity and interest into existing tourist attractions. This in turn leads to greater economic activity.

**Response:**

Comments noted. LDP2, pg. 16, Table 3.1 lists key green network priorities for specific components of the green network. This includes the John Muir Way and Helix among many other locations.

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LDISSUE: LDMI23

**Comment:**

Whilst there may be some short-term needs to invest in roads, this investment may not be necessary in the future, so we would urge caution on further investment as identified in 6.03. Similarly, in 6.05, whilst there has been an increase in car parking at rail stations, there is a compelling case to be made for enhanced cycle provision and better walking infrastructure to ensure people can get to rail stations using active transport. We would support further improvements to the Bus station to make bus travel an attractive option and encourage the creation and expansion of bus routes to meet future demands. We are delighted to read in 6.06 that additions to the active travel network have been prioritised for future investment, and would suggest that the A904 corridor improvements must incorporate cycle/pedestrian facilities.

**Response:**

Comments are noted and welcomed.

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LDISSUE: LDMI24

**Comment:**

Transport is the second biggest contributor to Scotland’s greenhouse gas emissions, yet there is no mention of it in this section. The Local Development Plan, and how it locates people, houses and jobs has a significant impact on how goods and people travel in an area. This has a consequential knock-on effect on carbon emissions. Prioritising active travel and public transport is a key to reducing this consumption. It should be identified as a Main Issue in this report.

**Response:**

Comment noted. LDP2 has planning policies promoting active travel. Policy PE01, for example, requires development to be designed to promote the use of active travel. Furthermore, LDP2 identifies the most appropriate land allocations after consideration of many factors, including proximity to public transport, amenities and the path network. Indeed, some sites are not supported due to their remoteness.

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LDISUE: LDI002

**Comment:**

The Council's vision requires to be far more ambitious in delivering their objectives in association with the development industry. Given the rising completion rates across the Council area there is a need to allocate sufficient effective and deliverable housing sites which have the ability to contribute within the LDP period.

**Response:**

The vision is ambitious, setting long term goals to improve the quality and vitality of existing communities through further growth, investment, jobs and sustainable use of assets and resources. Furthermore, the Proposed Plan has allocated enough housing land in the right places with flexibility to deliver the plan's vision, and objectives for continued population and household growth.

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**Comment:**

Vision is supported, in particular growth aspirations and the objectives with regard to thriving communities. However, given the stalling of sites, deliverable housing allocations must be made to achieve the required population growth.

**Response:**

Support welcomed. The Proposed Plan has allocated sufficient land to deliver the required level of growth.

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**Comment:**

The Council should be more ambitious in delivering the objectives of the vision in co-operation with the development industry. House building should be increased in stronger market areas (including Polmont and the Braes) and local infrastructure constraints should be addressed to facilitate this.

**Response:**

The Council has a positive vision for sustainable growth in the area. The Proposed Plan will enable continued population and household growth and the delivery of new homes to meet the full range of housing needs, based on the HNDA and other relevant considerations set out in SPP. Growth is distributed around the Council area, taking account of environmental and infrastructure capacity issues. The Council is also working actively with partners to deliver the infrastructure needed to support growth.

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LDISUE: LDMI15

**Comment:**

We have no objection to creating settlement place statements as this would demonstrate the landscape and townscape benefits of development at Standrigg Road.

**Response:**

The Proposed Plan does not take forward the idea of place statements on the basis that these may overlap with the emerging local place plans proposed in the Planning Bill, causing duplication and potential confusion.

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LDISUE: LDMI16

**Comment:**

The site at Standrigg Road can contribute towards improving the key green network corridor in the Braes and has the potential to deliver new outdoor learning and community growing sites as well as better integrating the Burnside Community Woodland into the network and enhancing the Gardrum Burn SINC. We support the intention to prepare supplementary guidance on incorporating green infrastructure into new development.

**Response:**

Comments noted. The site is not identified for housing development in the Proposed Plan. The site would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road.

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LDISSUE: LDMI17

**Comment:**

An annual target of 480 units per annum is not a sustainable target and there is no justification for the proposed reduction in supply. Notwithstanding the average completion rates between 2008-2015, the significant growth in completion rates since 2012/13 suggests that a target of 480 units per annum is unduly pessimistic. There is no justification as to why the 17% flexibility applied in LDP1 has been reduced. The level of flexibility should be a minimum of 20%.

**Response:**

The Housing Need and Demand Assessment (HNDA) identifies a housing need at 418 homes per year. The Council has increased this to a housing target of 450 homes per year over the period 2020-2030. While this is a reduction from LDP1, the target is higher than the HNDA estimate and more closely reflects current population trends: lower household growth projections and a general slowdown in household formation. The Proposed Plan has applied a 14% generosity allowance to the housing supply target. This level is within the margin of generosity (10 to 20%) that SPP requires to be added to ensure a generous supply of land.

**Comment:**

Housing target should be significantly greater. The application of a lower flexibility allowance of 15% compared with 17% in LDP1 is not fully justified. This should be increased to 20% given that the deliverability of some sites is questionable. LDP2 needs to address backlog shortfall from LDP1 of 550 units which should be carried forward.

**Response:**

The housing supply target has been set at 450 houses per annum in the Proposed Plan. This reflects the HNDA and the reduction in the projected rate of household growth. The level of flexibility has been set at 14%.

**Comment:**

We do not accept that reducing the housing target from 675 to 480 houses a year is sustainable and see no justification for this scale of reduction in supply. We also question the split between market and affordable housing. Achievement of the target will require a significant reliance on private housing sites to meet affordable housing need. Instead we suggest that the Council should adopt an annual housing target of 591 houses a year and apply a 20% flexibility allowance which would create a requirement to identify land for 7092 homes deliverable between 2020-2030. This will give encouragement to the house building sector in the confidence that there is a generous supply of land which will assist in raising completion rates.

**Response:**

The HNDA identified housing need at 418 units/yr and we have increased this to a housing supply target of 450 units/yr as part of the Proposed Plan. The HNDA which the Proposed Plan is based on is dated May 2016 and was declared "robust and credible" by the CHMA (Centre for Housing Market Analysis). The Proposed Plan has added a 14% generosity allowance to the housing supply target. 14% is within the margin required by Scottish Planning Policy (10 to 20%) to be added to the target to establish the housing land requirement.

LDISSUE: LDMI18

**Comment:**

It is very unclear as to why the MIR does not propose de-allocation of a number of other stalled sites on the basis of non-effectiveness. The Council's preferred option is not supported as it places an over-reliance on existing sites which remain of questionable viability/effectiveness. A number of additional sites at Portdownie, Whitecross and Bo'ness Foreshore should be de-allocated.

**Response:**

The Council has appraised the effectiveness of the housing land supply through the Housing Land Audit and the LDP2 process, and has de-allocated sites where appropriate. Of the sites mentioned, Bo'ness Foreshore has been de-allocated, and although Portdownie remains allocated as a desirable future regeneration project, it makes no contribution to the housing land supply. Whitecross has been scaled down to more realistic and deliverable level.

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**Comment:**

The MIR does not provide any detail on the reprogramming of stalled sites. It is questioned whether such sites should still be included in the housing land supply.

**Response:**

Reprogramming has been factored into the calculation of the output of sites during the initial 10 year period of the plan. This will continue to be monitored through successive HLAs.

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**Comment:**

It is not clear why sites at Bo'ness, Whitecross and Portdownie have not been de-allocated on the basis of non-effectiveness, viability or delivery. We don't agree with the preferred option as non-deliverable sites have been retained within the land supply.

**Response:**

The Council has appraised the effectiveness of the housing land supply through the Housing Land Audit and the LDP2 process, and has de-allocated sites where appropriate. Of the sites mentioned, Bo'ness Foreshore has been de-allocated, and although Portdownie remains allocated as a desirable future regeneration project, it makes no contribution to the housing land supply. Whitecross has been scaled down to more realistic and deliverable level.

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LDISSUE: LDMI19

**Comment:**

A number of sites within the existing housing supply for Bonnybridge and Banknock (particularly at Dennyloanhead and Banknock South) are stalled sites which have significant concerns regarding their effectiveness. The Council's preferred option for sustainable community growth in Bonnybridge and Banknock is therefore not supported and alternative housing sites should be found.

**Response:**

The Council has appraised the effectiveness of the housing land supply through the Housing Land Audit and the LDP2 process. The sites at Dennyloanhead and Banknock are considered effective in the plan period. Banknock North and Dennyloanhead both have planning permission, and the Council is actively engaged in developing a scheme for Council new build at Banknock South. Funding has been secured to upgrade the M80 J7 sliproads which will facilitate all these developments.

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**Comment:**

The preferred option for Falkirk is not supported. The allocation of housing at the Falkirk Gateway may be short sighted as there could be a requirement for retail here in the future. Land at Glen Farm should be allocated. The preferred option for Bo'ness is also not supported because the scale of allocations is too great, and there is an over reliance on Bo'ness sites in terms of the overall strategy.

**Response:**

The preferred option for Falkirk in the MIR has been carried through into the Proposed Plan, and is considered appropriate. The Glen Farm site is not considered a suitable or sustainable way of expanding the town. The inclusion of an element of residential use at the Falkirk Gateway will not compromise its economic potential given the scale of the site, and the relatively modest level of housing allocated. There is not considered to be an over reliance on Bo'ness sites which comprise only about 10% of the total allocations in the plan.

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**Comment:**

Objects to the preferred option for the Braes and Rural South area which is for no further housing development beyond currently allocated sites. Existing level of supply in Bo'ness is adequate. The amount of new housing allocated in this area is disproportionate. The existing level of supply in Bonnybridge, Banknock, Denny and Dunipace is significant but focus on existing Strategic Growth Areas which is considered to be appropriate. There is considerable housing demand from employment in Grangemouth which cannot be met locally. Focus on the North Larbert SGA in Larbert and Stenhousemuir is considered appropriate. There is no evidence to suggest that windfall development can deliver 50 units per annum over the plan period. The windfall target prejudices the consideration of open space sites which are being promoted for development. Windfall sites should provide added flexibility to the land supply rather than being a key component of it.

**Response:**

The Proposed Plan contains a substantial volume of existing commitments in Braes and Rural South carried forward from LDP1, notably the Maddiston East Strategic Growth Area, which has been further extended, and the revised Whitecross Strategic Growth Area. Allocations in Bo'ness amount to only 10% of the total allocations, which is not disproportionate. The windfall estimate is backed up by a robust evidence base of past trends, and future prospects.

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**Comment:**

A new Strategic Growth Area should be established at High Bonnybridge incorporating Reilly Road (site 113) for 300 units. The site is a sustainable and deliverable residential development opportunity. It is under the control of a national housebuilder who seeks to bring the site forward within the LDP period and does not suffer from any insurmountable development constraints which would preclude its future development for residential purposes.

**Response:**

The site is not identified as a housing proposal in the Proposed Plan. The site lies partly within the Antonine Wall Buffer Zone and has the potential to adversely impact on the Outstanding Universal Value of the World Heritage Site. Road network and education capacity issues may also constrain the effectiveness of the site.

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**Comment:**

The allocation of 450 units at Crawfield Road (site 102) places an over reliance on a single location for housing provision. Bo'ness is one of the least sustainable settlements within the Falkirk Housing Market Area and we question whether the loss of greenbelt in this location would outweigh looking at infrastructure improvements in more sustainable settlements. The Council should instead focus its attention on the delivery of the existing Bo'ness South East SGA.

**Response:**

Crawfield Road (site 102) is no longer proposed for housing. Housing allocations are spread throughout the Council area, and there is not an over reliance on any one location.

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**Comment:**

The site at Crawfield Road is greenbelt and prime quality agricultural land and therefore its allocation is contrary to the provisions of SPP.

**Response:**

The Crawfield Road site (site 102) is no longer proposed for housing within LDP2. Despite this, the Proposed Plan has enough housing sites with flexibility to meet the housing land requirement in full over the plan period and to satisfy Scottish Planning Policy requirements.



**Comment:**

Drum Farm South is a business site. Promoting the site for mixed use development is contrary to the Economic Development Strategy and exacerbates a disconnection between housing and employment markets.

**Response:**

The site is carried forward as an allocation for mixed use development in the Proposed Plan with additional housing. This is justified on the basis that there has been no demand for business on the site over many years, there is a general oversupply of employment land in the area, and the site is not particularly well located in comparison with other strategic sites.

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**Comment:**

The site at Standrigg Road (Site 147) should be allocated for housing development as: it is fully aligned with the LDP Vision, its associated objectives and its key themes; it is compliant with the SEA and scores higher than allocated sites; it would contribute to the maintenance of a land supply over the plan period and help to meet a deficiency in the 5 year land supply; it could provide a range of environmental socio-economic benefits to the local area; and it is superior in quality to many of the other allocations in the MIR.

**Response:**

The Standrigg Road 1 site ( 147) does not represent a logical extension to the urban area, and has low overall accessibility. There would be potentially significant landscape impacts, due to its topography. Cumulative impacts on the local road network, and other infrastructure were a key consideration in terms of the growth strategy for the Braes in LDP2, with the main area of growth continuing to be focused on Maddiston East.

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**Comment:**

Supports the continued allocation of Hillcrest (site 056). However, the capacity should be increased to approx 100 units to reflect the limited constraints of the site. The site has been subject to analysis (LVIA, ecological assessments, tree survey, transport assessment and masterplan) under application P/16/0706/FUL which demonstrate that the site can accommodate a significantly larger number of units. The Shieldhill settlement boundary should also be extended to include the site, given that development would result in an extension to Shieldhill settlement.

**Response:**

On the basis of the existing consent for 90 units, it is considered appropriate to identify the site for 91 units in the Proposed Plan, based on an amended site boundary excluding the eastern part of the site, outwith the application boundary. However, it is not considered appropriate to bring the site within the Shieldhill settlement limit, as this development was intended as a consolidation of the existing Hillcrest development rather than an extension to Shieldhill. The landscape buffer between the site and the settlement edge will be important in terms of integrating the site into the landscape.

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**Comment:**

Promotes a site at Glen Farm, Falkirk (site 121) for 150 units. This would represent a logical extension to south Falkirk, which is effective in terms of PAN 2/2010 criteria, with no known constraints which would hinder development within the LDP period. Issues raised in the Council's site assessment are discussed with reference to supporting reports on ecology, flood risk and transport/access. Landscape and visual impacts are not dissimilar from other preferred sites, i.e. impacts can be mitigated to some degree.

**Response:**

The site at Glen Farm, Falkirk has not been identified as a proposal in the Proposed Plan. The site is not considered a suitable location for expansion of Falkirk due to a poor fit with the existing urban area, potential landscape and ecological impacts, and its generally low accessibility.

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**Comment:**

Falkirk Gateway is a business site. Promoting the site for mixed use development is contrary to the Economic Development Strategy and exacerbates a disconnection between housing and employment markets.

**Response:**

The Falkirk Gateway site remains a key economic development opportunity at the eastern edge of Falkirk, and is allocated for mixed use in the Proposed Plan. The element of housing is small (100 units) in relation to the overall scale of the site, and will not prejudice the economic aspirations for the site.

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**Comment:**

Housing allocations at Woodend Farm are on prime quality agricultural land in the countryside adjacent to the green belt and will have a significant landscape impact.

**Response:**

The site at Woodend Farm is identified in the Proposed Plan for housing development. This constitutes a logical extension to Hallglen village. Landscape impacts can be mitigated, and the proposal will result in the retoration of the farm steading, and the delivery of substantial Council new build to meet affordable housing need in the area.

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**Comment:**

The site at Firs Park is already consented and is unlikely to make any contribution post 2020.

**Response:**

The site has had planning permission, is well located in central Falkirk and there is no reason to believe that it is not developable in the period of the plan.

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**Comment:**

Hill of Kinnaird 2 is a business site. Promoting the site for mixed use development is contrary to the Economic Development Strategy and exacerbates a disconnection between housing and employment markets.

**Response:**

The Proposed Plan allocates 70 new housing units on this site as part of a mixed use development representing the under build from the 1700 units originally consented under the Bellsdyke/Hill of Kinnaird Masterplan. This is not considered likely to have a significant impact on the employment land supply in the area, given the range and extent of other business sites which are generally better located.

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**Comment:**

Flood risk and access may be problems on the site at Newton Park South, Skinflats (site 203).

**Response:**

It is accepted that there are potential flood risk issues affecting Skinflats. Accordingly the site has not been included in the Proposed Plan as a housing proposal.

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LDISSUE: LDMI20

**Comment:**

A thriving housing market relies on sustainable levels of business activity within good marketable locations. Permitting residential use in key strategic employment sites rather than in other, older, less-attractive employment areas where residential development would be beneficial is misguided.

**Response:**

The future vision for employment sites in the area has been reviewed in LDP2, in the context of the generous business land supply, and limited level of take up. The introduction of limited housing on the Falkirk Gateway and Hill of Kinnaird business sites is considered justified, will aid the delivery of quality development on these sites, and will not prejudice the overall quality and diversity of the business land supply.

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LDISSUE: LDMI23

**Comment:**

The proposed approach of assessing developer contributions on a site by site basis is supported. The Council should consider that front funding (and recouping contributions over time from sites) may be necessary to allow the delivery of housing sites within the required time.

**Response:**

Comment noted. Front funding and recouping contributions from developers over time involves considerable risk for the Council. Nonetheless, the Council is taking proactive steps to deal with infrastructure issues where possible. As well infrastructure funding through TIF, it has recently decided to meet the funding gap to enable the Denny Eastern Access Road to be built, and has secured Government funding to deliver the M80 Junction 7 slip road improvements.

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**Comment:**

There is relatively little infrastructure investment planned or required in the Braes area.

**Response:**

There has been substantial housing growth within the Braes over the last 30 years, and commensurate investment by the Council in the school estate to deal with this growth. Further investment is identified at Braes HS and Graeme HS in the Proposed Plan to deal with long term capacity pressures. Improvements to the strategic road network serving the area are included in the plan (M9 junctions and A801 upgrade) and will be partly funded through TIF. However, the local road network in parts of the Braes is constrained, with no obvious solution, and this is a key reason why further significant allocations in these areas have not been made.

No. of comments: 29

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**Philip C Smith Commercials**

00145/FLDP\_MIR/3002/002

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LDISSUE: LDMI15

**Comment:**

Policy and guidance - Any design guidance should provide clarity to minimise the subjective criteria (within figure 3.1 of the MIR) to provide confidence to designers and developers when putting together proposals.

**Response:**

Comment noted.

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**Comment:**

Communities and Place - Preparing place statements will ensure a tailored approach to each specific settlement as opposed to a one size fits all approach which may not be suitable to all settlements.

**Response:**

Comment noted. The idea of an SG on Place Statements is not being taken forward due to possible overlap with local place plans, and potential for creating too many similar types of documents.

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LDISSUE: LDMI16

**Comment:**

CSGN and Falkirk Greenspace - Identified green network corridors are supported as playing a key part in providing attractive places to live. Allocation of the site at Drove Loan (site 0115) will increase the number of people with direct access to the network.

**Response:**

Comment noted. It is not clear how the allocation of the Drove Loan site would bring any significant benefit to the green network, or increase the number of people with access to the network.

LDISSUE: LDMI17

**Comment:**

A 15% flexibility allowance is reasonable and appropriate in terms of identifying a sufficiently flexible housing land requirement. Allocations of housing land must be sufficiently flexible to provide a range and choice of housing sites in a range of locations. Relying on a small number of large sites (as is the case in Denny and Dunipace) could restrict housing delivery within the communities.

**Response:**

The Proposed Plan has added a 14% generosity allowance to the housing supply target. 14% is within the margin required by Scottish Planning Policy (10 to 20%) to be added to the target to establish the housing land requirement. LDP2 has enough housing land allocated, with enough flexibility to meet the housing land requirement and fulfil Scottish Planning Policy requirements.

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LDISSUE: LDMI19                      MIR2/DEN      MIR2 Denny and Dunipace Sites

**Comment:**

The site at Drove Loan (site 0115) is promoted as a modest housing allocation (of 25 units or greater should the Council consider it appropriate) to supplement existing allocations in Denny and Dunipace, in order to promote an appropriate range and choice of housing in an attractive location and to help make up any short or medium term shortfall in the housing land supply. The site will assist in the delivery of the planned capacity enhancement at Head of Muir primary school.

**Response:**

The site is not identified as a housing proposal in the Proposed Plan. Development of this site would represent an erosion of the green belt contributing towards a coalescence of Denny and Bonnybridge. The site does not represent a logical rounding off of the urban area.

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**Comment:**

Broad Street (site 0067) no longer has a developer attached. It should be acknowledged that the site may not deliver 200 units within the 2020-2030 period. This will impact upon the number of units that can be delivered during the plan and post plan period.

**Response:**

The Council considers the site to be likely effective during the period of LDP2. A developer is progressing the site and a Proposal of Application Notice has been submitted.

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**Comment:**

The former Denny High School (site 0012) has no identified developer and has appeared in the Housing Land Audit since 2004. The lack of a current planning consent/ application/ developer interest casts doubt on the site's deliverability in the short to medium term.

**Response:**

The site is considered effective in the period of the plan. It is in the ownership of the Council who are preparing a masterplan with a view to developing it for Council new build.

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No. of comments: 7

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|   |        |          |                                  |
|---|--------|----------|----------------------------------|
| <b>Polmont Gospel Hall</b>  |        |          | 02871/FLDP_MIR/3001/001          |
| LDISUE:   | LDMI19 | MIR2/BRS | MIR2 Braes and Rural South Sites |
| <b>Comment:</b>   |        |          |                                  |
| Polmont Gospel Hall seek to identify land for development (use not specified) within their landholdings. No site boundary identified.   |        |          |                                  |
| <b>Response:</b>  |        |          |                                  |
| Comment noted. However, no site boundary was identified in order to consider the site for inclusion.  |        |          |                                  |
|   |        |          | No. of comments: 1               |
| <b>Private Land Lord</b>  |        |          | 02751/FLDP_MIR/3001/001          |
| LDISUE:   | LDMI19 | MIR2/FAL | MIR2 Falkirk Sites               |
| <b>Comment:</b>   |        |          |                                  |
| Supports conversion of Victoria Buildings to flats, with land around redeveloped, which would help regenerate the area round about.   |        |          |                                  |
| <b>Response:</b>  |        |          |                                  |
| Comment noted. The Victoria Buildings site has not been identified as a specific housing proposal in the Proposed Plan, as there is a range of uses which may be suitable.  |        |          |                                  |
|   |        |          | No. of comments: 1               |
| <b>R M Reid &amp; Son</b>   |        |          | 02788/FLDP_MIR/3001/001          |
| LDISUE:   | LDMI19 | MIR2/FAL | MIR2 Falkirk Sites               |
| <b>Comment:</b>   |        |          |                                  |
| Objects to any future allocation of the site at Glen Farm, Falkirk (site 121) for housing, which is identified as a non-preferred site in the MIR. Objector is the tenant farmer of the site. Various issues and constraints are highlighted including visual impact, its location beyond the natural settlement boundary, poor vehicular access, low accessibility, increased pressure on schools, impact on adjacent wildlife areas and flooding. Development would also have an adverse impact on the Milk Barn, and therefore on local tourism. The fields in question are the best quality agricultural fields in the farm holding, giving serious impact on the farm business. The objector is a secure tenant and would resist resumption of the land through court proceedings. |        |          |                                  |
| <b>Response:</b>  |        |          |                                  |
| The site at Glen Farm, Falkirk has not been identified as a proposal in the Proposed Plan. The site is not considered a suitable location for expansion of Falkirk due to a poor fit with the existing urban area, potential landscape and ecological impacts, and its generally low accessibility.   |        |          |                                  |
|   |        |          | No. of comments: 1               |

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LDISSUE: [LDMI19](#)      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

57 standard letters from local residents submitted by Reddingmuirhead and Wallacestone CC objecting to development at Standrigg Road, Wallacestone (site 147). The objection is made on the grounds of loss of green belt land and its recreational value, impact on wildlife, roads, healthcare, education, Polmont rail station parking and power supply.

**Response:**

The site at Standrigg Road 1 has not been allocated as a proposal in the Proposed Plan. The site does not represent a logical extension to the urban area, has low overall accessibility and there are constraints on the local road network. There would be potentially significant landscape impacts, due to its topography.

**Comment:**

We object to the development of the site at Standrigg Road (Site 147) because: the development will occupy areas which are currently enjoyed by many people on a baily basis; views of the surrounding countryside will be destroyed; the development will destroy the habitat of deer, badgers, foxes and birds; development will lead to the coalescence of Brightons and Wallacestone with Maddiston and California; increased road traffic will cause additional pollution and be to the detriment of road safety; local schools and health centres are at capacity; and additional pressure will be placed on parking at Polmont Station.

**Response:**

Comments noted. The Proposed Plan does not identify the site as a housing proposal due to the potential for landscape/ecological impacts, local road network constraints, and the relatively low accessibility of the site.

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No. of comments: 2

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**Mr David J Reid**

02725/FLDP\_MIR/3001/001

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LDISSUE: [LDMI19](#)      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Mr J Reid seeks the inclusion of a site at Reddingmuirhead Road, Shieldhill (site 55) for housing development.

**Response:**

The site is proposed for de-allocation in the Proposed Plan, due to issues with effectiveness and delivery. However, the site will be retained in the Urban Limit, which would enable it to come forward should the site's constraints be capable of being overcome.

**Comment:**

Mr David J Reid seeks the inclusion of Middlerigg Farm (site 211) for housing. The site is considered effective, and Taylor Wimpey are progressing the site. The site is a revised scheme, smaller than previously submitted, in line with community aspiration. The site will also deliver greenspace, and will integrate well into the village.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. Reddingmuirhead has been subject to very substantial development over recent years, and LDP1 decided on a strategy of consolidation for this part of the Braes. It is considered appropriate that this strategy remain in place, and that incremental growth around the fringes of Reddingmuirhead and Wallacestone is not the optimum option for further growth in the Braes.

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No. of comments: 2

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|   |        |          |                                  |
|---|--------|----------|----------------------------------|
| <b>Ms Ruth Robb</b>   |        |          | 00785/FLDP_MIR/3001/001          |
| LDISSUE:  | LDMI19 | MIR2/BNS | MIR2 Bo'ness Sites               |
| <b>Comment:</b>   |        |          |                                  |
| Objects to the allocation of land at Crawfield Road, Bo'ness (site 102) for housing. Site is green belt. There are many other sites in the town which would benefit from regeneration, and benefit the town centre. Development would be occupied by commuters as there is almost no local employment. The local school is full. The A706 is very busy. Water supply is at capacity.                                  |        |          |                                  |
| <b>Response:</b>  |        |          |                                  |
| The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.   |        |          |                                  |
|   |        |          | No. of comments: 1               |
| <b>Messrs Robertson</b>   |        |          | 02873/FLDP_MIR/3001/001          |
| LDISSUE:  | LDMI19 | MIR2/BRS | MIR2 Braes and Rural South Sites |
| <b>Comment:</b>   |        |          |                                  |
| Messrs Robertson seek the inclusion of a site at Gilandersland, Maddiston (site 144) for housing. The site is considered effective in terms of ownership, and is relatively free of constraint, and is located in an area of proven marketability.  |        |          |                                  |
| <b>Response:</b>  |        |          |                                  |
| The site has not been identified as a housing proposal in the Proposed Plan. Reasons include landscape impact, loss of prime agricultural land and lack of capacity at Maddiston Primary School to accommodate scale of development.  |        |          |                                  |
|   |        |          | No. of comments: 1               |
| <b>Mr Arthur Robertson</b>  |        |          | 02925/FLDP_MIR/3001/001          |
| LDISSUE:  | LDMI19 | MIR2/BNS | MIR2 Bo'ness Sites               |
| <b>Comment:</b>   |        |          |                                  |
| Questions the lack of justification for the proposed allocation of land for housing at Crawfield Road, Bo'ness (site 102). Development of green belt should be a last resort. Insufficient explanation is provided on why Bo'ness Foreshore is not being progressed instead.  |        |          |                                  |
| <b>Response:</b>  |        |          |                                  |
| The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.   |        |          |                                  |
|   |        |          | No. of comments: 1               |
| <b>Mrs L Robertson</b>  |        |          | 02866/FLDP_MIR/3001/001          |
| LDISSUE:  | LDMI19 | MIR2/BRS | MIR2 Braes and Rural South Sites |
| <b>Comment:</b>   |        |          |                                  |
| Mrs L Robertson seeks the inclusion of a site for housing at Wesleymount Farm 1 (site 214) at California.   |        |          |                                  |
| <b>Response:</b>  |        |          |                                  |
| The site does not represent a logical extension of the existing allocated site. Church Road is constrained and is not suitable for accessing the proposed scale of additional development. There is an apparent lack of demand for new housing in California and the site has potentially high development costs. The site is therefore not proposed for allocation for residential development in the Proposed Plan. |        |          |                                  |

**Mr Fred Robinson**

02824/FLDP\_MIR/3001/001

LDISUE: LDMI19      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Objects to the allocation of land for housing at Crawfield Road (site 102). Site is green belt which was protected in last plan. Local views are now being ignored. Site is an important amenity for the town. Query about financial gains for the Council. Foreshore should be prioritised, along with the Drum.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release. Bo'ness Foreshore is not considered to an effective site for large scale growth due to constraints, high development costs and viability issues.

**Jules Robinson**

02906/FLDP\_MIR/3001/001

LDISUE: LDI002

**Comment:**

Largely agrees with the vision. It is critical that Falkirk High Street is revitalised. Further housing must be preceded by investment in infrastructure.

**Response:**

Comment noted. The Spatial Strategy and policies in the Proposed Plan seek to maintain the health and vitality of town centres by encouraging regeneration, improving transport links and accessibility, and promoting the 'town centre first' principle which seeks to prioritise town centres as the first choice for uses which generate significant footfall. The Proposed Plan seeks to ensure that infrastructure is provided alongside new housing development.

LDISUE: LDMI16

**Comment:**

Incentivise landowners to retain green spaces, encourage low density housing similar to the lowland croft scheme seen elsewhere

**Response:**

The density of sites should be informed by their location and characteristics in order to ensure a satisfactory development mix and landscape fit. Housing in the countryside continues to be permissible only in specific circumstances, which include where there is a countryside need for the dwelling or business. Most new development is required to provide open space, either on or off-site, as well as contribute to the Falkirk Green Network.

LDISUE: LDMI17

**Comment:**

Important that affordable social housing is built. Growth is good but only if there is infrastructure to support it. Housing should be built on brownfield and infill sites, including sub-division of plots and extending properties to support multi-generational living.

**Response:**

Proposed Plan policy requires new developments of 20 units or over to provide between 15-25% affordable housing, depending on the locality. The Council seeks to support the delivery of housing on brownfield and urban capacity sites through policies in the Proposed Plan, and continues to explore delivery and funding mechanisms such as the Housing Infrastructure Fund to deliver constrained brownfield sites, and new infrastructure to support them.



LDISUE: LDMI19

**Comment:**

Preferred options for housing are supported, especially Falkirk Town Centre and Falkirk Gateway housing.

**Response:**

Support noted.

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**Comment:**

Objects to potential development of land at Standrigg Road, Brightons (site 221) for housing due to traffic problems on Standrigg Road and capacity issues at local primary schools.

**Response:**

The Standrigg Road site (site 147) has not been allocated as a housing proposal in the Proposed Plan. It does not represent a logical extension to the urban area, has low overall accessibility, and the local road network is constrained. There would be potentially significant landscape impacts, due to its topography.

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LDISUE: LDMI21

**Comment:**

Agrees with the preferred options for town centres. Highlights potential for live/work units in the Town Centre.

**Response:**

Support noted. Policies in the Proposed Plan seek to maintain the vitality of town centres by encouraging residential uses, which could include live/work units.

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LDISUE: LDMI23

**Comment:**

Developers should bear responsibility for infrastructure improvements needed to support development.

**Response:**

Existing LDP policies, as well as policies in the Proposed Plan require new development to contribute to infrastructure requirements where appropriate. The Council will prepare new Supplementary Guidance on Developer Contributions.

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LDISUE: LDMI24

**Comment:**

There should be no further investment in carbon based energy.

**Response:**

Policies in the Proposed Plan seek to reduce the energy requirements of buildings, and ensure that they include embedded renewable technologies, and decentralised energy provision. The Council will be producing new Supplementary Guidance on renewable and low-carbon development.

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LDISUE: LDMI25

**Comment:**

There should be no unconventional gas extraction in Falkirk.

**Response:**

Comment noted. The Proposed Plan sets out the criteria which mineral proposals (including onshore oil and gas) must meet to address concerns on the environment, infrastructure and communities. Notwithstanding this, the Scottish Government's policy position resisting the development of unconventional oil and gas remains in place.

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LDISUE: LDMI17

**Comment:**

Agree that housing growth targets should be reduced as proposed.

**Response:**

Comment noted.

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LDISUE: LDMI18

**Comment:**

More stalled sites should be removed.

**Response:**

Comment noted. The Proposed Plan proposes to remove a number of non-effective sites.

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LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

I object to the development of the site to the south of Standrigg Road (Site 221). There is inadequate road infrastructure all along Sunnyside Road/ Standrigg Road, in particular at the bend in the road adjacent to Westquarter Cricket Club and the adjoining nursery. Increasing the amount of traffic will be to the detriment of road safety. Development will also increase the pressure on local amenities such as schools doctors and dental surgeries and on services, water and drainage. Brownfield sites should be used for housing rather than allocating new houses on green spaces.

**Response:**

Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. The site is therefore not identified for housing development in the Proposed Plan.

LDISUE: LDMI21

**Comment:**

There are far too many private landlords with buildings in the town centre who have unrealistic ideas on shop rentals. Some practical help for small businesses would be useful.

**Response:**

Comment noted. The issues raised are not within the remit of the Local Development Plan.

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LDISUE: LDMI23

**Comment:**

I think the existing infrastructure (especially existing roads) should have remedial action, as many are in a poor state of repair (and have been for a number of years). I am not in favour of a collaborative approach to infrastructure, when done in conjunction with property developers, as I think a developer will only do the bare minimum to satisfy any infrastructure upgrade, as their main (or maybe only) focus is on maximising the profit which can be made from a piece of land, to the exclusion of any other consideration.

**Response:**

Comments are noted.

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LDISUE: LDMI24

**Comment:**

I fully support the use of renewable forms of energy, especially solar and wave sources.

**Response:**

Comment noted.

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LDISUE: LDMI25

**Comment:**

The council should block any attempt to extract fossil fuels through the process of fracking within the area.

**Response:**

Comment noted. Policies IR15 and IR16 would likely be determining policies for a planning application relating to unconventional gas or oil extraction. The policies reflect current Scottish Planning Policy, which set out Scottish Ministers' expectations for local development plans.

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No. of comments: 7

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**Ms Kathryn Rosevear**

02921/FLDP\_MIR/3001/001

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LDISUE: LDI002

**Comment:**

I am in full agreement with the vision.

**Response:**

Supporting comment is noted and welcomed.

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LDISUE: LDMI15

**Comment:**

High quality places can be created by ensuring no building on green spaces or areas which aren't already allocated for development.

**Response:**

Comment noted.

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LDISUE: LDMI17

**Comment:**

I fully agree with reducing the housing targets as proposed in the preferred option.

**Response:**

Support noted.

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LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

The site at Standrigg road in Brightons (Site 221) should not be allocated for housing. Local schools and doctors surgeries don't have the available capacity. Increased traffic on Standrigg Road would be to the detriment of road safety as the road is narrow and without pavements in places. There would also be an impact on the sewerage system.

**Response:**

Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. The site is therefore not identified for housing development in the Proposed Plan.

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LDISSUE: LDMI20

**Comment:**

Agree with the preferred option for major employment sites.

**Response:**

Support noted.

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LDISSUE: LDMI21

**Comment:**

Agree with the preferred option for dealing with our town centres.

**Response:**

Support noted.

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LDISSUE: LDMI22

**Comment:**

Redevelopment of/ investment in Falkirk town centre would help to boost tourism in the area.

**Response:**

Comment noted. The Proposed Plan has a significant focus on Falkirk Town Centre, identifying it as a major area of change with significant development opportunities. The plan adopts the Scottish Government's town centre first principle, preferring urban centres, such as Falkirk Town Centre, as the first choice for major footfall uses.

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LDISSUE: LDMI23

**Comment:**

Creating better transport links to Falkirk and surrounding areas, creating new paths and creating new parks should be the priority for new infrastructure.

**Response:**

Comment noted. The Proposed Plan identifies key strategic active travel opportunities for future development and supports other strategies promoting active travel e.g. The Core Paths Plan.

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LDISSUE: LDMI24

**Comment:**

Agree with the preferred option for the issue of energy.

**Response:**

Support noted.

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LDISSUE: LDMI25

**Comment:**

Agree with the preferred option for the issue of onshore gas, minerals and waste.

**Response:**

Support noted.

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No. of comments: 10

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**Roy Mitchell Design Ltd**

00193/FLDP\_MIR/3001/002

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LDISSUE: LDMI17

**Comment:**

The Housing Supply Target is set too low and is destined to fail due to the existing constrained land supply and the lack of new effective allocations being proposed. A far more ambitious approach is required.

**Response:**

The housing supply target reflects the HNDA and the projected reduction in the rate of household growth in the area. A flexibility allowance of 14% has been included, which complies with the range required by SPP.

**Comment:**

Existing allocated sites throughout Falkirk need to be assessed for effectiveness, (otherwise allocating them is a paper exercise) and then supplemented or replaced by more effective sites. The MIR recognises Torwood falls within an area of high demand but existing allocated sites are failing to perform, which says more about the sites than the marketability of the area.

**Response:**

The effectiveness of sites has been fully assessed through the LDP2 process and is considered annually through the Housing Land Audit (HLA), with the 2016/17 HLA being used for the Proposed Plan.

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LDISSUE: LDMI19                      MIR2/RURN    MIR2 Rural North Sites

**Comment:**

Seeks inclusion of Blairs Farm Torwood (site 152) for a mixed use development including residential (50 units), a hotel/restaurant, a local shop, a Garden Centre, public open space and woodland planting. The site comprises flat agricultural land adjacent to Torwood.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. It would represent a major extension of Torwood on the opposite site of the A9. There are significant environmental impacts, as well as education constraints and access issues. Given lack of local facilities and poor accessibility to other services significant housing growth in Torwood not favoured.

**Comment:**

The preferred allocation at Newton Avenue South Skinflats (site 165) should not be supported going forward. Aside from a range of related environmental impacts there is simply no likely market for such a development.

**Response:**

Newton Avenue South Skinflats (site 165) has not been identified as a housing proposal in the Proposed Plan.

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No. of comments: 4

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LDISUE: LDMI21                      MIR2/FAL      MIR2 Falkirk Sites

**Comment:**

Royal Mail's Falkirk Delivery Office (DO) should not be identified as part of the development opportunity at Grahamston in Falkirk Town Centre (site 70). There are no plans to vacate the site which is critical to current operations and ideally located. Residential development in proximity would be inappropriate due to early morning operation of the DO. Also there should be no disruption to the road network or layout of Royal Mail operational land. DO vehicles park in the adjacent car park and these spaces are essential.

**Response:**

The Royal Mail's intentions with regard to the Delivery Office are noted. Nonetheless, it is considered appropriate to include the Delivery Office in the opportunity area at this stage, pending further investigation into the scope of the opportunity, given its close relationship with the surrounding land. Royal Mail would be fully involved in these investigations and their operational needs would be taken into account.

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No. of comments: 1

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RSPB 00977/FLDP\_MIR/3001/001

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LDISUE: LDMI16

**Comment:**

The identification of access corridors along the Foreshore should be done with a caveat that any application must be accompanied by project specific information to inform an appropriate assessment. The link between Airth and Dunmore raises concerns for any impact on wintering birds. The consolidation of supplementary guidance on green infrastructure into one SG is welcomed although it should also be referenced from other SG to ensure it is part of the whole infrastructure requirement for a site rather than an afterthought. The commitment to review and update the list of locally designated wildlife sites through the LDP2 process is welcomed.

**Response:**

The requirement for project specific information to enable an appropriate assessment to be undertaken has been added to the proposals schedule. Green infrastructure is an important part of the LDP and is identified in the Vision, Spatial Strategy and in Table 4.1 Potential Areas for Developer Contributions. The list of locally designated wildlife sites has been updated.

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LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

The deallocation of Hillend Farm (057) is supported. This site has the potential to impact on the foraging range of birds associated with the Slamannan Plateau SPA.

**Response:**

The Proposed Plan has de-allocated most of Hillend Farm. A small part of the site at the east end (site 205) has been retained as a housing opportunity

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**Comment:**

The allocation of sites 128, 162 and 163 adjacent to the Firth of Forth SPA raises concerns about: the potential direct loss of inter-tidal habitats; impacts on inter-tidal habitat from the maintenance of the sea wall; indirect loss of habitat from changes in coastal processes such as dredging; construction and operational activities; lost opportunity for a potential coastal realignment site; release of cooling water impacting on invertebrates/food source and the introduction of non native invasive species through transport movements and increases in water temperature. Assessment should not all be postponed to project level but should be carried out at the LDP stage and will need to include alternative locations. The identification of a site for a thermal power station would also need to demonstrate compatibility with Scotland's carbon reduction targets.

**Response:**

Site 128 is maintained as an area identified for business and industry as in the previous plan. To reflect the existing situation with Site 162, Site 163 is also brought within the urban area. None of the sites are allocated as business proposals. NPF3 identifies Grangemouth as a site for a Carbon Capture and Storage development however a specific site location is not identified.

**Comment:**

Grangemouth Flood Protection Scheme has the potential to impact on the Firth of Forth SPA. Not engaged with project and would welcome opportunity to discuss. A wide range of options for offsetting potential effects should be considered. Compensatory measures could include new roosting structures, habitat creation and management elsewhere within the Firth of Forth/Forth Islands. Additional land may need to be identified through the LDP process to accommodate this.

**Response:**

The Grangemouth Flood Prevention Scheme will be brought forward under the Flood Risk Management (Scotland) Act 2009 rather than through the planning system. Policies within LDP2 will however support compensatory measures as required.

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**Comment:**

An area identified for potential windfarm development next to the Forth appears to include part of the Skinflats Reserve. This area has a similar level of constraints as adjacent areas and should be identified as an area of significant protection before it is incorporated into LDP2. See also comments on the proposed CCS plant under sites 128, 162 and 163. The preferred option for LZCGT is supported.

**Response:**

A small area to the north of Skinflats is identified indicatively as an area with potential for wind farming subject to detailed consideration. This classification of land reflects the requirements identified in SPP. It is noted that the Skinflats Reserve is not a designated wildlife site however ecological impact would be fully assessed against Policy PE19. The preferred option for the LZCGT policy has been carried through into the plan.

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LDISSUE: LDMI25

**Comment:**

The preferred option to maintain the current policy subject to the Scottish Government review is supported. A precautionary approach should be taken to all unconventional gas development. In the context of buffer zones RSPB consider national and international protected areas for wildlife/nature reserves to be sensitive receptors which require protection. If Scottish Government support such development supplementary guidance should be adopted prior to determining applications to address issues such as impacts on species and habitat and aftercare and restoration. RSPB's report "Are we fit to frack" is noted.

**Response:**

References to unconventional oil and gas are maintained in the plan as while there is a moratorium on granting consents SPP recognises the national benefit of indigenous oil and gas production and sets out development plan requirements for areas covered by Petroleum Exploration and Development Licences. Policy IR16 includes a number of factors that minerals proposals will be assessed against including impacts on sensitive receptors, nature conservation and biodiversity with reference to Policy PE19. Sensitive receptors as defined in SPP may include fauna and flora.

No. of comments: 6

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**Scotland Fire and Rescue Service**

00331/FLDP\_MIR/3002/002

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LDISSUE: LDMI17

**Comment:**

The MIR has set a reduced housing supply target of 480 homes per annum. The supply target should remain realistic and ambitious and should seek to deliver growth above the 500 homes average, rather than seek a lower target. The housing supply flexibility of 15% is welcomed, but this could be further increased.

**Response:**

The Housing Need and Demand Assessment (HNDA) identifies a housing need at 418 homes per year. The Council has increased this to a housing target of 450 homes per year over the period 2020-2030. While this is a reduction from LDP1, the target is higher than the HNDA estimate and more closely reflects current population trends: lower household projections and a general slowdown in household formation. This figure, however, is still a very substantial level of housing for the Falkirk Council area. The Proposed Plan has applied 14% flexibility allowance. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr. This lower target still meets the projected household needs of the Council area identified in the HNDA as 418/yr so at a minimum this would be 4180 for 2020 – 2030 (supply gives 25% flexibility from base HNDA figure).

LDISSUE: LDMI19

**Comment:**

SFRS welcome the LDP2 Objectives (para. 2.15) relating to the goal of Thriving Communities and highlight the importance of facilitating population and household growth, and the provision of required infrastructure. Suitable, available and sustainable brownfield sites should be fully supported by the Council for the delivery of new homes.

**Response:**

Comment noted.

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**Comment:**

The Scottish Fire and Rescue Service support the allocation of Maddiston Fire Station (site 140) as a preferred option for redevelopment. However, they object to the identification of the site in the MIR for employment and community use. The site is a large, brownfield site within an established residential area. The MIR does not indicate the scale, type or strategic need for employment land and community uses in this area, and offers no market evidence to justify the allocation. The site is not referenced in Technical Report 6.

**Response:**

The site is identified in the Proposed Plan for business, retail and community use. The site is a prominent brownfield site within the village core, and is ideally placed to accommodate community/business uses, serving this growing community, subject to further assessment. Community needs are currently being assessed through the community planning process. It has not been proven that there is no demand for retail and business use on the site.

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No. of comments: 3

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**Scottish Canals**

00516/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

The vision is a good one but would be even more relevant if there was reference to 'bluespaces' as well as greenspaces.

**Response:**

'Greenspace' is a generic term embracing the water environment as well as terrestrial open space. In the Spatial Strategy, reference has been made to the Green and Blue Network, acknowledging the important role which the water environment plays in landscape, ecological and active travel networks.

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LDISSUE: LDMI16

**Comment:**

Canals should be at the heart of the placemaking strategy for the area wherever possible.

**Response:**

Agreed. The role of canals in placemaking is referenced in the 'Place' section of the Spatial Strategy,

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LDISSUE: LDMI19

**Comment:**

The canal corridor is a key priority and green network opportunity. It should also be seen as an opportunity for sustainable drainage infrastructure. A recent monitoring report has shown that areas beside canals in central Scotland have performed better in terms of housing and development delivery than areas outwith the canal corridor. The canal corridor should therefore be prioritised as a key opportunity to deliver more sustainable development.

**Response:**

The canal corridor is identified as a key element within the 'Green and Blue Network' section of the Spatial Strategy. Falkirk Canal Corridor continues to be identified as a green network opportunity. A policy on canals continues to be included in the Proposed Plan, including support for the use of the canals as part of surface water management strategies.

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LDISSUE: LDMI22

**Comment:**

There are further opportunities for growing leisure and tourism around the canal corridor and particularly at the Helix / Kelpies and the Falkirk Wheel /Tamfourhill area and at Rosebank.

**Response:**

Agreed. The canal corridor is defined as a key tourism theme in the Spatial Strategy, and several canal related tourism opportunities are identified in the plan including the Falkirk Wheel, Falkirk Gateway, Rosebank and the A801 Union Canal.

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LDISSUE: LDMI23

**Comment:**

In addition to forming part of the green network and tourism infrastructure of the area the canal corridor should also be highlighted as an opportunity for sustainable drainage infrastructure. This provides new income streams which are reinvested in the canal network. Developers should be required to consider this as an opportunity to unlock development sites. Developer contributions should where relevant also be directed towards investing in upgrading canal infrastructure to receive and manage additional water from drainage.

**Response:**

The canals policy in the Proposed Plan supports their use, where appropriate, as part of sustainable surface water management strategies.

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No. of comments: 5

**Scottish Enterprise**

00447/FLDP\_MIR/3002/001

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LDISSUE: LDMI20                      MIR2/LAR      MIR2 Larbert and Stenhousemuir Sites

**Comment:**

Seeks a more flexible approach to the use classes permitted at Glenbervie (site 092). This is needed to add value to the site to offset the high site development costs. Other kinds of uses can contribute to the economic development of the area and provide similar employment densities. SE are working on a Market Demand Assessment on a range of possible alternative uses which will be shared with the Council once complete.

**Response:**

The Glenbervie site (092) is retained exclusively for business/industry in the Proposed Plan. There is considerable flexibility within this definition, but housing is not considered appropriate. Glenbervie occupies a key location next to the motorway network and Forth Valley Royal Hospital, expanding the scope for non-business uses would impact on the scale and flexibility of the employment land remaining.

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No. of comments: 1

**Scottish Natural Heritage**

00646/FLDP\_MIR/3002/001

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LDISSUE: LDMI15

**Comment:**

Consolidation of existing design policies is supported. On the proposal for place statements, SNH highlight approaches and examples in other authorities and LDPs, and strongly supports community involvement.

**Response:**

Support for policy consolidation is welcomed. The idea of an SG on Place Statements is not being taken forward due to possible overlap with local place plans, and potential for creating too many similar types of documents.

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LDISUE: LDMI16

**Comment:**

The preferred option for Falkirk Greenspace/CSGN is supported, although north-south gaps in the green network are highlighted. Outdoor access may no longer be a viable option for the Bothkennar/Skinflats opportunity due to Firth of Forth SPA impacts. Opportunities for connections as part of the Falkirk Investment Zone are highlighted. Figure 3.2 should be amended to reflect that community growing sites can support biodiversity. Connections between some green network opportunities and the National Marine Plan are highlighted. The carrying forward and updating of SG on landscape character assessment is supported, as is the proposal to consolidate SG on green infrastructure, with Fife Council cited as an example. On open space, aligning policy with the Open Space Strategy is supported, although further clarity is sought on the preferred and alternative approaches to the loss of open space. In relation to soils, saltmarsh should be included as a carbon rich soil and a habitat that contributes to climate change adaptation. Preferred options for forestry and woodland, and protected habitats are supported. The water environment section should include reference to transitional waters under the Water Framework Directive.

**Response:**

Comments noted. The issue with north-south linkages is recognised, and the Council is working to address this issue through detailed projects such as the Abboshaugh Bridge over the River Carron. The biodiversity value of community growing areas is acknowledged and the table has been amended accordingly. A new policy on marine planning is included in the Proposed Plan, and has links to other related policies in the plan. The approach to loss of open space is outlined in the relevant policy of the Proposed Plan, with further guidance to be provided through SG05 Green Infrastructure and New Development. Salt marsh has been recorded as a carbon rich soil in the relevant policy.

LDISUE: LDMI19

**Comment:**

Scottish Natural Heritage provide detailed comments and recommendations in relation to a number of the preferred and non-preferred sites in the MIR where there is a particular need to consider natural heritage assets.

**Response:**

Detailed comments have been taken into account in site assessment and mitigation included where appropriate in development guidance.

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LDISUE: LDMI20

**Comment:**

In relation to the Falkirk Investment Zone, the preferred option for more mixed use aligns with SPP. The preferred option for Hill of Kinnaird 2 (site 94) for mixed use is supported. The proximity of Glenbervie (site 92) to the motorway is noted, which would have to be addressed in siting and design of housing if this were to be promoted for mixed use.

**Response:**

Comments noted. Mixed use approach to the Falkirk Gateway and Hill of Kinnaird 2 has been carried into the Proposed Plan. Glenbervie will remain a business site.

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**Comment:**

Highlights potential implications of the Carbon Capture and Storage (CCS) and Grangemouth Docks sites in relation to HRA and policies within the National Marine Plan (NMP). Detail on CCS remains uncertain, but a range of NMP policies may be relevant and LDP2 should ensure alignment. LDP2 should highlight the need for further assessment and detail. The potential allocation of additional Dock sites could generate issues for the marine environment and should be based on robust environmental assessment including HRA.

**Response:**

Allocated sites at Grangemouth Docks have been assessed as part of the SEA and HRA and appropriate mitigation wording has been included in the Proposed Plan. A new policy on marine planning is included in the plan which supports and cross refers to the National Marine Plan.

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LDISSUE: [LDMI21](#)

**Comment:**

Emphasis should be on encouraging Town Centre visits which are not reliant on cars. Active travel should be improved and the identification of routes in the context of the green network should be pursued.

**Response:**

Comment noted. The guidance for the Falkirk Town Centre Major Area of Change includes provision for strengthening path links and connections with the wider urban area and green network.

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LDISSUE: [LDMI22](#)

**Comment:**

Scottish Natural Heritage generally agree with the tourism nodes, themes and opportunities highlighted in the MIR but suggest that some other nodes, e.G. Callendar House and Park, have a relationship with the canal network; that long distance routes should be considered as part of the network; and that the coast should be considered as a tourism opportunity in its own right.

**Response:**

Callendar Park and House is not considered to have a direct relationship with the canal network. Long distance routes and the coast are encompassed by the the CSGN, which is included as a tourism theme.

LDISSUE: [LDMI23](#)

**Comment:**

Advice is provided on HRA requirements in relation to the Grangemouth Flood Protection Scheme (FPS). Although there remains uncertainty on impacts, it is probable that appropriate assessment of this proposal will not be able to conclude no adverse effect on site integrity. Since there are unlikely to be alternative solutions, the Council will have to demonstrate imperative reasons of overriding public interest. The text on the Grangemouth Investment Zone does not mention the FPS. It could have cumulative and synergistic effects with other proposals.

**Response:**

Advice noted. The Grangemouth Flood Protection Scheme is not included as a proposal in the Proposed Plan. The project has its own process and Appropriate Assessment will be undertaken as part of that process.

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**Comment:**

Funding for infrastructure should include all types set out in the MIR. Experience shows that many LDPs have positive aspirations for green infrastructure but do not set out the required framework for funding. LDP2 should provide more certainty on developer contributions. The 'global infrastructure levy' option is queried as it may lead to some forms of infrastructure being underfunded.

**Response:**

Comment noted. Green infrastructure is explicitly included as a potential area for developer contributions in the Proposed Plan. More guidance will be provided in the SGs on 'Developer Contributions' and 'Green Infrastructure and Development'.

LDISSUE: [LDMI24](#)

**Comment:**

The preferred option on heat networks is supported. Opportunities to co-locate heat networks with other networks such as green infrastructure should be considered. LDP2 should set a strong direction on heat networks at the design/masterplan stage.

**Response:**

Support welcomed. The approach has been set out in a new policy on heat networks within the Proposed Plan.

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LDISUE: LDMI25

**Comment:**

The preferred approach is supported as there is currently no timescale for the lifting of the national moratorium on unconventional oil and gas.

**Response:**

Support welcomed.

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No. of comments: 11

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**Scottish Water**

00466/FLDP\_MIR/3001/001

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LDISUE: LDMI23

**Comment:**

Scottish Water (SW) remains committed to working with the Council and others to deliver an effective LDP which helps deliver sustainable economic growth within Falkirk. Comment is provided on water/waste water aspects of sites within the MIR. The process for developers engaging with SW is outlined, as are the growth criteria for considering upgrades to water and waste water treatment works. SUDS principles are supported. Completion date for the Torwood WWTW growth project should be removed as it is subject to change.

**Response:**

Comments noted.

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LDISUE: LDMI24

**Comment:**

Proposals for wind farms, solar farms or fuel storage should be submitted to Scottish water for review to identify whether there are Drinking Water Protected Areas present which would require protection through mitigation actions. Other Scottish Water operations and assets may also be affected.

**Response:**

Comment noted. This is a procedural issue for the development management process.

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No. of comments: 2

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**Ms Briony Sedgwick**

01260/FLDP\_MIR/3001/001

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LDISUE: LDI002

**Comment:**

The vision is an exciting one.

**Response:**

Supporting comment is welcomed.

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LDISUE: LDMI19      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Expansion of Bo'ness at Crawfield Road (site 102) seems the most sensible area, if this level of new housing is required. Focusing on existing sites that would be better developed first also seems sensible. Alternative site at Muirhouses (site 105) seems unnecessary at this stage given the level of impact it would have on the area.

**Response:**

Neither the site at Crawfield Road nor the sites at Carriden/Muirhouses have been allocated as housing proposals in the Proposed Plan. A strategy of consolidation is being pursued, with the focus on existing allocated sites.

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No. of comments: 2

LDISUE: LDI002

**Comment:**

The sustainable place objectives should refer to the green and blue network. This will help to maintain and enhance the blue network by helping to deliver measures in the River Basin Management Plan and contribute to sustainable flood management.

**Response:**

Green network is an over-arching term, which includes the blue network. Nonetheless the relevant part of the spatial strategy and the green network policy has been renamed to reflect SEPA's preference and to emphasise the importance of the water environment as part of the green network.

LDISUE: LDMI15

**Comment:**

Good air quality should be included as an element of sustainable place making in any consolidated design policy. The forthcoming placemaking Supplementary Guidance should consider local air quality and, where appropriate, include siting and design options that would help local air quality.

**Response:**

Policy PE26 allows for the consideration and mitigation of air quality issues in connection with a relevant planning application.

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**Comment:**

Comments on the current LDP place and design policies: D01 Placemaking - require inclusion of further requirements on air quality D02 Sustainable Design Principles - support the policy but recommend highlighting the need to consider air quality

**Response:**

Comments noted and suggested amendments to LDP1 policies incorporated where appropriate into Proposed Plan policies.

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LDISUE: LDMI16

**Comment:**

References to the green network should be amended to refer to the green and blue network. References to Groundwater Dependent Terrestrial Ecosystems are welcomed. References to the Falkirk Forestry and Woodland Strategy are welcomed. References should be made to natural flood risk management opportunities.

**Response:**

The Proposed Plan recognises the role of blue networks in delivering climate change resilience, improved biodiversity, water quality and public access. Pg. 16, Para 3.10 states the blue network is "integral to the LDP2's vision and growth strategy". The Natural flood management opportunities are a matter for Forth Local Flood Risk Management Plan. Policy PE24 references Local Flood Risk Management Strategies and Management Plans as a consideration in connection with relevant planning applications.

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**Comment:**

Comments are made on current LDP green network policies:GN01 Green Network - recommend that reference is made to the blue network as well as green networkGN04 Trees, Woodland and Hedgerows - recommend additional references to natural flood management and invasive speciesD14 Canals - support the policy but recommend minor wording changesRW04 Soils - support the policy but recommend its extension to all soils, signposting of relevant information and inclusion of policy on sustainable use of soils in development, while requiring carbon rich soils be identified as a constraint for site allocations.RW04 Water - support the policy but recommend wording on safeguarded riparian corridorsRW07 Air Quality - support reference to AQMAs but require that the policy is strengthened

**Response:**

Comments noted and suggested amendments to LDP1 policies incorporated where appropriate into Proposed Plan policies.

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LDISSUE: LDMI19

**Comment:**

SEPA have provided comment on all sites in the MIR relating to flood risk, water environment and co-location issues.

**Response:**

Noted. SEPA's comments have informed the Council's consideration of land allocations with respect to these issues. See Technical Report 2: Site Assessment and the revised Environmental Report for further detail.

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LDISSUE: LDMI20

**Comment:**

SEPA have provided comment on all sites in the MIR relating to flood risk, water environment and co-location issues.

**Response:**

SEPA's comments have informed the site selection process for LDP2 land allocations and also the strategic environmental assessment (SEA) process. See Technical Report 2: Site Assessment and the Revised Environmental Report for further detail on the Council's consideration of flooding, drainage, water and air quality matters with respect to individual sites.

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LDISSUE: LDMI21

**Comment:**

Reference should be made to the fact the Falkirk Town Centre is an Air Quality Management Area.

**Response:**

This is referenced in supporting information to the Air Quality policy in the Proposed Plan.

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LDISSUE: LDMI22

**Comment:**

Issues related to air quality and carbon emissions should be considered as part of the proposed increase in tourism.

**Response:**

Policies PE26 and IR13 allow such issues to be considered and mitigated in connection with any relevant planning applications.

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LDISSUE: LDMI23

**Comment:**

In general any infrastructure provision will require to respect policies on flooding, drainage and air quality.

**Response:**

Policies PE24, PE26 and IR10 allow flooding, air quality and drainage issues to be considered and mitigated in connection with any relevant planning applications.

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**Comment:**

Comments are made on current LDP infrastructure policies: INF01 Strategic Infrastructure - recommend that the policy cross references placemaking, air quality and NPF3 INF02 Developer Contributions - support policy but require a minor change to the text INF08-10 Transport - recommend cross referencing to placemaking and air quality, but otherwise support the policies INF12 Water and Drainage - support the policies but recommend minor changes on SUDSRW06 Flooding - require policy to cover Flood Risk Management Plans and Strategies, requirements for FRA, a precautionary approach to flood risk and other minor changes

**Response:**

Comments noted and suggested amendments to LDP1 policies incorporated where appropriate into Proposed Plan policies.

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**Comment:**

In relation to the proposal for an extension Muiravonside Cemetery (site 193) we would recommend that groundwater is investigated further due to the proximity of the site to the Manuel Burn. If no further information is provided prior to adoption a development requirement should be attached to the site requiring intrusive ground investigation is undertaken in line with our guidance on assessing the impacts of cemeteries on groundwater (LUPS GU32) before any development occurs at the site. It should be highlighted that the findings of the investigation may indicate that the site is not suitable for a cemetery due to an unavoidable impact on groundwater.

**Response:**

The Proposed Plan has incorporated SEPA's comments regarding proposed cemetery extensions and ground water investigations with sites required to meet SEPA's Guidance on Assessing the Impacts of Cemeteries on Groundwater. Detailed site investigations will be required to establish their suitability for coffin and/or casket burials.

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**Comment:**

In relation to the proposal for an extension to Grandsable cemetery at Weedingshall (site 194) we would recommend that groundwater is investigated further due to the proximity of the site to the Polmont Burn. If no further information is provided prior to adoption a development requirement should be attached to the site requiring intrusive ground investigation is undertaken in line with our guidance on assessing the impacts of cemeteries on groundwater (LUPS GU32) before any development occurs at the site. It should be highlighted that the findings of the investigation may indicate that the site is not suitable for a cemetery due to an unavoidable impact on groundwater.

**Response:**

The Proposed Plan has incorporated SEPA's comments regarding proposed cemetery extensions and ground water investigations with sites required to meet SEPA's Guidance on Assessing the Impacts of Cemeteries on Groundwater. Detailed site investigations will be required to establish their suitability for coffin and/or casket burials.

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**Comment:**

In relation to the proposal for an extension to Hills of Dunipace cemetery (site 191) we would recommend that groundwater is investigated further due to the proximity of the site to multiple small watercourses and the River Carron. If no further information is provided prior to adoption a development requirement should be attached to the site requiring intrusive ground investigation is undertaken in line with our guidance on assessing the impacts of cemeteries on groundwater (LUPS GU32) before any development occurs at the site. It should be highlighted that the findings of the investigation may indicate that the site is not suitable for a cemetery due to an unavoidable impact on groundwater.

**Response:**

The Proposed Plan has incorporated SEPA's comments regarding proposed cemetery extensions and ground water investigations with sites required to meet SEPA's Guidance on Assessing the Impacts of Cemeteries on Groundwater. Detailed site investigations will be required to establish their suitability for coffin and/or casket burials.

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**Comment:**

In relation to the extension to Camelon Cemetery (site 192) we would recommend that groundwater is investigated further. Review of the surface water 1 in 200 year flood map shows that there may be flooding issues within the site. This should be investigated further and it is recommended that contact is made with the flood prevention officer. If no further information is provided prior to adoption a development requirement should be attached to the site requiring intrusive ground investigation is undertaken in line with our guidance on assessing the impacts of cemeteries on groundwater (LUPS GU32) before any development occurs at the site. It should be highlighted that the findings of the investigation may indicate that the site is not suitable for a cemetery due to an unavoidable impact on groundwater.

**Response:**

The Proposed Plan has incorporated SEPA's comments regarding proposed cemetery extensions and ground water investigations with sites required to meet SEPA's Guidance on Assessing the Impacts of Cemeteries on Groundwater. Detailed site investigations will be required to establish their suitability for coffin and/or casket burials.

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LDISSUE: LDMI24

**Comment:**

The broadened policy approach to energy developments and the intention to consolidate the spatial framework and guidance for wind energy developments is welcomed.

**Response:**

Comments are noted and welcomed.

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**Comment:**

Heat networks - Strengthened coverage of heat networks is welcomed. The incorporation of district heating into major new developments is supported as this supports the Scottish Government's ambitions for the planning system to support a transformational change to allow for the provision of a low carbon economy that allows for renewable energy targets to be met. The LDP policy framework should ensure that major new developments incorporate space to be safeguarded for future pipework, pipe runs and energy centres. The policy framework should also ensure that any land required for the network is protected so that new development does not prejudice the future development of the planned heat network. Heat networks should not be limited to the areas identified in figure 6.4. The National Heat Map should be used to identify potential sources of heat and opportunities for locating other heat networks in the Council area. The biomass plant and energy from waste proposals should be required to provide input to the heat network.

**Response:**

LDP2 encourages the development of heat networks. Policy IR14 requires applicants to consider the potential for heat networks through submission of an energy statement. The policy states Scotland's Heat Map as a consideration to assess whether it is viable for development to connect to a heat network. The same policy safeguards piperuns within developments and also pipework to the curtilage of development as per Scottish Planning Policy requirements.

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**Comment:**

LZCGT - We would welcome a meeting with the Council to discuss issues raised by developers on why it is not practical to include LZCGT. The intention to increase the emission reduction required by policy is supported. References to the outputs of the Heat and Energy Efficiency Strategies and Regulations of District Heating should be made in the LDP as they form a critical tool of implementation.

**Response:**

Comment noted. Policy IR14 is supplemented by SG 14 'Renewable and Low-Carbon Development'. SG14 is to be updated, and the Council would be keen to engage with SEPA to ensure a future revised SG14 covers key matters.

**Comment:**

Comments on the current LDP low carbon and energy policies: D04 Low and Zero Carbon Development - support the policy but require all substantial developments to have their heat demands met by district heating and other developments to be future-proofed. RW01 Renewable Energy - support the policy but require reference to other renewable technologies and other related issues.

**Response:**

Comments noted and suggested amendments to LDP1 policies incorporated where appropriate into Proposed Plan policies.

LDISSUE: LDMI25

**Comment:**

Onshore gas and minerals - Current policy on onshore gas and oil developments should be modified to take account of the Management of Extractive Waste Regulations as these relate to Council's responsibilities.

**Response:**

Policy IR16 states proposals should be accompanied by a waste management plan, where required, in terms of the Management of Extractive Waste (Scotland) Regulations 2010. This requirement can apply to proposals for extractive process, relating to unconventional oil and gas, under the terms of Policy IR15.

**Comment:**

Waste - Waste policies require to be modified according to current guidance relating to proximity.

**Response:**

Policy IR17 deals with waste management facilities. It states proposals will be assessed against Scottish Planning Policy. This would include requirements for proximity as set out by SPP, if they are material to the consideration of a relevant planning application.

**Comment:**

Comments on current LDP minerals and waste policies: RW02 Mineral Resources - requires that the policy is reviewed in the context of the Scottish Government moratorium on unconventional gas. RW03 Assessment of Mineral Proposals - support the policy but require updates in relation to the Extractive Waste Regulations, and that reference is made to unconventional oil and gas proposals being considered against SPP. RW08 Waste Management - support reference to the Zero Waste Plan but requires/recommends a number of changes to the scope and wording of the policy. RW09 Waste Reduction in New Development - support the policy but recommend some changes including the preparation of SG on waste storage, recycling and collection space. RW10 Vacant, Derelict, Unstable and Contaminated Land - support the policy but recommend changes in relation to contaminated land sites and remediation proposals.

**Response:**

Comments noted and suggested amendments to LDP1 policies incorporated where appropriate into Proposed Plan policies.

No. of comments: 22

**Shieldhill and California Community Council**

00437/FLDP\_MIR/3003/002

LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

If Site 056 (Hillcrest) cannot be delivered as envisioned in LDP1 it should be excluded from LDP2.

**Response:**

The comment is noted. The site is carried forward into LDP2 as an allocated housing site reflecting the recent minded to grant decision.

LDISSUE: LDMI25

**Comment:**

Onshore oil and gas development should be excluded from LDP2 based on the concerns and evidence of harm set out in the PSR Compendium of Evidence and the precautionary principle. Fracking poses a significant threat in terms of pollution, public health, climate and seismic stability, community cohesion and economic vitality. There continue to be concerns about the adequacy of the regulatory regime and the omission of a hydrogeology report in the Scottish Government's research on the topic.

**Response:**

References to onshore and unconventional oil and gas are retained in the plan as while there is a moratorium on granting consents SPP recognises the national benefit of indigenous oil and gas production and sets out development plan requirements for areas covered by Petroleum Exploration and Development Licences.

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No. of comments: 2

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**Ms Marie Short**

02917/FLDP\_MIR/3001/001

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LDISSUE: LDI002

**Comment:**

The vision is interesting.

**Response:**

Comment is noted.

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LDISSUE: LDMI16

**Comment:**

All of the green network opportunities are a priority for my area.

**Response:**

Comment noted.

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LDISSUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Building housing on the fields to the south of Standrigg Road (Site 221) is not supported. Additional traffic generated by the proposed development will cause road safety issues along Standrigg road, particularly at the corner opposite the cricket club and nursery. No provision is made for the extra school children likely to live in the new development. Local doctor and dental surgeries are already at capacity. The field proposed for development has drainage problems which can overflow to affect existing homes on Standrigg Road, new development is likely to exacerbate this problem.

**Response:**

Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. The site is therefore not identified for housing development in the Proposed Plan.

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LDISSUE: LDMI21

**Comment:**

The preferred option for town centres seems sensible.

**Response:**

Support noted.

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LDISUE: LDMI22

**Comment:**

Annual sporting events may boost the growth of tourism in the area. People will travel far to participate in a well organised event in a special place. How about a Helix half marathon or cycling sportif? We've got the basic off-road facilities, turn it into a sought-after tourist attraction.

**Response:**

Comment noted. This is not a matter for the Local Development Plan to address.

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LDISUE: LDMI23

**Comment:**

Long term accountability from developers is needed.

**Response:**

Comment noted.

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No. of comments: 6

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**Mr Angus Smith**

02885/FLDP\_MIR/3001/001

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LDISUE: LDMI19                      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Objects the proposed allocation of land at Crawfield Road, Bo'ness (site 102) for housing as it would have a bad effect on the Bo'mains Meadow Wildlife Reserve owned by Scottish Wildlife Trust.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

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No. of comments: 1

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**Michael & Janice Smith**

02915/FLDP\_MIR/3001/001

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LDISUE: LDMI17

**Comment:**

Falkirk has been growing too fast in many areas for the current infrastructure. The nature of the area has changed dramatically in a few years. Consolidation and improvement is now required.

**Response:**

The Proposed Plan reduces the housing land target, in recognition that the rate of household growth is projected to fall, and also acknowledging that infrastructure is under pressure in many parts of the Council area. The Proposed Plan sets out the key infrastructure projects which are needed to address existing deficiencies and support growth in communities. In addition, developer contributions will continue to play an important role in delivering infrastructure which is required to mitigate the impacts of new development.

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LDISUE: LDMI18

**Comment:**

Remove more of the stalled sites.

**Response:**

Comment noted. An further appraisal of the effectiveness of existing sites has been carried out post MIR and this is reflected in the final list of sites which have been de-allocated in the Proposed Plan.

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LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

The site at Standrigg Road (Site 147) should not be allocated for housing development. There is limited public transport and other local facilities in the area and additional traffic generated by the development would be to the detriment of road safety. Development could have an adverse effect on an adjacent designated woodland and on the semi-rural character of the Wallacestone/ Reddingmuirhead area.

**Response:**

Standrigg Farm (site 147) does not represent a logical extension to the urban area, and has low overall accessibility. There would be potentially significant landscape impacts, due to its topography. Cumulative impacts on the local road network, and other infrastructure were a key consideration in terms of the growth strategy for the Braes in LDP2, with the main areas of growth in the immediate local area continuing to be focused on Maddiston East. The site is therefore not included for development in the Proposed Plan.

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LDISUE: LDMI21

**Comment:**

Completely agree with the principle of Town Centre first. No town centre means no soul and the essence of Falkirk will be lost.

**Response:**

Support noted.

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LDISUE: LDMI22

**Comment:**

Improving Falkirk Town Centre would boost tourism in the area. Keep as much character as possible. Encourage small businesses as tourists tend to like individual, characterful shops, cafes etc.

**Response:**

Comments noted.

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No. of comments: 5

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**Ms Cathie Smythe**

02889/FLDP\_MIR/3001/002

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LDISUE: LDMI17

**Comment:**

Reducing the rate of housing growth is supported.

**Response:**

Support welcomed.

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LDISUE: LDMI18

**Comment:**

Less stalled sites should be removed.

**Response:**

The Council has taken a balanced approach to stalled sites. Those that are making some progress and have a reasonable prospect of delivery in the plan period have been retained. However, those which have little chance of delivery have been discounted from the housing land supply, or de-allocated.

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LDISUE: LDMI19      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Crawfield Road (site 102) seems a sensible expansion area for Bo'ness with good access to the existing road network. The alternative site mentioned at Muirhouses (sites 104. 105) would be huge in terms of impact on the surrounding area and difficulties accessing the road network via Carriden Brae. Retaining some of the existing sites such as the Bo'ness Foreshore is essential, in the hope these can be developed in the future which should aid the regeneration of Bo'ness Town Centre.

**Response:**

Neither the site at Crawfield Road nor the sites at Carriden/Muirhouses have been allocated as housing proposals in the Proposed Plan. A strategy of consolidation is being pursued, with the focus on existing allocated sites. Whilst the potential benefits of the development at Bo'ness Foreshore are acknowledged, the site is not considered likely to be deliverable in the plan period due to constraints, high development costs, low marketability and consequent viability issues. Consequently, it has been de-allocated. It will remain as open space, however, and if market conditions change significantly, redevelopment options could be considered again in the future.

No. of comments: 3

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**SportScotland**

00330/FLDP\_MIR/3002/001

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LDISUE: LDMI15

**Comment:**

Support the proposals for place statements for each settlement. Sporting provision should form part of these.

**Response:**

The idea of an SG on Place Statements is not being taken forward due to possible overlap with local place plans, and potential for creating too many similar types of documents.

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LDISUE: LDMI16

**Comment:**

Preferred option for Falkirk Greenspace is supported. Green network should be flexible in its approach and should not be narrowed down. Proposal to consolidate green infrastructure advice into a single SG is also supported, and should highlight the role of outdoor sports facilities. On open space, the preferred option is supported, on condition that open space policy is amended to align with SPP, as indicated under Issue 9. Clarity is needed on the role of the Open Space Strategy in relation to planning applications. SportScotland would welcome further engagement on the preparation of the pitches strategy. Review of the policy on compensation payments is supported. It must be made clear to prospective developers that compensation may be required following loss of outdoor sports facilities.

**Response:**

Comments noted. Open space policy in the Proposed Plan has been updated to align with Scottish Planning Policy.

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LDISUE: LDMI19      MIR2/DEN      MIR2 Denny and Dunipace Sites

**Comment:**

Flags up that as the last use of the Denny High School site (site 012), was as an outdoor sports facility, redevelopment would be subject to statutory consultation with sportscotland.

**Response:**

Comment noted. The guidance on the Denny HS site in the Proposed Plan indicates that the previous requirement to retain all the playing fields would be re-assessed against Scottish Planning Policy. This is likely to be in the context the Sport Pitch Strategy or a local assessment of provision and usage.

**Comment:**

Site 159 at St Giles' Square may contain a playing pitch. The LDP should make it clear that any proposed loss of a playing pitch should comply with SPP.

**Response:**

Comment noted. The site at St Giles Square is not identified as a proposal in the Proposed Plan.

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**Comment:**

Part of the Grangemouth Road, Falkirk site (site 025) appears to be currently used as sports pitches. Any proposed redevelopment would be subject to the provisions of SPP and consultation with sportscotland. Reference should be made to the impact on the outdoor sports facility in the site details within the LDP.

**Response:**

The playing pitch has been largely removed from the allocated site at Grangemouth Road in the Proposed Plan.

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LDISSUE: LDMI20                      MIR2/FAL      MIR2 Falkirk Sites

**Comment:**

If the Falkirk Gateway were to include sporting facilities, sportscotland would welcome engagement and could offer assistance.

**Response:**

Comment noted.

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LDISSUE: LDMI22

**Comment:**

General approach to tourism is welcomed, and note the wider role which sport and recreation can play in supporting business and employment.

**Response:**

Support welcomed.

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LDISSUE: LDMI23

**Comment:**

Preferred option to include all outdoor sports facilities within the definition of open space is supported. The strategic planning of the distribution of pitches is supported, but this should be part of a wider strategy to ensure that there is an understanding of the requirements of all types of pitches/facilities.

**Response:**

Comment noted.

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No. of comments: 8

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LDISUE: LDMI19                      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

Objects to the proposed allocation of land for housing at Crawfield Road, Bo'ness (site 102). Site is green belt and the focus should be on other approved sites and brownfield areas. Development will result in the removal of green network, rather than the claimed benefits to green network. Two paths to the south of the town will be destroyed. Potential drainage benefits are also challenged; if there are drainage issues on Crawfield Road, these should be addressed by the Council and landowner directly. Notification process is queried.

**Response:**

The site at Crawfield Road has not been allocated as a housing proposal in the Proposed Plan due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

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No. of comments: 1

LDISUE: LDI002

**Comment:**

The vision is a good one for the future.

**Response:**

Supporting comment is welcomed.

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LDISUE: LDMI16

**Comment:**

Carriden Woods in Bo'ness should be a priority.

**Response:**

Carriden Woods are privately owned, and whilst an important part of the green network, they are not considered a priority for action in the Open Space Strategy.

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LDISUE: LDMI18

**Comment:**

Retaining the 'stalled' sites seems essential to avoid developers going for easier sites, rather than those which would enhance the town centre, for example.

**Response:**

Comment noted. The Council has taken a balanced approach to stalled sites. Those that are making some progress and have a reasonable prospect of delivery in the plan period have been retained. However, those which have little chance of delivery have been discounted from the housing land supply, or de-allocated.

**Comment:**

It is important that the Bo'ness Foreshore site (site 63) is retained as a long term development aspiration, as it would help to rejuvenate Bo'ness Town Centre.

**Response:**

Whilst the potential benefits of the development at Bo'ness Foreshore are acknowledged, the site is not considered likely to be deliverable in the plan period due to constraints, high development costs, low marketability and consequent viability issues. Consequently, it has been de-allocated. It will remain as open space, however, and if market conditions change significantly, redevelopment options could be considered again in the future.



LDISUE: LDMI19                      MIR2/BNS      MIR2 Bo'ness Sites

**Comment:**

The Crawfield Road site in Bo'ness and Drum sites seem sensible in terms of logical expansion and connection to existing road network.

**Response:**

The Drum sites have been carried forward into the Proposed Plan. The site at Crawfield Road has not been allocated as a housing proposal due to concerns about the loss of green belt, and the range of landscape and environmental impacts associated with such a large scale housing release.

**Comment:**

Objects to the non-preferred housing sites at Carriden/Muirhouses (sites 104,105). Carriden Brae is a dangerous road with little opportunity to improve. The would a huge impact on the chracter of the area and Carriden Estate which is a beautiful part of the green network. There would be an adverse impact on Muirhouses conservation village.

**Response:**

The site at Carriden/Muirhouses has not been identified as a proposal in the Proposed Plan. This site is not considered to be an appropriate location given significant landscape, ecological, and historic environment impacts, the impact on the character of the village of Muirhouses, low accessibility, and the constrained nature of Carriden Brae as an access to large scale development.

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LDISUE: LDMI22

**Comment:**

Opportunities include bike trails at Kinneil and walks in Carriden Woods linking into the John Muir Way.

**Response:**

Comments noted. Kinneil Estate and the John Muir Way have both been identified as green network opportunities in the Proposed Plan.

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LDISUE: LDMI23

**Comment:**

Improvements to M9 Junctions 3, 4 and 5 should be priorities.

**Response:**

Comment noted. Junction 5 is included in the TIF programme. Improvement of Junctions 3 and 4 are dependent on developer funding.

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No. of comments: 8

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**Stewart Milne Homes**

00371/FLDP\_MIR/3001/002

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LDISUE: LDI002

**Comment:**

Statement about levels of housebuilding showing little sign of returning to pre-recession levels is challenged. House building rates are increasing. Support is given to the objective of facilitating continued population and household growth, which a development at Stacks Farm, Bo'ness would support.

**Response:**

Completion rates in the Falkirk Council area over the last few years have fluctuattaed between 400 and 600, at a level well below those experienced in the years prior to the recession.

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LDISUE: LDMI16

**Comment:**

Development of land at Stacks Farm, Bo'ness (sites 104, 105) would allow the creation of a new green network link between Antonine Wall WHS features to the east and west of Muirhouses.

**Response:**

The site is not included as a proposal in the Proposed Plan. Development of the site is more likely to have a negative effect on the green network in the vicinity of Carriden Estate, and the benefits suggested by the developer are not clear.

LDISUE: LDMI17

**Comment:**

The proposed growth strategy should be revisited and the housing supply target increased accordingly. The proposed flexibility level of 15% is a reduction from LDP1 and should be increased to 20% given the number of constrained sites within the Falkirk Council area.

**Response:**

The housing supply target has been set at 450 houses per annum in the Proposed Plan. This reflects the HNDA and the reduction in the projected rate of household growth from LDP1. The flexibility allowance is set at 14% which is considered reasonable.

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LDISUE: LDMI18

**Comment:**

The 2017 Housing Land Audit should be concluded and agreed with Homes for Scotland to provide an analysis of effectiveness of the existing land supply and to inform the Proposed Plan.

**Response:**

The HLA is a process which goes on in parallel with the preparation of LDP2. The 2016/2017 audit was finalised following consultation with Homes for Scotland and has informed the calculation of the existing land supply in the Proposed Plan.

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LDISUE: LDMI19

**Comment:**

Supports the revision of the alternative sites policy to be used in the event of a shortfall in the 5 year effective land supply whilst reserving the right to make comment on the detailed criteria.

**Response:**

A revised policy on alternative sites has been included in the Proposed Plan.

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**Comment:**

Supports a new Strategic Growth Area to the east of Bo'ness at Carriden/Muirhouses (sites 104, 105), identified as one of the alternative, non-preferred options in the MIR. Land is controlled by Stewart Milne and a development framework is submitted illustrating how the site could be developed, including an initial allocation of 250 units. A number of accompanying assessments have also been prepared covering landscape capacity, ecology, archaeology, transport, access, and site conditions which demonstrate that development can be sensitively accommodated and delivered in the lifetime of the LDP. No insurmountable barriers to development have been identified. The opportunity to add to the green network has also been identified.

**Response:**

The site at Carriden/Muirhouses has not been identified as a proposal in the Proposed Plan. A strategy of consolidation is proposed in Bo'ness, with no further allocations over and above existing commitments. The existing sites which form part of the Bo'ness South East Strategic Growth Area provide for a substantial level of growth in the town over the plan period, and the completion of the Drum development is considered the priority. This site is not considered to be an appropriate location for growth given significant landscape, ecological, and historic environment impacts, the impact on the character of the village of Muirhouses, low accessibility, and the constrained nature of Carriden Brae as an access to large scale development.

LDISUE: LDMI23

**Comment:**

A global infrastructure levy approach to delivery is not supported as it would not comply with Circular 3/2012.

**Response:**

The Council accepts that this approach is likely to require new legislation which is currently being considered through the new Planning Bill.

No. of comments: 7

**Stirling Council**

00617/FLDP\_MIR/3001/002

LDISUE: LDMI16

**Comment:**

Continuing support for the CSGN is welcomed, including the identification and promotion of green network opportunities and corridors that link with the Stirling Council area.

**Response:**

Comment noted.

LDISUE: LDMI19

**Comment:**

Notes that there are no significant additional allocations in proximity to the Stirling Council boundary, so Stirling's planning and environmental interests are unlikely to be adversely affected.

**Response:**

Comment noted.

LDISUE: LDMI24

**Comment:**

Stirling Council notes and welcomes that the SPP based Wind Energy Spatial Framework, as shown on Figure 6.3, aligns with the Stirling Framework.

**Response:**

Support welcomed.

**Mr & Mrs Gordon & Eileen Sutherland**

02875/FLDP\_MIR/3001/001

LDISUE: LDMI23      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Mr and Mrs Sutherland object to the allocation of the cemetery extension at Weedingshall, Polmont (site 194). The proposal would result in a loss of privacy and amenity, and the site has ongoing problems with drainage and compliance with SEPA regulations.

**Response:**

The site forms a logical extension to existing cemetery provision at Grandsable. The use of the site will, however, be restricted by ground conditions, with highly permeable sandy soils, which are unlikely to be suitable for conventional burials in terms of SEPA guidance. The site could be used for related purposes such as cemetery car parking or interment of ashes. A full layout and landscape scheme would be prepared as part of any future planning application, which should aim to protect amenity and privacy. The site is therefore included as an infrastructure allocation in the Proposed Plan, but subject to compliance with SEPA guidelines.

**Isla Sutherland**

00875/FLDP\_MIR/3001/001

LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Objects to the potential development of site at Standrigg Road, Brightons (site 221) for housing.

**Response:**

Standrigg Road (Site 221) site would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. The site is therefore not identified for housing development in the Proposed Plan.

**Mrs Jeanette Sutherland**

02863/FLDP\_MIR/3001/001

LDISUE: LDMI19      MIR2/RURN      MIR2 Rural North Sites

**Comment:**

Seeks the allocation of Dunmore South (site 208) for elderly amenity residential bungalows (29 units). The land is currently rough grazing land. It is an effective housing site and would create a logical extension to the village.

**Response:**

Dunmore South is not identified as a housing proposal in the Proposed Plan. The site is subject to a number of significant environmental constraints, including landscape, historic environment and coastal flooding issues. There are also significant infrastructure constraints including capacity issues in local catchment schools, lack of a sewer network and limited local services.

LDISUE: LDMI19                      MIR2/B&amp;B      MIR2 Bonnybridge and Banknock Sites

**Comment:**

The site at East Bonnybridge (site 77) should be identified as a mixed use allocation as it is a natural extension to the east of Bonnybridge, owners have the site under option and a major national house builder has shown interest.

**Response:**

The site has been carried forward into the Proposed Plan as a mixed use allocation. The gas pipeline constraint is considered to be a major factor constraining the effectiveness of the site, although investigations are ongoing regarding potential solutions.

**Comment:**

Seeks the allocation of a 6 acre site at Torwoodhead (site 216) for housing. The site could contribute to meeting the housing land requirements and there are no known constraints.

**Response:**

The site is not identified as a housing proposal in the Proposed Plan. The isolated site would represent ribbon development along the A9, and involve the loss of prime agricultural land. There are potential ecological impacts associated with the proximity of important woodland habitats, and significant education constraints.

No. of comments: 2

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Taylor Wimpey UK Limited00198/FLDP\_MIR/3003/001

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LDISUE: LDMI15

**Comment:**

Support preferred option to consolidate existing guidance on design. If this is done the first three items in Fig 3.1 do not need to be promoted as they will have been consolidated into the new policy.

**Response:**

Support noted. A new consolidated overarching design policy 'PE01 Placemaking' is included in the Proposed Plan.

**Comment:**

Support for continuing current approach of promoting placemaking through topic based policies set out in Alternative Option in para 3.06. Other Councils ceased doing place statements due to time, resources and benefit derived.

**Response:**

Comment noted. Place Statements are not being taken forward due to concerns about potential overlap and confusion with local place plans which are being proposed through the Planning Bill, and other community planning processes.

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LDISUE: LDMI16**Comment:**

Support a review of the spatial extent of Central Scotland Green Network (CSGN) set out in Alternative Option in 3.16. There is a need for this review at Roughlands (site 130) and Kirkton Farm (sites 127 & 129).

**Response:**

The existing overall extent and scope of the Falkirk green network remains relevant and appropriate, and has been carried forward largely unchanged into the Proposed Plan. The list of detailed opportunities has been updated.

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**Comment:**

The annual housing requirement within the existing LDP is 675 units per annum, whereas the preferred option in the MIR only identifies 552 units per annum. It is not appropriate at a time of market recovery to restrict the annual target to below historical figures. There is concern that the MIR proposed to reduce flexibility allowance from 17% to 15%. Whilst the MIR states that a 'moderate' 15% level is appropriate given the level of uncertainty surrounding larger sites in the supply, this would justify increasing flexibility to 20%.

**Response:**

The Proposed Plan flexibility allowance is 14%. This is still within the range of 10-20% specified in SPP and reflects the Council's decision to allocate a limited number of sites to meet the reduced target of 450/yr. This lower target still meets the projected household needs of the Council area identified in the HNDA as 418/yr so at a minimum this would be 4180 for 2020 – 2030. This is still 25% flexibility from the base HNDA figure.

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**Comment:**

Windfall sites represent a substantial element of the supply, and in light of questions over where this will come from, Taylor Wimpey support the alternative option in the MIR of making no allowance for windfall sites, unless the number can be supported by robust justification in terms of past completions.

**Response:**

The housing figures identified in the Proposed Plan include a windfall figure of 50 units per annum. This is based on an analysis of past trends. Section 8 of Technical Report 3: Housing and Settlement Growth Option explains the approach further.

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**Comment:**

Taylor Wimpey support the preferred option to continue an 'alternative sites' policy. They believe the Council should go further, in order to provide certainty to the development industry about where development may or may not happen in the form of a 'safeguarding/future development site' approach. Where there is a failure in the 5 year supply, these sites could be brought forward. East Lothian and Midlothian have taken this approach.

**Response:**

Comment noted. The Council consider that Proposed Plan Policy HC01 provides adequate support for sites which could assist in addressing a shortfall in the 5 year supply, and which constitute sustainable development, under the terms of SPP.

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**Comment:**

Do not support the preferred or alternative options for housing targets and requirements set out in para 4.07. Suggest a different alternative target of 12,000 homes over 2020-2040, with 6,000 in 2020-30, at an average rate of 600 homes per year.

**Response:**

The revised housing supply target in the Proposed Plan has been set at 450 units per year, with a flexibility allowance of 14%. The reduced target reflects the HNDA and the general reduction in the projected rate of household growth in the area.

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**Comment:**

Increase flexibility level to 20%. It does not seem appropriate at a time of recovery to reduce both the annual target and generosity factor.

**Response:**

The flexibility allowance is 14% in the Proposed Plan. This is within the range of 10-20% specified in SPP and is considered appropriate for the area.

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**Comment:**

Support Alternative option in 4.53 to make no allowance for windfall development, unless the numbers can be supported by robust justification in terms of past completions.

**Response:**

A windfall allowance is permitted by SPP, and reflects the relatively high levels of windfall sites which have historically come forward in the area. The figure of 50 units per year has been justified by an analysis of past trends.

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**Comment:**

Broadly support Alternative Sites policy set out in 4.55, however would like to see Council go further by providing more certainty where development may or may not happen in the future in the event of the 5 year land supply failing.

**Response:**

If a shortfall occurs in the housing land supply Policy HC01 provides the criteria to assess additional sites.

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**Comment:**

Taylor Wimpey seek the inclusion of a site at Middlerigg, Reddingmuirhead (Site 211) for housing. The site is a smaller (approx 200 units), revised site from previous submissions. The site represents a logical extension to the settlement, within an established landscape framework, which will avoid coalescence of Wallacestone and Reddingmuirhead. The proposal will provide enhancement to the Polmont Burn corridor. The site is relatively unconstrained, and is considered deliverable and effective, in an area of known marketability. The site would make a significant contribution to the 5 year housing land supply.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. Reddingmuirhead has been subject to very substantial development over recent years, and LDP1 decided on a strategy of consolidation for this part of the Braes. It is considered appropriate that this strategy remain in place, and that incremental allocations around the fringes of Reddingmuirhead and Wallacestone are not the optimum option for further growth in the Braes. Despite the revised site boundary, the site would still contribute to coalescence of Reddingmuirhead and Wallacestone.

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**Comment:**

Support for housing development at Roughlands Farm (site 130) outlined in option 3 of Alternatives in 4.49. This could be an alternative to Hill of Kinnaird (site 94) rather than changing an existing strategic business allocation to accommodate residential development. Roughlands forms a logical and rounding off to the settlement.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. The site would represent a significant extension of the urban area into the green belt and potential landscape issues. Capacity constraints at Larbert High School means that further significant housing growth in Larbert/Stenhousemuir is not supported

**Comment:**

Support for a new Carronshore Strategic Growth Area involving a large scale green belt release at Kirkton Farm (sites 127 and 129), as set out in Alternative Option 5 in 4.49. A safeguarding for future development is sought in this LDP to enable further work to be carried out.

**Response:**

The sites have not been identified as housing proposals in the Proposed Plan. They would represent a major extension to the urban area of Stenhousemuir/Carronshore into the green belt, with associated significant environmental impacts. There are also significant education and transport constraints.

LDISUE: LDMI20                      MIR2/LAR      MIR2 Larbert and Stenhousemuir Sites

**Comment:**

Retain Hill of Kinnaird 2 (site 094) exclusively for business given its strategic importance and the presence of an alternative site capable of delivery the required number of houses.

**Response:**

Hill of Kinnaird 2 (094) is identified for mixed use (Housing/Business/Community). Assessment has indicated that retention of the site exclusively for business use is not considered appropriate. The site is not as favourably located for business development as other strategic sites in the area such as Glenbervie.

LDISUE: LDMI23

**Comment:**

Support Preferred Option for the delivery and funding of infrastructure set out in 6.19.

**Response:**

Support noted.

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No. of comments: 15

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**The Church of Scotland General Trustees**

00065/FLDP\_MIR/3002/001

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LDISUE: LDMI19                      MIR2/RURN      MIR2 Rural North Sites

**Comment:**

Support for the continued retention of the Glebe 1 (site 042) in Airth for future housing development. It has an expected time frame of 2018/19 for the delivery of 40 units.

**Response:**

Support noted. Housing Site H50 (MIR 042) The Glebe, Airth is carried forward into the Proposed Plan from LDP1.

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No. of comments: 1

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**The Coal Authority**

00213/FLDP\_MIR/3002/001

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LDISUE: LDMI25

**Comment:**

Coal resources should not be sterilised by new development and coal extraction should be carried out prior to such development. Land instability and mining legacy issues should not be seen as a complete constraint on development but highlighting issues allows them to be addressed. Reference should have been made to a review of the areas of search for minerals in LDP. The inclusion of a policy on vacant, derelict, unstable and contaminated land in LDP is welcomed and this should be continued through into LDP2.

**Response:**

Policy IR15 recognises that minerals should not be sterilised by development. There has been no significant change to warrant a review of the areas of search for minerals. The comments in support of the policy on vacant and derelict land are noted.

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No. of comments: 1

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LDISUE: LDMI19

**Comment:**

Transport Scotland (TS) note the scale of new housing proposed and do not have any concerns relating to potential cumulative impact on the trunk road network in the area. TS worked with the Council on the previous plan which identified mitigation measures, many of which are still to be delivered. Nonetheless, a TA is envisaged for any application for the Crawfield Road, Bo'ness site (site 102) which would include assessment of impact on M9 Junction 3.

**Response:**

Comment noted. The Crawfield Road site in Bo'ness has not been allocated as a housing proposal.

LDISUE: LDMI23

**Comment:**

The Council should set out clearly the process for assessing transport impacts when identifying preferred development options for inclusion in the LDP. The Transport Appraisal is noted but it may be useful to include more detailed description of how transport information has informed the preferred strategy options, in line with DPMTAG.

**Response:**

Comments noted. The Transport Appraisal has been subject to review and revision.

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**Comment:**

Transport Scotland does not object to the inclusion of railway station safeguarding at Grangemouth and Bonnybridge, but references should be appropriately caveated, bearing in mind that no Transport Appraisal has been carried out to date. Reference to these should be noted as 'aspirational'. Additional text should be added referring to the nature of the appraisal required, STAG principles, the need for a positive business case, and relevant design and feasibility work.

**Response:**

The text associated with rail station safeguarding has been reviewed and amended taking account of these comments.

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No. of comments: 3

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Mr John Travers02905/FLDP\_MIR/3001/001

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LDISUE: LDI002

**Comment:**

Agrees with the vision. Would like Falkirk to continue to grow economically. Maintaining designated green spaces is central to keeping Falkirk's positive character and environment.

**Response:**

Comment noted.

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LDISUE: LDMI15

**Comment:**

Impacts of new developments on local communities need to be considered, including availability of local amenities, and greenspaces. Local residents and businesses should be fully involved in the planning process.

**Response:**

The Spatial Strategy in the Proposed Plan seeks to ensure that growth is located within areas where existing infrastructure such as roads, schools and green infrastructure can accommodate new development, or where enhancements to existing infrastructure can be deliverable within the plan period.

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LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Objects to potential development of land at Standrigg Road, Brightons (site 221) for housing. Site is a pleasant greenspace which is central to the character of the local community. Pressure will be put on local amenities and roads. Local road network is already too busy and development would lead to further congestion. There have been power outages in the local area and drains flooding.

**Response:**

The site at of Standrigg Road (Site 221) is not allocated as a housing proposal in the Proposed Plan. It would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road.

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LDISUE: LDMI22

**Comment:**

Promote highly rated locally-owned business and eateries at and when promoting tourist sites.

**Response:**

Comment noted. However, the ownership of individual business cannot be influenced by the planning system.

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LDISUE: LDMI24

**Comment:**

Agrees with the preferred options for energy.

**Response:**

Support noted.

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LDISUE: LDMI25

**Comment:**

Disagrees with using coal reserves or onshore gas that have residential properties built on or around them.

**Response:**

In line with Scottish Planing Policy, the Proposed Plan identifies areas suitable for surface coal extraction. The Spatial Strategy in the Proposed Plan also reflects the PEDL (Petroleum Exploration and Development Licence) boundaries. Any proposal would be subject assessment against detailed environmental criteria included within minerals policies IR15 and IR16. The Scottish Government also continues its moratorium on onshore gas extraction.

No. of comments: 6

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**Sandy Trimmer**

00753/FLDP\_MIR/3001/001

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LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Mr Trimmer does not support any allocation for 5 self build units at Irene Terrace, Standburn (site 210). The access presents road safety and visibility issues, particularly in terms of parking for the primary school.

**Response:**

The site is not allocated for development in the Proposed Plan. Development would constitute backland development, and would not be sympathetic to the prevailing settlement pattern. There are also access issues, and the effectiveness of the site is not clear.

No. of comments: 1

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LDISUE: LDMI22

**Comment:**

Pleased to see that the MIR acknowledges the importance of the visitor economy and that tourism is a potential growth area. Tourism focus for the Falkirk Investment Zone is welcomed, as are the preferred options of improving town centre connections and promoting additional tourism opportunities at the Wheel, Wester Carmuir and Kinneil walled garden. Recommends that reference to the National Tourism Development Framework be incorporated into LDP2.

**Response:**

Support welcomed and comments noted.

No. of comments: 1

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**Wallace Land Investments**00001/FLDP\_MIR/3002/002

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LDISUE: LDI002

**Comment:**

No recognition of the role of the Council in ensuring that the LDP will assist the house building industry in delivering the true scale of housing required to meet demand within the Council area. Suitable investment in local infrastructure must be made in strong market areas such as Larbert and Stenhousemuir to support future development. The use of developer contributions can assist the provision of new infrastructure and limit impact on the viability or timing of new development.

**Response:**

The Proposed Plan contains sufficient housing to deliver the area's housing needs as assessed by the HNDA. The plan identifies a range of key infrastructure projects which are needed to address any existing deficiencies and support future growth in LDP2. Policy IR02 on developer contributions sets out policy guidance for infrastructure required specifically to mitigate the impacts of new development.

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LDISUE: LDMI15**Comment:**

Support for retaining existing design policies which remains fit for purpose. The current approach allows applicants and developers to focus on specific issues which are relevant to their proposals, this may be diminished if a single policy is adopted.

**Response:**

The Proposed Plan consolidates the design policies into the overarching Policy PE01 Placemaking. This is considered the best approach which allows developers to readily access the relevant policy guidance.

**Comment:**

Place Statements should be included in the plan rather than supplementary guidance, otherwise they will not be given the same independent assessment through the examination process. Landowners and developers should also be involved in producing them. If place statements are not prepared as an integral part of the plan, the current approach should be maintained.

**Response:**

Comment noted. Place Statements are not being taken forward due to concerns about potential overlap and confusion with local place plans which are being proposed through the Planning Bill, and other community planning processes.

LDISSUE: LDMI17

**Comment:**

Windfall allowance of 500 units over 10 years should be replaced by specific land use allocations over the same period.

**Response:**

A windfall allowance is permitted by SPP, and reflects the relatively high levels of windfall sites which have historically come forward in the area. The figure of 50 units per year has been justified by an analysis of past trends.

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**Comment:**

It is not justifiable for the Council to make a significant decrease in the housing land supply target. Given the uncertainty over the delivery of some of the larger development sites the application of a higher flexibility allowance can be justified. A flexibility allowance of 17% should be applied to LDP2.

**Response:**

The reduction in the housing land target reflects the HNDA, which takes into account projected reductions in the rate of household growth in the area. The HNDA target is 418 units per year, and the Proposed Plan has set the housing supply target at 450 units. The flexibility allowance has been set at 14% which is considered appropriate and within the range required by SPP.

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**Comment:**

Given the tight geographical nature of the Council area there is no justification for the two tier quota system for affordable housing. A single quota requirement of 15% should be applied to all qualifying developments.

**Response:**

The Council continues to adopt a two tier approach to applying its affordable housing requirement. The requirements are set at 15% in lower level areas of need, and 25% in more pressured areas. This reflects real differences in need between the various sub market areas.

LDISSUE: LDMI18

**Comment:**

Support for the de-allocation of stalled sites in the preferred option, on the basis that additional land is brought forward to replace these sites. Also those sites in the alternative option should be de-allocated and replaced by new allocations such as Bensfield. Effectiveness of Bo'ness Foreshore and Whitecross questioned.

**Response:**

Support noted. Bo'ness Foreshore has also been de-allocated in the Proposed Plan, and Whitecross has been significantly reduced in scale to aid deliverability.

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**Comment:**

Effectiveness of Bo'ness Foreshore (site 63) is questionable and it should not be included in the list of Strategic Growth Areas to be carried forward into LDP2.

**Response:**

Bo'ness Foreshore has been de-allocated and has not been carried forward into the Proposed Plan.

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**Comment:**

Effectiveness of Whitecross (site 76) is questionable and it should not be included in the list of Strategic Growth Areas to be carried forward into LDP2.

**Response:**

The vision for Whitecross has been revised in the Proposed Plan. The former Manuel Works which is part of this allocation is redesignated for business / industry use in the Proposed Plan, with a much reduced housing component on land adjacent to the village.

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LDISSUE: LDMI19

**Comment:**

Support for an 'alternative sites' policy as set out in paragraph 4.55 which is necessary to ensure that a minimum five year effective supply of housing land is maintained.

**Response:**

Support noted. The 'alternative sites' provision has been included in Policy HC01 in the Proposed Plan.

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**Comment:**

Seeks the allocation of Bensfield Farm (site 131) for housing (240 units). The delivery would be brought forward in phases with full output achievable in the period to 2024. The site is in single ownership and immediately effective.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. It does not represent a natural rounding off to the urban area and could set a precedent for further incremental incursions into the green belt. Capacity constraints at Larbert High School means significant housing growth in Larbert/Stenhousemuir is not supported.

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|                     |                         |
|---------------------|-------------------------|
| No. of comments: 11 |                         |
| Ms Yvonne Weir      | 02907/FLDP_MIR/3001/001 |

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LDISSUE: LDMI19

**Comment:**

Strongly opposed to any proposals for further housing in Larbert/Stenhousemuir given the current infrastructure constraints and lack of open space within the area.

**Response:**

Larbert and Stenhousemuir is identified as having low growth potential in the period 2030-2040, which reflects infrastructure capacity constraints.

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**Comment:**

Opposed to development at Denny Road (site 132). It would be contrary to the hospital masterplan, would have an adverse impact on the Maggie's Centre and Loch View and there is already considerable housing growth in the area which existing infrastructure is struggling to cope with.

**Response:**

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

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**Comment:**

Opposed to development at Stirling Road (site 133). It would be contrary to the hospital masterplan, would have an adverse impact on the Maggie's Centre and Loch View and there is already considerable housing growth in the area which existing infrastructure is struggling to cope with. It would affect the emergency services access road.

**Response:**

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

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LDISUE: LDMI20                      MIR2/LAR      MIR2 Larbert and Stenhousemuir Sites

**Comment:**

Opposed to further housing at Hill of Kinnaird 2 (site 94). Rather than more housing, consideration should be given to facilities for the community.

**Response:**

Hill of Kinnaird 2 is identified as a mixed use site (housing/business/community) in the Proposed Plan. Housing capacity is dependent on the residual shortfall from the originally approved 1700 house for Kinnaird Village.

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LDISUE: LDMI23

**Comment:**

Investment in schools is needed to cope with the growing population and increased investment in open space and community facilities.

**Response:**

School capacity enhancements Larbert HS and Kinnaird PS are highlighted in the Proposed Plan, and are ongoing. Open space improvement priorities are set out in the Open Space Strategy.

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**Comment:**

A review of the roads network is also required in the Larbert/Stenhousemuir area which is currently not coping at peak times with the flow of traffic.

**Response:**

Comment noted. Transport Assessments are undertaken on a case by case basis to ensure that the transport network can accommodate new development.

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LDISUE: LDMI25

**Comment:**

Agree that the policy on unconventional onshore gas extraction should only be reviewed upon the outcome of the Scottish Government's review.

**Response:**

Comment noted.

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No. of comments: 7

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**Mr David Whitmarsh**

02855/FLDP\_MIR/3001/001

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LDISUE: LDMI19                      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Mr Whitmarsh does not support any development at Standrigg Road 2 (site 221). Local schools experience capacity issues and are under increasing pressure. Standrigg Road is not suitable for increased traffic, in part due to the the bend in the road adjacent to the cricket club. It would also be difficult to widen the road and undertake additional improvements. Drainage is also an issue which should be considered. Development would go against the LDP objective of developing brownfield sites in preference to greenfield sites.

**Response:**

Development of Standrigg Road (Site 221) would represent a substantial extension of the Wallacestone/Rumford urban area, which may create a precedent for further incremental growth along Standrigg Road. Although landscape impacts could potentially be managed, the local transport infrastructure is substandard, and even with improvements, further growth along Standrigg Road is not ideal. Pedestrian accessibility of the site is impacted by the lack of footway along the length of Sunnyside and Standrigg Road. The site is therefore not identified for housing development in the Proposed Plan.

**Mr & Mrs Peter & Elizabeth Williamson**

02929/FLDP\_MIR/3001/001

LDISUE: LDMI19 MIR2/BRS MIR2 Braes and Rural South Sites

**Comment:**

Objects to potential residential development site at Standrigg Road, Wallacestone (site 147). Housing will take up a large area of green belt and adversely impact on wildlife and countryside recreation. Standrigg Road and surrounding area are not built to cope with the huge increase in traffic that will result. Local infrastructure such as schools, GP surgeries, Polmont rail station parking, and electricity supply network cannot support this development. Extensive development in the Braes has been ongoing for some time.

**Response:**

Standrigg Farm (site 147) does not represent a logical extension to the urban area, and has low overall accessibility. There would be potentially significant landscape impacts, due to its topography. Cumulative impacts on the local road network, and other infrastructure were a key consideration in terms of the growth strategy for LDP2, with the main areas of growth continuing to be focused on Maddiston East. The site is therefore not identified for residential development.

**Claud A. Wilson**

02769/FLDP\_MIR/3001/001

LDISUE: LDMI23

**Comment:**

The junction of the A803 with Coneypark must be improved as it is very difficult for those turning westwards from Coneypark to make a right hand turn due to heavy traffic in the morning peak. A new roundabout is suggested.

**Response:**

This has been identified by the Council as a priority issue.

**Mr Edward Wood**

02857/FLDP\_MIR/3001/006

LDISUE: LDI002

**Comment:**

The vision is supported. Provision of a range and choice of deliverable housing sites is fundamental to the issue of population growth and stalled housebuilding. There is also a need to deliver additional nursing home provision.

**Response:**

Comment noted.

LDISUE: LDMI15

**Comment:**

Individual settlement statements as supplementary guidance is supported providing the detail required to support development proposals is in the LDP. A proactive stance should be taken through development frameworks for strategically important sites.

**Response:**

The idea of an SG on Place Statements is not being taken forward due to possible overlap with local place plans, and potential for creating too many similar types of documents.

LDISUE: LDMI17

**Comment:**

The flexibility allowance should be raised to 20% to provide a greater range and choice of housing across the Council area.

**Response:**

The flexibility allowance has been set at 14%, which is considered reasonable and appropriate, and is within the SPP's required range of 10-20%

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LDISUE: LDMI18

**Comment:**

The approach to deallocating certain stalled sites, and the redistribution of proposed housing to other more deliverable sites, is supported.

**Response:**

Comment noted.

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LDISUE: LDMI19                      MIR2/FAL      MIR2 Falkirk Sites

**Comment:**

Scrapyard at Glen Works, to the south of Glen Village, should be allocated for 120 residential dwellings and a 60 bed nursing home. D Morton Demolition has relocated so the site is a vacant brownfield site which would be a sustainable location for new housing. It is well located in relation to public transport and local facilities, and infrastructure is available. Redevelopment of this degraded site would provide net environmental benefit. The site meets the criteria for effectiveness.

**Response:**

The site at Glen Works, Falkirk has not been identified as a proposal in the Proposed Plan. Although site is brownfield and reasonably well screened, it is detached from the urban area and has low accessibility to local services. Access is problematic from a safety point of view and road network in the immediately vicinity is poor. There are concerns about effectiveness, with uncertainty about viability and the extant waste management licence being key unresolved issues.

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LDISUE: LDMI20

**Comment:**

The identification of land south of Glen Village for a nursing home would provide additional local employment.

**Response:**

The site at Glen Works, Falkirk has not been identified as proposal in the Proposed Plan. Although brownfield, it is detached from the urban area and has low accessibility to local services. Access is problematic from a safety point of view and the road network in the immediate vicinity is poor. There are concerns about effectiveness, with uncertainty about viability and the extant waste management licence being key unresolved issues. There is no specific evidence of operator interest in the development of a nursing home in this location.

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LDISUE: LDMI23

**Comment:**

The approach to infrastructure delivery is supported, provided developer contributions are in line with Circular 3/2012.

**Response:**

Support welcomed.

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LDISUE: LDMI16

**Comment:**

The prominence given to green networks in the MIR is welcomed, as is the proposal to consolidate supplementary guidance on green infrastructure. The Forestry and Woodland Strategy, and the intention to embed the guidance into LDP2, is also welcomed.

**Response:**

Support welcomed.

LDISUE: LDMI19

**Comment:**

Development on, or in close proximity to, ancient woodland sites is opposed. The importance of ancient woodland is highlighted in SPP. Development impacts on ancient woodland are outlined including chemical effects, disturbance, colonisation by non-native plants, and cumulative impacts. A list of sites where ancient woodland would be affected is provided, with commentary, including Crawfield Road, Bo'ness (site 102); Parkhall North (East) (site 142); Parkhall North (sites 141); sites which are part of the Denny South East SGA (sites 12, 13, 14, 67); Woodend Farm 1 and 2, Falkirk (sites 160, 161); and Airth sites (39 and 41).

**Response:**

Comments on individual sites are noted. The Proposed Plan includes a policy which presumes against loss of ancient woodland. In respect of key individual sites, guidance on retention of the existing woodland resource is also provided.

No. of comments: 2

**Mr & Mrs Jamie & Nicola Young**

02870/FLDP\_MIR/3001/001

LDISUE: LDMI19      MIR2/BRS      MIR2 Braes and Rural South Sites

**Comment:**

Mr and Mrs Young do not wish to see development at a site at Irene Terrace (Site 210) for 5 self-build plots. The site is agricultural land, and also has ecological value. The site access has poor road visibility, and is opposite the school entrance which would create road safety problems. The existing site at Standburn West (site 60) represents the communities preferred area of growth for the village.

**Response:**

Irene Terrace (Site 210) is not identified as a housing proposal in the Proposed Plan. The Proposed Plan retains LDP1's housing land allocation of Standburn West (Site 60).

No. of comments: 1

**Mr Robert Alistair Young**

02192/FLDP\_MIR/3003/002

LDISUE: LDMI17

**Comment:**

The preferred option of applying a 15% flexibility allowance is not supported. The application of this lower flexibility allowance has not been fully justified. A more generous level of 20% is supported.

**Response:**

The flexibility allowance is 14% in the Proposed Plan. This is within the range of 10-20% specified in SPP and is considered appropriate for the area.

**Comment:**

Questions the effectiveness of the remaining stalled sites in Figure 4.3 and whether they should still be allocated as part of the housing land supply. MIR does not provide any detail on what period these sites will be 'reprogrammed'.

**Response:**

A further review of site effectiveness has been carried out and is reflected in the Proposed Plan.

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LDISSUE: LDMI19

**Comment:**

The preferred option for Rural North is not supported. Deliverability and effectiveness of two sites in Torwood (McLaren Park and Torwood School) is questioned as neither site has commenced construction. It is submitted that sites at Castle Crescent Torwood and East of Letham Cottages are effective and can contribute to the housing land supply for 2020-30. Alternative Options 3 and 4 for Rural North are therefore supported.

**Response:**

The alternative options 3 and 4 for Rural North are not supported in the Proposed Plan. Castle Crescent has not been identified as a housing proposal, given the lack of local facilities and poor accessibility to other services, as well as education constraint. East of Letham Cottages has not been identified as a housing proposal, due to impact on the setting of the Conservation Area and the wider landscape, and similar to Torwood the village has a lack of local facilities and poor accessibility to other services.

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**Comment:**

Promotes housing site located to the north west of Castle Crescent in Torwood (site 154). The site is 3.5ha and could accommodate 40-60 units with a mixture of housing tenures including affordable. It is an effective site which could contribute towards the housing land supply. The site could be developed in the first phase of the plan 2020-2025.

**Response:**

The site has not been identified as a housing proposal in the Proposed Plan. Given the lack of local facilities and poor accessibility to other services, significant housing growth in Torwood is not favoured. Education constraints are also significant.

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**Comment:**

Promotes land at Letham East (Site 155) for housing development. The site comprises 2ha of agricultural land. The site could be developed for housing during the first period of the plan 2020-25.

**Response:**

Letham East is not identified as a housing proposal in the Proposed Plan. The site would impact on the setting of Letham Conservation area and the wider landscape, there is a lack of local services and poor accessibility to other services, and the effectiveness of the site is uncertain.

No. of comments: 5

No. of comments: 840