

**LDISSUE: LDMI18****Existing Housing Land Supply**Name: **John**

02904/FLDP\_MIR/3001/004

**Comment:**

More stalled sites should be removed from the plan.

**Response:**

Comment noted.

Comments 1

Name: **Mark Agnew**

00835/FLDP\_MIR/3001/001

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.

Comments 1

Name: **Airth Parish Community Council**

00189/FLDP\_MIR/3001/010

MIR2 Rural North Sites

**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.

**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.

**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.

**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.

**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.

**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:**

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:**

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:**

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 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.

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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.

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Comments 1

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Name: **Ms Carol-Ann Anderson**

02888/FLDP\_MIR/3001/003

**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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Comments 1

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Name: **Mr Ian Angus-Felton**

02902/FLDP\_MIR/3001/005

**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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Comments 1

Name: <b>Ruth Arnott</b>	00964/FLDP_MIR/3001/002
<b>Comment:</b> All stalled sites should be removed.	
<b>Response:</b> Comment noted.	
Comments 1	
Name: <b>AWG Property</b>	00906/FLDP_MIR/3002/003
<b>Comment:</b> 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.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>Blackness Area Community Council</b>	00054/FLDP_MIR/3001/003
<b>Comment:</b> It is better to be realistic and remove all the stalled sites.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>Brightons Community Council</b>	00123/FLDP_MIR/3002/004
<b>Comment:</b> 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.	
<b>Response:</b> 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.	
MIR2 Braes and Rural South Sites	
<b>Comment:</b> 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.	
<b>Response:</b> 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.	
<b>Comment:</b> The proposed Whitecross development (site 76) should incorporate a train station as existing stations/parking are unlikely to service growth.	
<b>Response:</b> 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.	
Comments 3	

## 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.

**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.

## MIR2 Braes and Rural South Sites

**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.

## MIR2 Denny and Dunipace Sites

**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.

## MIR2 Falkirk Sites

**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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Comments 5**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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Comments 1

Name: <b>Mr Gordon Cook</b>	00890/FLDP_MIR/3001/002
<b>Comment:</b> Planning should be given on the basis that the development commences within a reasonable timescale or the sites will have planning consent removed altogether.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>Craigrossie Properties</b>	00904/FLDP_MIR/3002/004
<b>Comment:</b> 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, Haggs and selected sites in Rural South villages. These sites should be replaced with other effective sites to meet the housing land requirements.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>Mr Douglas Dewar</b>	02893/FLDP_MIR/3001/004
<b>Comment:</b> More of the stalled sites should be removed.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>Susan Dyer</b>	00469/FLDP_MIR/3001/005
<b>Comment:</b> What is the point of using time and resources on housing sites which have stalled?	
<b>Response:</b> Comment noted.	
Comments 1	
Name: <b>Mr Tim Flett</b>	02909/FLDP_MIR/3001/003
MIR2 Bo'ness Sites	
<b>Comment:</b> Support alternative outlined in paragraph 4.16 and de-allocation of Bo'ness Foreshore (site 63).	
<b>Response:</b> Support noted. Bo'ness Foreshore (site 63) has been de-allocated in the Proposed Plan.	
MIR2 Braes and Rural South Sites	
<b>Comment:</b> Support alternative outlined in paragraph 4.16 and de-allocation of Whitecross (site 76).	
<b>Response:</b> The Whitecross proposal (site 76) ihas 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).	
Comments 2	

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Name: **Ms Jennifer Forsyth**

02903/FLDP\_MIR/3001/005

**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.

Comments 1

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Name: **Forth Valley College**

00592/FLDP\_MIR/3001/001

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.

Comments 1

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Name: **Frank and Birgitta Fortune**

00907/FLDP\_MIR/3001/004

**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.

Comments 1

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Name: **Garthill Developments Limited**

02710/FLDP\_MIR/3002/003

**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.

Comments 1

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Name: **Historic Environment Scotland**

02656/FLDP\_MIR/3001/037

**Comment:**

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

**Response:**

Comment noted.

Comments 1

Name: <b>Homes For Scotland</b>	00284/FLDP_MIR/3002/003
<b>Comment:</b> 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.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>Mr Roddy Htet-Khin</b>	00803/FLDP_MIR/3001/005
<b>Comment:</b> More stalled sites should be removed, but don't add any new sites, especially in countryside locations.	
<b>Response:</b> Comment noted.	
Comments 1	
Name: <b>Mr Douglas Jardine</b>	02894/FLDP_MIR/3001/005
<b>Comment:</b> Consideration should be given to removing all stalled sites.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>Lorna King</b>	00846/FLDP_MIR/3001/006
<b>Comment:</b> 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 of 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.	
<b>Response:</b> Comment noted.	
Comments 1	
Name: <b>Larbert Stenhousemuir and Torwood Community Council</b>	00432/FLDP_MIR/3001/006
<b>Comment:</b> 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.	
<b>Response:</b> 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.	
MIR2 Larbert and Stenhousemuir Sites	
<b>Comment:</b> 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).	
<b>Response:</b> These sites have not been identified as housing proposals in the Proposed Plan.	

**Comment:**

No development should be allowed on Stirling Road (site 133). Any building would be intrusive for the Maggie's 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.

**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.

**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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Comments 5

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Name: **Ms Elaine Mackie**

02895/FLDP\_MIR/3001/004

**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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Comments 1

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Name: **Manor Forrest Ltd**

00455/FLDP\_MIR/3003/007

**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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MIR2 Bo'ness Sites

**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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Comments 2

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Name: **Mr Gordon McKean**

02900/FLDP\_MIR/3001/003

**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.

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Comments 1



Name: <b>Ms Louise Meikleham</b>	02920/FLDP_MIR/3001/005
<b>Comment:</b> More stalled sites should be removed.	
<b>Response:</b> Comment noted.	
Comments 1	
Name: <b>Miller Homes</b>	02869/FLDP_MIR/3001/004
<b>Comment:</b> 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.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>MLFP</b>	02916/FLDP_MIR/3001/004
<b>Comment:</b> 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 there 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.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>Mr Stuart Moss</b>	02726/FLDP_MIR/3001/005
<b>Comment:</b> An adequate amount of stalled sites have been removed	
<b>Response:</b> Comment noted.	
Comments 1	
Name: <b>Ogilvie Homes Ltd</b>	00614/FLDP_MIR/3004/009
<b>Comment:</b> 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.	
<b>Response:</b> 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.	

**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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Comments 2

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Name: **Paradigm Asset Management Group Ltd**

02876/FLDP\_MIR/3001/003

**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.

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Comments 1

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Name: **Persimmon Homes (East Scotland) Ltd**

00712/FLDP\_MIR/3005/004

**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.

**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.

**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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Comments 3

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Name: **Mr Peter Robinson**

02913/FLDP\_MIR/3001/003

**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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Comments 1

Name: <b>Michael &amp; Janice Smith</b>	02915/FLDP_MIR/3001/002
<b>Comment:</b> Remove more of the stalled sites.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>Ms Cathie Smythe</b>	02889/FLDP_MIR/3001/003
<b>Comment:</b> Less stalled sites should be removed.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>Ms Fiona Stewart</b>	02897/FLDP_MIR/3001/003
<b>Comment:</b> Retaining the 'stalled' sites seems essential to avoid developers going for easier sites, rather than those which would enhance the town centre, for example.	
<b>Response:</b> 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.	
MIR2 Bo'ness Sites	
<b>Comment:</b> 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.	
<b>Response:</b> 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.	
Comments 2	
Name: <b>Stewart Milne Homes</b>	00371/FLDP_MIR/3001/005
<b>Comment:</b> 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.	
<b>Response:</b> 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.	
Comments 1	
Name: <b>Wallace Land Investments</b>	00001/FLDP_MIR/3002/008
<b>Comment:</b> 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.	
<b>Response:</b> 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.	

MIR2 Bo'ness Sites

**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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MIR2 Braes and Rural South Sites

**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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Comments 3

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Name: **Mr Edward Wood**

02857/FLDP\_MIR/3001/004

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**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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Comments 1

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Total no. of comments 71