LDISSUE: LDMI23 Infrastructure

Name: **John** 02904/FLDP\_MIR/3001/002

#### 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.

Comments 1

Name: **Mr Ian Angus-Felton** 02902/FLDP\_MIR/3001/009

## 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.

Comments 1

Name: Ruth Arnott 00964/FLDP MIR/3001/005

#### 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.

Comments 1

Name: **Mr James Ashe** 02761/FLDP\_MIR/3001/012

## 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.

Comments 1

Name: Mr Campbell Boyd 02483/FLDP\_MIR/3001/008

## 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 is 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.

Comments 1

Name: **M Bremner** 02919/FLDP\_MIR/3001/006

## 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.

Name: Callendar Pharmacy 02887/FLDP\_MIR/3001/008

#### 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

Comments 1

Name: Chemical Cluster Companies

00878/FLDP MIR/3002/003

#### Comment:

The Grangemouth Station safeguarding is not objected to in principle but assurances are sought that it will not predudice 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 Earlsgate Park is retained to reflect the potential need to address surface water drainage.

Comments 1

Name: Ms Kate Christie 02922/FLDP MIR/3001/010

### 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.

Comments 1

Name: Ms Susan Crook 02911/FLDP\_MIR/3001/005

## 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.

Comments 1

Name: Ms Sinead Currie 02779/FLDP\_MIR/3001/007

# Comment:

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

## Response:

Comment noted.

## 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.

Name: Mr Douglas Dewar 02893/FLDP\_MIR/3001/009

#### 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.

Comments 1

Name: Falkirk Community Trust

01077/FLDP MIR/3001/001

### Comment:

FCT 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.

Comments 1

Name: Falkirk Towns Ltd

00605/FLDP\_MIR/3001/007

#### 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.

Comments 1

Name: Ms Jennifer Forsyth

02903/FLDP\_MIR/3001/010

## 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.

Comments 1

Name: Forth Ports Limited

00020/FLDP\_MIR/3002/003

# 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.

Comments 1

Name: Frank and Birgitta Fortune

00907/FLDP\_MIR/3001/009

## Comment:

Agrees with the focus on new paths and cycle routes.

## Response:

Support noted.

Name: Ms Donna Gillooly 01184/FLDP\_MIR/3001/002

#### 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.

Comments 1

Name: Grangemouth (including Skinflats) Community Council

02723/FLDP\_MIR/3001/009

## 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 minimse 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.

Comments 1

Name: Ms Sandra Hallows

00888/FLDP\_MIR/3001/009

#### Comment:

Agree with the preferred options for infrastructure.

## Response:

Support noted.

Comments 1

Name: Historic Environment Scotland

02656/FLDP\_MIR/3001/041

## 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.

Comments 1

Name: Homes For Scotland

00284/FLDP\_MIR/3002/005

## 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.

Comments 1

Name: Mr Roddy Htet-Khin

00803/FLDP\_MIR/3001/011

## Comment:

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

## Response:

Comment noted.

Name: Lorna King 00846/FLDP\_MIR/3001/012

#### 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.

Comments 1

Name: Larbert Stenhousemuir and Torwood Community Council

00432/FLDP\_MIR/3001/015

### Comment:

There are no areas identified for windfarm development in the Larbert and Stenhousmuir 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.

#### 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.

Comments 2

Name: Ms Elaine Mackie

02895/FLDP\_MIR/3001/009

### 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.

Comments 1

Name: Maddiston Community Council

00323/FLDP\_MIR/3001/007

## 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 accompanised by a Transport Assessment which will assess impact on the local road network, and determine required mitigation.

## Comment:

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

## Response:

Support noted.

Name: Manor Forrest Ltd 00455/FLDP\_MIR/3004/001

### 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.

Comments 1

Name: Ms Louise Meikleham 02920/FLDP\_MIR/3001/010

#### Comment:

New paths and outdoor facilities at reasonable prices for the locals is extremely important

### Response:

Comment noted.

Comments 1

Name: Miller Homes 02869/FLDP\_MIR/3001/005

### 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.

Comments 1

Name: Ms Alison Mitchell 02884/FLDP\_MIR/3001/006

## Comment:

There are a lot of potholes in the local roads.

## Response:

Comment noted. Maintainence of the local road network falls outwith the remit of the planning system. Specific concerns should be directed to the Roads Maintainence teams.

Comments 1

Name: **MLFP** 02916/FLDP\_MIR/3001/005

# 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 shoud 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 wwithin 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

Comments 1

Name: Mr Stuart Moss 02726/FLDP\_MIR/3001/009

## Comment:

Use outdoor greenspace better

# Response:

Comments noted

Name: Muirhouses Amenities Association 00691/FLDP\_MIR/3001/004

#### 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

Comments 1

Name: Network Rail 00493/FLDP\_MIR/3001/002

### 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 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.

Comments 1

Name: NHS Forth Valley (NHS Board) 00522/FLDP\_MIR/3001/004

### 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.

Comments 1

Name: Ogilvie Homes Ltd 00614/FLDP\_MIR/3004/010

## 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 requirments 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.

Comments 1

Name: Paths For All Partnership 00359/FLDP\_MIR/3001/008

## 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.

Name: Persimmon Homes (East Scotland) Ltd

00712/FLDP\_MIR/3005/006

#### 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.

#### 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.

Comments 2

Name: Jules Robinson 02906/FLDP\_MIR/3001/007

#### 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.

Comments 1

Name: Mr Peter Robinson 02913/FLDP\_MIR/3001/001

## 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.

Comments 1

Name: Ms Kathryn Rosevear

02921/FLDP\_MIR/3001/008

## 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.

Comments 1

Name: **RSPB** 00977/FLDP\_MIR/3001/003

# 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.

Name: Scottish Canals 00516/FLDP\_MIR/3001/005

#### 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.

Comments 1

Name: Scottish Natural Heritage

00646/FLDP\_MIR/3002/009

#### 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'.

#### 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.

Comments 2

Name: Scottish Water 00466/FLDP\_MIR/3001/001

## 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.

Comments 1

Name: SEPA (East Region) 00532/FLDP\_MIR/3002/001

## Comment:

Comments are made on current LDP infrastructure policies:INF01 Strategic Infrastructure - recommend that the policy cross references placemaking, air quality and NPF3INF02 Developer Contributions - support policy but require a minor change to the textINF08-10 Transport - recommend cross referencing to placemaking and air quality, but otherwise support the policiesINF12 Water ad 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.

## 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.

Comment: MIR2 Braes

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.

Comment: MIR2 Braes

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.

Comment: MIR2 Denny

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.

Comment: MIR2 Falkirk

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.

Comments 6

Name: Ms Marie Short 02917/FLDP\_MIR/3001/006

## Comment:

Long term accountability from developers is needed.

## Response:

Comment noted

Comments 1

Name: SportScotland 00330/FLDP\_MIR/3002/005

## 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

Name: Ms Fiona Stewart 02897/FLDP\_MIR/3001/008

#### 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.

Comments 1

Name: Stewart Milne Homes 00371/FLDP\_MIR/3001/007

## 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.

Comments 1

Name: Mr & Mrs Gordon & Eileen Sutherland 02875/FLDP MIR/3001/001

Comment: MIR2 Braes

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.

Comments 1

Name: Taylor Wimpey UK Limited 00198/FLDP\_MIR/3003/011

## Comment:

Support Preferred Option for the delivery and funding of infrastructure set out in 6.19.

# Response:

Support noted.

Comments 1

Name: Transport Scotland 00334/FLDP\_MIR/3001/003

# 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 postive 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.

## 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.

Name: **Ms Yvonne Weir** 02907/FLDP\_MIR/3001/006

### 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.

## 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.

Comments 2

Name: Claud A. Wilson 02769/FLDP\_MIR/3001/001

# 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 morining peak. A new roundabout is suggested.

#### Response

This has been identified by the Council as a priority issue.

Comments 1

Name: Mr Edward Wood 02857/FLDP\_MIR/3001/005

### Comment:

The approach to infrastructure delivery is supported, provided developer conmtributions are in line with Circular 3/2012.

## Response:

Support welcomed.

Comments 1

Total no. of comments

69