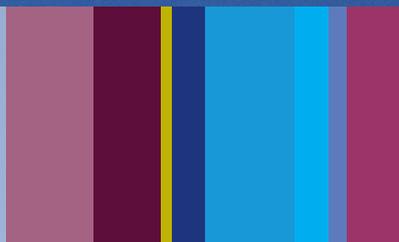




Stirling Council  
Stirling Local Development Plan:  
Summary of Main Issues Report Representations  
June 2016



## Summary of representations made to the Main Issues Report and Stirling Council response – June 2016

In June 2015, Stirling Council agreed to publish a Main Issues Report, the first consultation stage in preparing an updated Local Development Plan. Consultation on the Main Issues Report took place over 10 weeks from 3rd August to 9th October 2015 during which time views and comments on the issues and proposals set out in the Main Issues Report, including additional housing allocations options, were invited.

In response to the Main Issues Report consultation, 422 individuals, businesses or organisations made representations, raising over 950 issues. These representations have been grouped together under 115 headings and this documents summarises all the representations received alongside the Council's response to the issues raised.

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Ref.	1	AIRTHREY KERSE (STR09)
<b>Representations by:</b>		
01678 – Mr and Mrs Craig		01507 – Kirsty Watson
01663 – David Parkinson		SLDP_934 – Margaret Edwards
01662 – Kate Fuller		01525 – Anne McInnes
01522 – Iain Jamieson		01528 – Annie McIntosh
01498 – Donato Tedesco		SLDP_1307 – Joan Keen
00254 – Sian Gordon		01184 – Mrs and Mr McCreath
SLDP_151 – Network Rail		01529 – Fiona Taylor
SLDP_1109 – Michael Burt		01531 – Holger Nehring
01667 – Laura Currie		SLDP_1012 – Gillian Allison
01660 – Jean Hutton		01039 – Cycle Stirling
01661 – Jon Cape		SLDP_324 – University Of Stirling
01673 – Craig Anderson		00216 – Vanessa Jones
01604 – Craig Miller		01610 – June Edmond
01602 – Stephanie Miller		01608 – Antony Pilkington
01595 – Joanne O Cinneide		01603 – Liliias McDonald
SLDP_346 – MacTaggart and Mickel		01047 – Iain Graham
01247 – Andrew McCormack Snr		01596 – Thelma Barron
01560 – Jamie McCormack		01588 – Alan Christie
01561 – Andrew McCormack Jnr		01585 – Keith Robb
01562 – Jeanette McCormack		01123 – Joyce Carberry
01563 – Lee McCormack		01580 – David Philp
00016 – Malcolm Hector		SLDP_1398 – Philip Leeks
01554 – Scott Urquhart		01569 – Tracy Dick
00029 – Gareth Bryan-Jones		01573 – Emma Cavanagh
00168 – Claire Gent and Stephen Hunter		01572 – Graham Meikle
01552 – Iain Jamieson		SLDP_327 – Graham's The Family Dairy
01140 – Linda Galloway		01535 – Carol Bretenoux
01551 – Kathryn Anderson		01549 – Louise McLeod
00994 – Dr Kevin H. Lynch and Dr Jennifer Lynch		01548 – Linzi Bryce
01076 – Niels Hvass		01547 – Jacqueline and Alistair Edmiston
00013 – Joan and John Hvass		01574 – Douglas and Christine McFadzean
01260 – Alison Little		01578 – Chris Waring
00105 – Dr Ian Grieve		SLDP_126 – Scottish Water
01487 – Mr & Mrs R.L. Myles		00711 - SNP
01490 – Aileen Penny		01613 – Historic Environment Scotland
01482 – Sarah Wilkie		01650 – Helen Cormack
01256 – Mrs Valerie Sinclair		01647 – H. Willis
01243 – Anna Hvass		00657 – Gary Thomas
SLDP_867 – Kevin Swingler		01645 – Fiona Bell
00676 – Fiona MacLeod		01643 – Steven MacLean
SLDP_941 – Archie Lafferty		01642 – Tanja MacLean
01471 – Christopher Campbell		01659 – Chelsea Walker
01470 – Kieran Penny		01621 – Meg Jackson
01098 – Steven Hamilton		01622 – Erin Mason
SLDP_1218 – Linda Hamilton		01623 – Rachel Fitzpatrick
00430 – James Weldon		01624 – Rebecca Carmichael
SLDP_932 – Catherine Lafferty		01625 – Jasmine Hunter
SLDP_1375 – William McLellan		01626 – Lana Crow
01265 – Sarah McLellan		01628 – Ami Thomson
01466 – Mrs M Campbell		01629 – Rhys Williamson
		01630 – Lewis Goldie

SLDP_80 – Causewayhead Community Council 00654 – Mrs Elizabeth Huntly 01448 – C R J Sugden 01447 – Robert Beveridge 00047 – Mrs M Morgan SLDP_183 – Stirling Civic Trust 00475 – Robert McOwan 00260 – Kenneth and Doreen Ferguson SLDP_1384 – Duncan McDougall 01499 – Joanna Tedesco 00010 – William Marshall 01495 – Robert and Catherine Forsyth 00177 – Leslie Fisher 01502 – Isabel Steel 00017 – Julia Hector SLDP_33 – SNH	01627 – Jgorg Jvonovo 01634 – Courtney Laurel 01635 – Beth Leaver 01636 – Mille MacRae 01637 – Flemming M'Ratu 01651 – Marc Wilkie 01652 – Jake Gilmour 01653 – Alasdair Johnston 01655 – Emily Gray 01656 – Laura Turner 01680 – Tracy Jamieson 00052 – Ian Rennie SLDP_175 – SEPA 00140 – Stewart Hartfield 00308 – Jill Burt	
	<b>Total No.</b>	132

### Summary of Comments:

#### Identification of the site in the MIR

The majority of respondents did not agree with the sites identification in Option 2 and Option 3 for Housing Land in the MIR.

Mrs Valerie Sinclair (01256), Kevin Swingler (SLDP\_867), Christopher Campbell (01471), Anne McInnes (01525), Joan Keen (SLDP\_1307), Graham Meikle (01572), Robert McOwan (00475), Ian Rennie (00052), Anna Hvass (01243), Sian Gordon (00254), Michael Burt (SLDP\_1109)

Question the sites inclusion in the MIR, citing the reporter's decision at the examination of the current LDP.

Joan Keen (SLDP\_1307), Gary Thomas (00657), Fiona Bell (01645), Kenneth and Doreen Ferguson (00260), Linda Galloway (01140), Anna Hvass (01243), Michael Burt (SLDP\_1109)

Site is contrary to the current LDP.

Vanessa Jones (00216), Gary Thomas (00657), Fiona Bell (01645), Anna Hvass (01243), Joan and John Hvass (00013)

Concerned that previous comments are getting ignored.

June Edmonds (01610), Robert McOwan (00475), Ian Rennie (00052), Malcom Hector (00016), Dr Ian Grieve (00105)

States that previous applications on the site have been rejected and questions why further applications are allowed.

Emma Cavanagh (01573), Mr and Mrs R.L. Myles (01487)

Considers the Scottish Government has pledged not to build on this site.

Causewayhead Community Council (SLDP\_80), Anna Hvass (01243), Niels Hvass (01076), Alison Little (01260)

Draws attention to the reporter's decision which stated that this site should not be made available for any development.

Ian Rennie (00052), Anna Hvass (01243)

Considers that the Reporters decision to exclude the site from the current LDP needs to be taken into account and that the Scottish Governments requirement to identify additional housing land does not mitigate the reasons for which it was removed.

Linda Galloway (01140)

Quotes Primary Policy 2 of the LDP regarding land supply in the event of a shortfall and questions if such a shortfall has arisen.

Linda Galloway (01140)

Considers that nothing has changed in regard to the site, except the threat of legal challenge from the landowners.

MacTaggart and Mickel (SLDP\_346)

Consider that the site can deliver a strategic and sustainable settlement extension to the north of Stirling.

University Of Stirling (SLDP\_324)

Do not raise any specific objections to the principle of development.

Craig Anderson (01673)

Supports development of this site as it is in line with the LDP Vision and Spatial Strategy

Alan Christie (01588)

Supports development on this site as it meets the majority of the required housing. It is an attractive site and well located. Considers that the site options are robust enough that they could stand up under appeal.

Graham's The Family Dairy (SLDP\_327)

Agree with the principles underpinning the assessment of the site, although note that the process of the application has resulted in a more detailed understanding of the sites capacity to support development. Submit that this should be reflected in the proposed plan. Consider that STR11 can only come forward as part of the wider STR09 proposed allocation and this is reflected in the application submitted.

SNP (00711)

Considers that the community believes this site is not going ahead and there is ignorance within the community as to its inclusion in the MIR. Concerned that a large part of the community is oblivious to its inclusion, despite public meetings and attempts by the Community Council to make residents aware.

Duncan McDougall (SLDP\_1384)

Considers that the identification of the site is flawed and does not agree with the core area approach identified in the LDP. Considers the site assessment ignores comments from Scottish Water, SNH and the Scottish Government reporter. Questions the professional capacity of those dealing with the MIR.

Sarah Wilkie (01482)

Hopes that previous comments expressed by the community councils, the general public, SEPA, and the reporter will be taken into account when considering this development.

#### Neighbour Notification

Niels Hvass (01076), John and Joan Hvass (00013), Christopher Campbell (01471)

Questions why only those who were geographically close to the site were notified about its inclusion as an option in the MIR.

Anna Hvass (01243)

Considers the communication methods regarding the MIR to be unacceptable. States that only social media was used to communicate the sites inclusion in the MIR and that other methods, such as letters and posters on local buses and in local libraries should have been used.

#### Flooding

Mr and Mrs Craig (01678), Davis Parkinson (01663), Kate Fuller (01662), Iain Jamieson (01552), Sian Gordon (00254), Jean Hutton (01660), Jon Cape (01661), Craig Miller (01604), Stephanie Miller (01602), Malcolm Hector (00016), Scott Urquhart (01554), Gareth Bryan-Jones (00029), Claire Gent and Stephen Hunter (00168), Kathryn Anderson (01551), Dr Kevin H. Lynch and Jennifer Lynch (00994), Niels Hvass (01076), Joan and John Hvass (00013), Dr Ian Grieve (00105), Mrs Valerie Sinclair (01256), Kevin Swingler (SLDP\_867), Fiona MacLeod (00676), Archie Lafferty (SLDP\_941), Margaret Edwards (SLDP\_934), Joan Keen (SLDP\_1307), Mrs and Mr McCreath (01184), Fiona Taylor (01529), Holger Nehring (01531), Antony Pilkington (01608), Liliias McDonald (01603), Thelma Barron (01596), Keith Robb (01585), Joyce Carberry (01123), David Philp (01580), Phillip Leeks (SLDP\_1398), Louise McLeod (01549), Jacqueline and Alistair Edmiston (01547), Chris Waring (01578), Helen Cormack (01650), Gary Thomas (00657), Julia Hector (00017), Kirsty Watson (01507), Tracy Jamieson (01680), Anna Hvass (01243), SNP (00711)

Raise concern over impact of development of this site on both existing houses adjacent to the site and proposed development. Suggest that there is a danger of increased flooding, both within and outwith the site, due to development removing the natural landscape. Some respondents Cite Wallace High School having to raise the level of pitches due to flooding issues. Some respondents cite that SEPA are not supportive of the development.

Donato Tedesco (01498), Michael Burt (SLDP\_1109), Joanne O Cinneide (01595), Andrew McCormack Snr (01247), Jamie McCormack (01560), Andrew McCormack (01561), Jeanette McCormack (01562), Lee McCormack (01563), Iain Jamieson (01552), Alison Little (01260), Mr and Mrs R.L. Myles (01487), Aileen Penny (01490), Kevin Swingler (SLDP\_867), Christopher Campbell (01471), Steven Hamilton (01098), Catherine Lafferty (SLDP\_932), Anne McInnes (01525), Annie McIntosh (01528), June Edmonds (01610), Iain Graham (01047), Emma Cavanagh (01573), Carol Bretenoux (01535), Linzi Bryce (01548), Douglas and Christine McFadzean (01574), H. Willis (01647), Steven MacLean (01643), Tanja MacLean (01642), Sarah McLellan (01265), Causewayhead Community Council (SLDP\_80), Kenneth and Doreen Ferguson (00260), Joanna Tedesco (01499), Robert and Catherine Forsyth (01495), Isabel Steel (01502), James Weldon (00430), SNP (00711), Duncan McDougall (SLDP\_1384), Stewart Hartfield (00140), Jill Burt (00308)

General concern over potential flooding impacts. Some respondents cite that SEPA are not supportive of the development.

Kevin Swingler (SLDP\_867), Anna Hvass (01243)

Concerned that the development will have large areas of standing water which will stagnate or overflow.

Mrs Elizabeth Huntly (00654)

Concerned that the proposed development may led to subsidence of the new properties.

Robert Beveridge (01447)

Considers that more information on flooding impact is needed.

Tracy Jamieson (01680)

Concerned that Stirling Council is ignoring independent experts regarding flooding and questions the planning process. States will be seeking legal advice against a potential loss in property value if property becomes part of a flood area as a result of a Council decision.

Anna Hvass (01243)

Cites report by Buro Happold which demonstrates that the area is liable to fluvial flooding due to poor limited drainage and acknowledge that some flooding is due to the Allan Water. Notes concerns raised by a local expert regarding the Forglen Burn, the effects of storm surges, tidal influences and how surface drainage can be improved without affecting the Forglen Burn. Concerned that the former clay mines in the area will affect the proposed loch.

Robert Beveridge (01447)

Would support development if it can be shown that the flooding issue can be mitigated.

Alan Christie (01588)

Considers that the risk of flooding is overstated, and only happens in extreme conditions. Although states that where there is flooding this would need to be resolved to ensure there was no risk of any flooding in the future.

SNP (00711)

Resubmit previous comments. Would seek to safeguard the following conditions; The developer carries out a full hydrological analysis of the site and consider flooding impacts on both the site and surrounding properties; The protection of surrounding properties is to be key to any flood scheme and; Do not support the wetlands principle of flood control and seek retention of the "loch"

SEPA (SLDP\_175)

An assessment of flood risk (FRA) is required and this has been requested in the MIR. State that there is a surface water risk on the site and that there is ongoing consideration of this site through the planning application.

#### Green Belt

Mr and Mrs Craig (01678), David Parkinson (01663), Kate Fuller (01662), Sian Gordon (00254), Jean Hutton (01660), Craig Miller (01604), Andrew McCormack Snr (01247), Jamie McCormack (01560), Andrew McCormack (01561), Jeanette McCormack (01562), Scott Urquhart (01554), Gareth Bryan-Jones (00029), Claire Gent and Stephen Hunter (00168), Iain Jamieson (01552), Dr Kevin H. Lynch and Dr Jennifer Lynch (00994), Niels Hvass (01076), Joan and John Hvass (00013), Dr Ian Grieve (00105), Mr and Mrs R.L. Myles (01487), Fiona MacLeod (00676), Steven Hamilton (01098), Linda Hamilton (SLDP\_1218), William McLellan (SLDP\_1375), Anne McInnes (01525), Annie McIntosh (01528), Joan Keen (SLDP\_1307), Mrs and Mr McCreath (01184), Fiona Taylor (01529), Holger Nehring (01531), Gillian Allison (SLDP\_1012), Vanessa Jones (00216), June Edmonds (01610), Antony Pilkington (01608), Iain Graham (01047), Thelma Barron (01596), Keith Robb (01585), Joyce Carberry (01123), David Philp (01580), Philip Leeks (SLDP\_1398), Graham Meikle (01572), Louise McLeod (01549), Linzi Bryce (01548), Jaqueline and Alistair Edmiston (01547), Douglas and Christine McFadzean (01574), H. Willis (01647), Gary Thomas (00657), Sarah McLellan (01265), Mrs M Campbell (01466), Kenneth and Doreen Ferguson (00260), William Marshall (00010), Leslie Fisher (00177), Isabel Steel (01502), Julia Hector (00017), SNH (SLDP\_33), Kirsty Watson (01507), Linda Galloway (01140), Anna Hvass (01243), James Weldon (00430), SNP (00711), Jill Burt (00308)

Object to the site being removed from the Green Belt. Some respondents cite Examination report of current LDP stating that development here would remove a significant aspect of the function and value of the green belt.

Donato Tedesco (01498), Joanne O Cinneide (01595), Niels Hvass (01076), Aileen Penny (01490), Helen Cormack (01650), Causewayhead Community Council (SLDP\_80), Joanna Tedesco (01499)

Concerned removal of the greenbelt designation of the site will remove the Open Space that would affect the quality of life for local residents.

Sian Gordon (00254), Michael Burt (SLDP\_1109), Leslie Fisher (00177)

Concerned that removal of the green belt would set a precedent for further green belt development within Stirling.

Scott Urquhart (01554), Claire Gent and Stephen Hunter (00168), Joan and John Hvass (00013), Joan Keen (SLDP\_1307), June Edmonds (01610), Graham Meikle (01572), Jacqueline and Alistair Edmiston, Robert and Catherine Forsyth (01495), Tracy Jamieson (01680), Anna Hvass (01243)

Suggests that the removal of the green belt designation will have negative implications on tourism and reduce Stirling's attractiveness for people wanting to live, work or visit the area.

Niels Hvass (01076), Joan and John Hvass (00013), Anna Hvass (01243)

States that a site currently used for food production should not be lost to development.

Isabel Steel (01502)

Considers that the development is contrary to the plans aims of "Encouraging local food production."

Linda Galloway (01140)

Questions what has changed that warrants a change to the green belt in this area.

Anna Hvass (01243)

Considers Scottish Planning Policies emphasise placemaking and encouraging a sense of place and these need to be taken into account in relation to the current green belt designation of the site.

#### Open Space/Green Network

Kate Fuller (01662), Chris Waring (01578)

Suggests that if site is to be developed there should be amenity space provided.

Malcolm Hector (00016)

Raise concerns over the developer's ability to carry out the community benefit package put forward by the developers regarding open space.

Claire Gent and Stephen Hunter (00168)

Suggest that the proposed green corridor will be inaccessible.

Iain Jamieson (01552), Anna Hvass (01243)

Concerned that a housing led development is at odds with developers stated intentions to allow community access to and use of the site.

Kevin Swingler (SLDP\_867)

Suggests the parkland offered by the development would not compensate for the loss of the greenbelt.

June Edmonds (01610), Anna Hvass (01243)

Suggests the site should be developed as a park or walking area.

Mrs M Morgan (00047)  
Supports the open space proposals.

Isabel Steel (01502), Linda Galloway (01140)  
Considers the development is contrary to the plans aims of "Green Networks".

Anna Hvass (01243)  
States that the new park and allotments proposed are for the new community that will come in and is not for the existing communities of Causewayhead and Bridge of Allan as they have their own facilities.

Alan Christie (01588)  
Considers that the open space to be retained to the north of the site is appropriate.

SNP (00711)  
Resubmit previous comments. Construction of any housing along Easter Cornton Road should allow for a "wide" area of open space to create an open linked route to the proposed park;

#### Use of Greenfield Site

Malcolm Hector (00016), Aileen Penny (01490)  
Do not agree with the identification of the site as it is a greenfield site and suggests that other brownfield sites should be developed first.

Dr Kevin H. Lynch and Dr Jennifer Lynch (00994), Fiona MacLeod (00676), June Edmonds (01610), Jaqueline and Alistair Edmiston (01547), Gary Thomas (00657), Mrs Elizabeth Huntly (00654), Tracy Jamieson (01680)  
Suggests there are other suitable sites for development in the Stirling area.

Helen Cormack (01650), Anna Hvass (01243)  
Suggests more could be done to utilise existing vacant properties.

Mrs M Campbell (01466)  
States that this is the only significant green space in the city and should remain so.

Anna Hvass (01243)  
Suggests Stirling has an ageing population and therefore in the next 20 years there will be less people looking for houses. Also states that the houses built on the former Wallace High School site have not all sold.

#### Coalescence

Mr and Mrs Criag (01678), Iain Jamieson (01552), Sian Gordon (00254), Michael Burt (SLDP\_1109), Jon Cape (01661), Joanne O Cinneide (01595), Claire Gent and Stephen Hunter (00168), Dr Kevin H. Lynch and Dr Jennifer Lynch (00994), Niels Hvass (01076), Joan and John Hvass (00013), Dr Ian Grieve (00105) Kevin Swingler (SLDP\_867), Joan Keen (SLDP\_1307), Mrs and Mr McCreath (01184), Holger Nehring (01531), Gillian Allison (SLDP\_1012), Vanessa Jones (00216), June Edmonds (01610), Antony Pilkington (01608), Iain Graham (01047), Keith Robb (01585), David Philp (01580), Philip Leeks (SLDP\_1398), Tracy Dick (01569), Emma Cavanagh (01573), Carol Bretenoux (01535), Linzi Bryce (01548), Douglas and Christine McFadzean (01574), Gary Thomas (00657), C R J Sugden (01448), Stirling Civic Trust (SLDP\_183), Kenneth and Doreen Ferguson (00260), Joanna Tedesco (01499), William Marshall (00010), Isabel Steel (01502), SNH (SLDP\_33), Anna Hvass (01243), SNP (00711), Stewart Hartfield (00140)

Raise concern that the development of this site would remove the separation between Causewayhead and Bridge of Allan. Airthrey Kerse remains the only visual separation between the 2 communities.

Iain Jamieson (01552), Niels Hvass (01076), Anne McInnes (01525), Julia Hector (00017), Tracy Jamieson (01680)

Raises concern over cumulative impact of recent and proposed development on the area.

Anna Hvass (01243)

Questions who the houses are for.

Alan Christie (01588)

Considers that the retention of the open space to the north of the site will retain a suitable separation between Causewayhead and Bridge of Allan.

SNP(00711)

Resubmit previous comments. To prevent coalescence a park trust should be set up to manage the open space. This area should be protected from future development and Royal Park status should be sought;

#### Landscape impact

Mr and Mrs Craig (01678), David Parkinson (01663), Iain Jamison (01552), Sian Gordon (00254), Michael Burt (SLDP\_1109), Jean Hutton (01660), Gareth Bryan-Jones (00029), Joan and John Hvass (00013), Kevin Swingler (SLDP\_867), Kieran Penny (01470), Joan Keen (SLDP\_1307), Holger Nehring (01531), Liliias McDonald (01603), David Philp (01580), Philip Leeks (SLDP\_1398), Carol Bretenoux (01535), Louise McLeod (01549), Douglas and Christine McFadzean (01574), Robert and Catherine Forsyth (01495), SNH (SLDP\_33), Anna Hvass (01243), Jill Burt (00308)

Raise concern that development of the site, which is carse land, would be highly visible and impact on key historic viewpoints such as those to/from Stirling Castle and the Wallace Monument.

Sarah Wilkie (01482), Fiona MacLeod (00676), Graham Meikle (01572)

Concerned over the loss of the landscape.

Mrs and Mr McCreath (01184), SNH (SLDP\_33), Anna Hvass (01243)

Development will have an adverse impact on the landscape.

University of Stirling (SLDP\_324)

Suggest there is a need to protect the campus's "front door" identity in the event of the development of the site and that the University is properly integrated into any development.

June Edmonds (01610), Anna Hvass (01243)

Concerned about the impact the development of this site will impact the current outlook from the entrance to the University.

Historic Environment Scotland (01613)

Note that there is no mention of the sites proximity to the Airthrey Castle Designed Landscape in the site assessment.

C R J Sugden (01448)

Raises concern over how the built development will appear. Considers it will result in an urban eyesore as there are no landscape features or mature vegetation that can provide screening.

Joanna Tedesco (01499), Donato Tedesco (01498)

Consider the site is of historical importance citing connections with the Battle of Stirling Bridge and that the site was the location of Scotland's first powered flight.

William Marshall (00010)

Raises concern that the area in the vicinity of the Wallace Monument will suffer further with cumulative impact from the development and the existing electricity pylons to the east.

Isabel Steel (01502)

Considers that the development is contrary to the plans aims of listing historic sites.

Julia Hector (00017)

Believes there is a by-law in place prohibiting development in green spaces visible from the Wallace Monument.

SNH (SLDP\_33)

Consider that the site is unlikely to have the landscape capacity to accommodate development of this scale. State that there may be scope for a limited amount of development to the South East of the site, adjacent to the high school.

Duncan McDougall (SLDP\_1384)

Does not agree with the placemaking or the landscape assessment of the site. Considers that this is related to the core area issue previously mentioned. States a Landscape and Visual Impact Assessment has already been submitted as part of the application and concerned this has been ignored. Further, states that under the historic environment assessment an archaeological evaluation is required and this has been submitted through the application.

#### Natural Environment

Donato Tedesco (01498), Craig Miller (01604), Stephanie Miller (01602), Kathryn Anderson (01551), Joanna Tedesco (01499), Anna Hvass (01243), Jill Burt (00308)  
Believes that development of the site would have a detrimental impact on biodiversity.

Michael Burt (SLDP\_1102), Linda Hamilton (SLDP\_1218), Anna Hvass (01243), James Weldon (00430)

Concerned that there would be a negative impact on natural green space and wildlife by development of this site.

Mr and Mrs R.L. Myles (01487), Causewayhead Community Council (SLDP\_80)

Raise general concern that the development will impact on the environment.

Gillian Allison (SLDP\_1012)

Concerned over biodiversity impacts.

Graham Meikle (01572)

Environmental impact of site not resolved.

Causewayhead Community Council (SLDP\_80)

Concerned that the issue of climate change has not been addressed.

Anna Hvass (01243)

Concerned that ground conditions and contamination will cause problems for the proposed allotments. Concerned that the removal of the green belt will reduce the open

space for wildlife in the area. Lists a variety of animals that have been spotted in the area, along with wild flowers.

Duncan McDougall (SLDP\_1384)

Does not agree with the MIR site assessment that there are no known constraints or potential contamination. Suggests that flooding is a ground constraint.

#### Density

Kate Fuller (01662), Chris Waring (01578)

Concerned that the number of units proposed represent over density of the site.

Aileen Penny (01490)

Considers there is no need for larger houses in the area and there should only be affordable houses built for first time buyers and those on a low/average income.

Linda Galloway (01140)

Considers there are cases where developers get planning permission due to the promise of providing affordable housing

Mrs Elizabeth Huntly (00654)

Concerned over the amount of housing proposed for the area.

Robert McOwan (00475)

Considers the number of houses to be unacceptable due to negative impact on Bridge of Allan.

Linda Galloway (01140)

Suggests the reason for the allocation of 300 units is related to the shortfall identified by the reporters at the current LDP examination. Notes that previously the site was identified as capable of producing 800 units.

Joanna Tedesco – 01499

Considers that the proposed development would result in a disproportionate number of houses concentrated in the one area.

Alan Christie (01588)

Considers that 300 units is not disproportionate in planning terms.

#### Infrastructure - General

Michael Burt (SLDP\_1109), Alison Little (01260), Sarah Wilkie (01482), Catherine Lafferty (SLDP\_932), Annie McIntosh (01528), Joan Keen (SLDP\_1307), Fiona Taylor (01529), Vanessa Jones (00216), Joyce Carberry (01123), Emma Cavanagh (01573), Linzi Bryce (01548), Gary Thomas (00657), Kenneth and Doreen Ferguson (00260), Stewart Hartfield (00140), Jill Burt (00308)

Raise general concern over how the development will impact on current provision of services.

Fiona Taylor (01529)

Concerned the development does not appear to propose any additional services.

#### Infrastructure - Education Capacity

Kate Fuller (01662), Chris Waring (01578), Alan Christie (01588)

Suggests that if site is to be developed a school should be provided.

Donato Tedesco (01498), Sian Gordon (00254), Craig Miller (01604), Stephanie Miller (01602), Scott Urquhart (01554), Kathryn Anderson (01551), Linda Hamilton (SLDP\_1218), Fiona Taylor (01529), Iain Graham (01047), Emma Cavanagh (01573). Louise McLeod (01549), Joanna Tedesco (01499), Kirsty Watson (01507)  
Raise concern over education capacity at local schools.

Craig Miller (01604), Stephanie Miller (01602)  
Raise concern that the additional school proposed will not alleviate capacity constraints and that the high school will not be able to cope with the input from an additional primary school.

Malcolm Hector (00016)  
Raises concerns over the developers to carry out the community benefit package put forward by developers regarding education provision.

Kirsty Watson (01507)  
Considers that if a new primary school is to be built, it should be completed in advance of any development.

SNP(00711)  
Resubmit previous comments. Contend that the identification of the site will likely result in education capacity constraints and a full review of education provision is required.

#### Infrastructure - Health Capacity

Kate Fuller (01662), Chris Waring (01578)  
Suggests that if site is to be developed a health facility should be provided.

Scott Urquhart (01554), Kathryn Anderson (01551), Linda Hamilton (SLDP\_1218), Joyce Carberry (01123), Emma Cavanagh (01573)  
Concerned that development of this site would increase pressure on existing health facilities.

SNP (00711)  
Consider that there are concerns over provision of health services and would seek to have these considered for all aspects of potential development.

#### Infrastructure – Waste, Water and Drainage

Scottish Water (SLDP\_126)  
Note that there would be adequate water supply but that there is possible further investigation needed on the local network. There is capacity at the waste water treatment works. Developer is advised to contact Scottish Water as early as possible.

Andrew McCormack Snr (01247), Jamie McCormack (01560), Andrew McCormack Jnr (01561), Jeanette McCormack (01562), Lee McCormack (01563)  
Concerned who would be responsible for the drainage systems should the development go ahead.

Dr Ian Grieve (00105), Mrs Valerie Sinclair (01256), Christopher Campbell (01471)  
Raises concern over the cost and commitment to maintenance of a pumping system to remove excess water.

Kevin Swingler (SLDP\_867)  
Considers the possibility of the pump system failing and flooding nearby properties is too great a risk to allow development.

Mrs Valerie Sinclair (01256)

States there is no mention of how the development will deal with additional sewage.

William McLellan (SLDP\_1375), Sarah McLellan (01265)

States there will be significant challenges for the provision of infrastructure.

Emma Cavanagh (01573)

Concern over drainage impact.

Graham Meikle (01572)

Drainage issues have not yet been resolved.

SNP (00711)

Resubmit previous comments. The proposed loch will require storage, likely to be elevated and require pumping. The maintenance of which has to be agreed and adequate safeguards in place in the event of failure.

Duncan McDougall (SLDP\_1384)

Considers that previous comments from Scottish Water advising that the area water treatment works could not accommodate the development are being ignored

#### Infrastructure – General Transport

Joanne O Cinneide (01595), Iain Jamieson (01552), Niels Hvass (01076), Joan and John Hvass (00013), Alison Little (01260), Mr and Mrs R.L. Myles (01487), Vanessa Jones (00216), Iain Graham (01047), Thelma Barron (01596), David Philip (01580), Tracy Dick (01569), Linzi Bryce (01548), Helen Cormack (01650), SNP (00711)

Raise general concern that the development will increase pressure on local infrastructure.

Cycle Stirling (01039)

Consider that cycle routes should be prioritised as attractive and well-designed routes.

Anna Hvass (01243)

Suggests that the sites biodiversity features increases its attractiveness to walkers, joggers and cyclists and makes a contribution to a sustainable transport strategy.

Alan Christie (01588)

Agrees with the transport assessment of the site in the MIR.

#### Infrastructure - Roads

Mr and Mrs Craig (01678), David Parkinson (01663), Kate Fuller (01662), Iain Jamieson (01552), Donato Tedesco (01498), Michael Burt (SLDP\_1109), Jean Hutton (01660), Craig Miller (01604), Stephanie Miller (01602), Andrew McCormack Snr (01247), Jamie McCormack (01560), Andrew McCormack (01561), Jeanette McCormack (01562), Lee McCormack (01563), Scott Urquhart (01554), Gareth Bryan-Jones (00029), Claire Gent and Stephen Hunter (00168), Dr Kevin H. Lynch and Jennifer Lynch (00994), Niels Hvass (01076), Joan and John Hvass (00013), Mrs Valerie Sinclair (01256), Linda Hamilton (SLDP\_1218), William McLellan (SLDP\_1375), Anne McInnes (01525), Annie McIntosh (01528), Joan Keen (SLDP\_1307), Fiona Taylor (01529), Holger Nehring (01531), June Edmonds (01610), Antony Pilkington (01608), Liliias McDonald (01603), Thelma Barron (01596), Keith Robb (01585), Joyce Carberry (01123), David Philp (01580), Philip Leeks (SLDP\_1398), Graham Meikle (01572), Carol Bretenoux (01535), Louise McLeod (01549), Douglas and Christine McFadzean (01574), Chris Waring (01578), Gary Thomas (00657), Sarah McLellan (01265), Kenneth and Doreen Ferguson (00260), Joanna Tedesco (01499), Robert and Catherine Forsyth (01495), Isabel Steel (01502), Julia Hector (00017), Tracy Jamieson (01680), Anna Hvass (01243)

Raise concern that the level of development proposed will have a detrimental impact on the surrounding road network. Some respondents cite current capacity issues on routes to and from the city at peak hours.

University of Stirling (SLDP\_324)

Raise concern over the capacity of the current road network and suggest the need for a transport review. State that the future plans for the University must not be compromised by insufficient road capacity.

Scott Urquhart (01554), Joyce Carberry (01123), Louise McLeod (01549), Gary Thomas (00657)

Concerned that the increased traffic will have an impact on air quality.

Holger Nehring (01531)

Concerned that increased traffic would lead to a breach of EU directives on air quality and result in legal action.

Keith Robb (01585)

Concerned that noise and particulate concentration would increase to the detriment of the community.

Scott Urquhart (01554), Graham Meikle (01572), Julia Hector (00017)

Concerned that the increased traffic will have an impact on road safety.

Scott Urquhart (01554), Niels Hvass (01076), Joan Keen (SLDP\_1307)

Concerned that development of the site will impact on parking for residents.

Claire Gent and Stephen Hunter (00168)

Concerned that the proposals do not take account of the Kildean to Airthrey Road link.

Mrs and Mr McCreath (01184)

Raise concern regarding transport assumptions with regards to the site.

Anna Hvass (01243)

Raises safety concerns for an increased number of pedestrians navigating Causewayhead roundabout. Further, considers that the proposed Kildean to Airthrey link road will not, on balance, solve traffic congestion as the obvious desire line for traffic heading towards Stirling is to use Stirling Bridge. Cites the 1986 construction of the A91 Stirling Easter Distributor Road as an example. Reiterates the Community Councils concerns that the site is not sustainable from a transport perspective due to long walking distances to local services and public transport, the site is difficult to access, would have local and wider traffic impacts and also that the formation of new roads is likely to impact on the sensitive hydrology of the area.

Alan Christie (01588)

Agrees that a new distributor road is needed between Airthrey Road and Kildean. Suggests that in addition to the main access to the site off of Airthrey Road there should also be access from Easter Cornton Road.

Graham's The Family Dairy (SLDP\_327)

Notes that the traffic assessment submitted as part of the application does not require the development to take account of the Cornton to Airthrey road link or the replacement of the level crossing. The development layout should however make provision for both these projects and be tied to the phasing for the infrastructure upgrade.

SNP (00711)

Considers that there is complete opposition to the building of a link road. Resubmit previous comments that they are opposed to any building of a link road through the green belt.

#### Infrastructure - Rail

Mr and Mrs Craig (01678), David Parkinson (01663), Jean Hutton (01660), Claire Gent and Stephen Hunter (00168), Joan Keen (SLDP\_1307), Holger Nehring (01531), David Philp (01580), Philip Leeks (SLDP\_1398)

State that parking provision at local rail stations (Bridge of Allan, Dunblane and Stirling) is at capacity and concern that development will increase pressure further.

Network Rail (SLDP\_151)

Consider that the LDP should still provide support for Network Rail's intention to replace the current level crossings in the vicinity of the site with bridge crossings. State they may object to any application that would increase road traffic in advance of a bridge solution being provided. Further state that no site should be allocated for development that would physically impact a bridge being provided.

Network Rail also provide further background evidence to the closure of the road crossing and suggest that's that, should the Council so wish, the bridge solution provides an opportunity to relocate Bridge of Allan station.

Claire Gent and Stephen Hunter (00168)

Question why the Cornton level crossing is being replaced by a bridge.

Duncan McDougall (SLDP\_1384)

Considers that there is already a report highlighting the parking pressures at Stirling and Bridge of Allan train stations.

#### Retail

Kate Fuller (01662), Chris Waring (01578)

Suggests that if the site is to be developed there should be shops provided.

#### Construction Concerns – General

Malcolm Hector (00016), Julia Hector

Concerned about the impact on residents during the construction phase of the development.

#### Construction Concerns - Access

Craig Miller (01604), Stephanie Miller (01602), Antony Pilkington (01608)

Consider the proposal to use Easter Cornton Road for access during the construction phase to be unacceptable due to impact on local resident's amenity and structural integrity concerns.

#### Application

Christopher Campbell (01471)

Considers it has not been made clear in the MIR that there is a current application under consideration on this site.

Historic Environment Scotland (01613)

Note that the proximity of the site to the Airthrey Castle Designed Landscape is not mentioned in the site assessment. They have provided comments on this basis to the related application.

MacTaggart and Mickel (SLDP\_346)

Consider the site is effective and the technical reports submitted as part of the application confirm this.

Graham's The Family Dairy (SLDP\_327)

Considers that the application process has shown that the site is technically deliverable and one of the few strategic sites that can be developed in the short term meeting the tests of effectiveness as set out in PAN 2/2010. Extensive technical reports including an EIA, flood risk, traffic, landscape and visual impact, archaeology, ecology, education and noise impact assessments. These are supported further by a development framework, housing land analysis and economic impact case.

### **Schools**

Chelsea Walker (01659), Meg Jackson (01621), Rachel Fitzpatrick (01623), Rebecca Carmichael (01624), Jasmine Hunter (01625), Ami Thomson (01628), Lewis Goldie (01630), Jgorg Jvonovo (01627), Mille MacRae (01636), Alasdair Johnston (01653), Emily Gray (01655), Laura Turner (01656)

Do not believe the site is suitable to build on due to various concerns regarding impact on future residents from development in close proximity to the School; flooding issues; coalescence with Bridge of Allan; loss of farm land; increase in congestion from increased traffic; impact of children from development at the high school; potential impact on biodiversity; and landscape impact of the development.

Erin Mason (01622)

Believes that the site can possibly be developed, although raises concerns over loss of farmland and capacity at the high school.

Lana Crow (01626)

'On the fence' regarding development and sites negative aspects such as loss of greenbelt and increased traffic congestion and positive aspects such as potential to create more jobs and services. Concerned that the area will become overpopulated as a result, and swaying towards disagreement.

Rhys Williamson (01629)

Concerned that a provision of a new school near a railway may impact safety.

Beth Leaver (01635)

Does not believe that the entire site should be built on as it is a very scenic area. Considers that building on half of the site would be good.

Flemming M'Ratu (01637)

Considers the development would provide new jobs.

Marc Wilkie (01651)

Considers the development would reduce congestion as the schools would be in walking distance.

Jake Gilmour (01652)

Does not agree with entire site being developed, although there may be scope for some housing at both the Bridge of Allan and Causewayhead side, whilst retaining the green belt separation of the 2 communities.

Overall, 12 students did not support development, 8 were unsure and 4 supported development of this site.

**Drop in Sessions**

114 – Do not support development of this site

1 – Unsure

8 – Support development of this site

**Stirling Council Response:**Summary

In 2014 the applicant submitted an application for the Development of a public park, residential development (including affordable housing) of 600 units, commercial space (neighbourhood centre), improvements to road and drainage infrastructure and new primary school (14/00595/PPP). The application was under consideration concurrent with the MIR process. The application was considered by Elected Members at a Full Council Meeting on the 23<sup>rd</sup> March 2016. The Council voted in favour of refusing the application. The application was refused on the following grounds:

- In the opinion of the Planning Authority, the benefits of granting Planning Permission in Principle do not outweigh non-compliance with the Development Plan Policies; and
- In the opinion of the Planning Authority, the proposed Section 75 Legal Agreement and planning conditions do not satisfactorily mitigate the impact of the development, in particular considering the erosion of the Green Belt and risks arising from the impact of the development in respect of the flooding and transportation.

The outcome of this application supersedes the MIR process and the site is no longer considered to be an option as stated in the 2015 MIR. The site will therefore not feature in the Proposed Stirling Local Development Plan.

The current LDP requirements for land to be safeguarded for a route from Drip Road and Airthrey Road, a new road bridge over the railway in the event that Network Rail close the current at grade crossings, and a new primary school in the vicinity of the Causewayhead area will, however, be carried forward to the Proposed Stirling Local Development Plan.

Appeal against refusal

The applicant registered an appeal with the Directorate of Planning and Environmental Appeals on the 25<sup>th</sup> April 2016. This appeal is currently under consideration by a reporter appointed by Scottish Ministers.

Identification of the site in MIR

The examination of the, now adopted, Proposed LDP concluded that all reference to Airthrey Kerse be removed from the plan before it was adopted. The 2014 Stirling LDP therefore does not identify the site for housing development. The reporters report, however, also concluded that the *"planning authority is right to consider the development potential of H056, especially if that might support and absorb the necessary new road and rail crossings. Consequently, some form of H056 should be reconsidered for possible later inclusion into a future plan, once the infrastructure and flooding issues have progressed and resolutions are found. SPP is not a total and permanent embargo on development in the green belt."*

On this basis the applicants submitted a Planning Permission in Principle application with supporting documents to demonstrate the sites viability. The applicants also responded to the 'Call for Sites' stage that took place at the end of 2014. The Council concluded that there was still potential, if constraints could be overcome, for the site to contribute to the land supply in some form. Page 37, and the site assessment on page 222, of the MIR explains that whilst the site is not without constraints and requires sensitive development,

the site is preferable to further green belt and greenfield release elsewhere in the city. Other potential development sites to the west, south and east of the city would further expand built development into the open countryside, which would result in developments that are poorly connected to existing services and facilities. Areas to the south and west of the city would raise particular concern in terms of the historic setting of Stirling and designated battlefields.

The MIR attempted to achieve a balance between the national requirements to identify a 'generous supply' of housing with site specific concerns and identified 3 options for future development. The MIR was approved by Council In June 2015 which identified Option 1 (without Airthrey Kerse) as the Council's proposal, with Option 2 and 3 (both with 300 units at Airthrey Kerse) as a reasonable alternative to form the basis of consultation.

#### Neighbour notification

At MIR stage sites are only identified as potential options for discussion and no final decision has been made, unless superseded by the granting of planning permission via the development management process. There is therefore no requirement to formally notify neighbouring properties individually of the identification of the site in the MIR. The Council, however, must widely publicise the MIR consultation period and comply with statutory notices and timescales as set out in legislation.

For the MIR consultation the Council went beyond these requirements to ensure that as many people were notified as possible to encourage responses to the consultation. It is not practical or cost effective for the Council to write to every property in the council area notifying the consultation, however a variety of approaches were used and included:

- Following the neighbour notification procedures for planning applications by formally notifying neighbouring properties that were within 20m of a site identified as an option. This letter included details of the site, a link to the MIR, how to comment and details of the consultation events;
- Formally notifying community councils of the MIR consultation period, how to comment and details of consultation events;
- Placing statutory notices in the Stirling Observer detailing the formal consultation of the MIR and how to comment;
- The MIR consultation was publicised on the home page of the Stirling Council website;
- 6 consultation events were held, both in the evening and at weekends, in those communities that would be most directly affected by the options;
- These events and the MIR consultation were posted on social media via the Council's Facebook and Twitter accounts; and
- Copies of the MIR and posters advertising the events distributed to all local libraries.

The Council has welcomed the comments on the consultation process and seeks to continually improve the way in which the Council publicises consultations.

Ref.	2	HILLSIDE, DUNBLANE (DUN10)
<b>Representations by:</b>		
SLDP_33 – SNH SLDP_85 – Dunblane Community Council SLDP_126 – Scottish Water SLDP_765 – Anne Aitken SLDP_960 – Henriette Laidlaw SLDP_1012 – Gillian Allison SLDP_1031 – Iain Sneddon SLDP_1062 – Maurice Campbell SLDP_1066 – Iona Leishman SLDP_1068 – David Spooner SLDP_1135 – Denise Kelly SLDP_1154 – B. Clark SLDP_1275 – S. Profili 01039 – Cycle Stirling 01412 – Shirley Gallivan 01415 – Hannelie Booy 01417 – Iain MacDonald 01418 – Sally MacDonald 01420 – D. Greenhill 01421 – Paul Shaw 01422 – Craig Smith 01423 – James McIntosh 01432 – Colin McKenzie 01433 – Steve Nevill 01434 – Annette Kupke 01435 – Alistair & Irene McPherson 01436 – David Gemmell 01438 – Lynn Kelly 01440 – Lynne Douglas 01441 – William McRae 01443 – Helen Wynd 01445 – Alan Campbell 01446 – John & Rosemary Hamilton 01450 – A.J. Abbott 01452 – Walter Abbot 01456 – Les O’Hare 01459 – Emma Forbes-Hayes 01460 – William & Marion Harvie 01461 – Robert Ford 01465 – Ken Smith 01467 – William & Sheena Perrie 01472 – John Cleghorn 01475 – Colin & Heather Booth 01476 – Keri Davies 01484 – Chris Gould 01485 – Elaine Campbell 01486 – Scott Christie 01489 – Sarah & Paul Ford 01491 – Colin, Anna & Nicola McCreddin 01492 – Garry Aitken 01493 – Jean Roman	01496 – Brian & Glenda Halbert 01505 – Jane Skinner 01506 – Campbell Aitken 01509 – Jacqueline Jones 01510 – Anne Baird 01511 – John Baird 01512 – Irene Milne 01513 – Keith Roman 01527 – Caroline Barlow 01532 – Norman & Catherine Sutherland 01533 – Moira Verrall 01534 – Paul Christmas 01538 – Mary Abercrombie 01539 – Colin Abercrombie 01540 – Lindsay Moore 01541 – Sheila Donald 01544 – Alexander Donald 01545 – Patricia Profili 01546 – Hannah Smith 01553 – Dandara 01558 – Roy Barlow 01564 – Gordon Roger 01565 – Iain Macfarlane 01566 – Karen Quin 01568 – Dan & Rebecca Curtis 01579 – Lynette MacKenzie 01581 – Ivor Butchart 01584 – Helen & Tony Mason 01589 – Robert Crawford 01590 – Veronica Milne 01591 – Moira Crawford 01594 – Peter Moore 01597 – Iain Milne 01598 – Kirsten Black 01599 – Fiona Talbot 01600 – Mr & Mrs Tarelli 01601 – Anna Skinner 01607 – Euan MacDonald 01613 – Historic Environment Scotland 01615 – Morag MacSween 01616 – Lorna Inglis 01641 – Ruth Butchart 01665 – Keith Mackenzie 01669 – David Witty 01670 – Anthony Ford 01672 – Karyn Webster 01676 – Martin Norve 01677 – Peter Farr 01695 – Sophie Gilchrist	

01494 – Derek Ward	01696 – Iona Grant
	<b>Total No.</b>

106

**Summary of Comments:**

The majority of respondents did not agree with the site's identification as an additional housing allocation option, objecting to the development of the site and/or raising a number of specific concerns.

Dunblane Community Council (SLDP\_85), Gillian Allison (SLDP\_1012), Maurice Campbell (SLDP\_1062), Iona Leishman (SLDP\_1066), David Spooner (SLDP\_1068), Paul Shaw (01421), Craig Smith (01422), James McIntosh (01423), Colin McKenzie (01432), Annette Kupke (01434), Alistair & Irene McPherson (01435), Lynn Kelly (01438), Lynne Douglas (01440), William McRae (01440), Alan Campbell (01445), Les O'Hare (01456), Robert Ford (01461), William & Sheena Perrie (01467), Elaine Campbell (01485), Scott Christie (01486), Sarah & Paul Ford (01489), Jean Roman (01493), Derek Ward (01494), Brian & Glenda Halbert (01496), Jane Skinner (01505), Anne Baird (01510), John Baird (01511), Irene Milne (01512), Keith Roman (01513), Caroline Barlow (01527), Norman & Catherine Sutherland (01532), Mary Abercrombie (01538), Colin Abercrombie (01539), Lindsay Moore (01540), Sheila Donald (01541), Alexander Donald (01544), Hannah Smith (01546), Karen Quin (01566), Ivor Butchart (01581), Lynette MacKenzie (01579), Robert Crawford (01589), Veronica Milne (01590), Iain Milne (01597), Fiona Talbot (01599), Anna Skinner (01601), Euan MacDonald (01607), Ruth Butchart (01641), Keith Mackenzie (01665), Peter Farr (01677), Sophie Gilchrist (01695), Iona Grant (01696) explicitly noted their objection/opposition to proposed development.

Dandara and Arnbathie Developments Ltd. (01553) have made representations promoting the development of the site and support the proposed allocation of that site for residential development under each of the three land release options set out by the MIR.

Development is also supported by S. Profili (SLDP\_1275) and Patricia Profili (01545) and Martin Norve (01676). Qualified support or no objection is offered by David Witty (01669), subject the retention of the woodland and D. Greenhill (01420) and Colin & Heather Booth (01475) providing the site is accessed solely via a new roundabout on the B8033.

The concerns and issues raised are noted below:

Loss of open space and woodland

Anne Aitken (SLDP\_765), Henriette Laidlaw (SLDP\_960), Iain Sneddon (SLDP\_1031), Gillian Allison (SLDP\_1012), Iona Leishman (SLDP\_1066), David Spooner (SLDP\_1068), Denise Kelly (SLDP\_1135), Shirley Gallivan (01412), Craig Smith (01422), Colin McKenzie (01432), Steve Nevill (01433), Annette Kupke (01434), David Gemmell (01436), Lynn Kelly (01438), Lynne Douglas (01440), Helen Wynd (01443), Alan Campbell (01445), John & Rosemary Hamilton (01446), Emma Forbes-Hayes (01459), William & Marion Harvie (01460), Robert Ford (01461), Ken Smith (01465), William & Sheena Perrie (01467), John Cleghorn (01472), Chris Gould (01484), Elaine Campbell (01485), Scott Christie (01486), Sarah & Paul Ford (01489), Colin, Anna & Nicola McCreddin (01491), Garry Aitken (01492), Jean Roman (01493), Brian & Glenda Halbert (01496), Jane Skinner (01505), Jacqueline Jones (01509), Anne Baird (01510), John Baird (01511), Irene Milne (01512), Keith Roman (01513), Caroline Barlow (01527), Norman & Catherine Sutherland (01532), Moira Verrall (01533), Paul Christmas (01534), Mary Abercrombie (01538), Colin Abercrombie (01539), Lindsay Moore (01540), Sheila Donald (01541), Alexander Donald (01544), Hannah Smith (01546), Roy Barlow (01558), Iain Macfarlane (01565), Karen Quin (01566), Lynette MacKenzie (01579), Veronica Milne (01590), Moira Crawford (01591), Iain Milne (01597), Kirsten Black (01598), Fiona Talbot (01599), Mr & Mrs Tarelli (01600), Anna Skinner (01601), Euan MacDonald (01607),

Morag MacSween (01615), Ruth Butchart (01641), Keith Mackenzie (01665), Anthony Ford (01670), Peter Farr (01677), Iona Grant (01696).

The biggest cause for objections and concern surrounded the loss of open space and woodland that would arise as a result of the development. The site is described as being used extensively by the local population for recreation, particularly dog walking, and children's outdoor play. As such it has positive benefits in terms of physical exercise; mental health and well-being; and as an amenity space.

The woodland is long established with ancient woodland characteristics, a rare and valuable ecological resource which Scottish Government policy states should be protected and enhanced. The broadleaved woodland is considered to be highly diverse. The value of the conifer woodland as a habitat is also highlighted. In addition to the ecological value of the woodland, its amenity value; value as an educational resource; and role as shelter belt/barrier from noise and pollution associated with the A9 and in carbon sequestration is also raised.

The area is considered to be the last remaining open space on the west side of Dunblane and the woodland the only such area within easy access of the residential areas on the western side of Dunblane and views as an important link between town and rural hinterland, encouraging access to wider countryside.

It is stated that any development should ensure all existing woodland is maintained and allow for the preservation and enhancement of the existing pedestrian accesses and maximise the areas of open space.

The loss of agricultural land was also noted.

#### Impact on services/amenities/infrastructure

Anne Aitken (SLDP\_765), Henriette Laidlaw (SLDP\_960), Iona Leishman (SLDP\_1066), David Spooner (SLDP\_1068), Shirley Gallivan (01412), Hannelie Booy (01415), Iain MacDonald (01417), Sally MacDonald (01418), Paul Shaw (01421), James McIntosh (01423), Annette Kupke (01434), Alistair & Irene McPherson (01435), Lynne Douglas (01440), Helen Wynd (01443), Alan Campbell (01445), Emma Forbes-Hayes (01459), William & Marion Harvie (01460), Robert Ford (01461), Ken Smith (01465), William & Sheena Perrie (01467), Elaine Campbell (01485), Scott Christie (01486), Colin, Anna & Nicola McCreddin (01491), Garry Aitken (01492), Jean Roman (01493), Derek Ward (01494), Jacqueline Jones (01509), Anne Baird (01510), John Baird (01511), Irene Milne (01512), Keith Roman (01513), Norman & Catherine Sutherland (01532), Moira Verrall (01533), Paul Christmas (01534), Mary Abercrombie (01538), Lindsay Moore (01540), Hannah Smith (01546), Iain Macfarlane (01565), Ivor Butchart (01581), Lynette MacKenzie (01579), Helen & Tony Mason (01584), Robert Crawford (01589), Veronica Milne (01590), Moira Crawford (01591), Peter Moore (01594), Iain Milne (01597), Mr & Mrs Tarelli (01600), Anna Skinner (01601), Euan MacDonald (01607), Lorna Inglis (01616), Ruth Butchart (01641), Keith Mackenzie (01665), Anthony Ford (01670), Karyn Webster (01672), Peter Farr (01677)

The capacity of services and infrastructure in Dunblane to accommodate further residential development was expressed as another pressing issue. It is widely considered that such facilities are already at capacity, with no or limited scope to be extended and that Dunblane is as big as the existing infrastructure can support. Comments were made in respect to the following:

- Primary and Secondary schools: considered to be at or near capacity with further development having the potential to impact on the quality of education, along with recent budget cuts;
- Health services (doctors and dentist): also considered to be at capacity, with further development likely to lead to increased waiting times for appointments;
- Sewerage works: issues relating to odours from the sewerage works were highlighted;
- Gas and water pressure;

A number of representations implied that Dunblane has had its 'fair share' of development in recent years and that new housing should be directed elsewhere; that housing development in Dunblane has not been matched by community infrastructure development, reducing the quality of life for existing residents; that the town lacks amenities such as a swimming pool, petrol station, sports facilities; and that the focus should be on brownfield sites not upon greenfield sites such as this.

It was stated investment in community infrastructure should be a pre-requisite of housing development and/or proposed houses should be re-distributed among communities that have not suffered this imbalance.

#### Transport and access

Dunblane Community Council (SLDP\_85), Anne Aitken (SLDP\_765), Anne Aitken (SLDP\_765), Iona Leishman (SLDP\_1066), David Spooner (SLDP\_1068), Denise Kelly (SLDP\_1135), Shirley Gallivan (01412), Hannelie Booy (01415), Iain MacDonald (01417), Sally MacDonald (01418), Craig Smith (01422), James McIntosh (01423), Annette Kupke (01434), David Gemmell (01436), Helen Wynd (01443), A.J. Abbott (01450), Walter Abbot (01452), Emma Forbes-Hayes (01459), Robert Ford (01461), William & Sheena Perrie (01467), John Cleghorn (01472), Elaine Campbell (01485), Scott Christie (01486), Garry Aitken (01492), Jean Roman (01493), Derek Ward (01494), Brian & Glenda Halbert (01496), Jane Skinner (01505), Jacqueline Jones (01509), Anne Baird (01510), John Baird (01511), Irene Milne (01512), Keith Roman (01513), Moira Verrall (01533), Paul Christmas (01534), Mary Abercrombie (01538), Colin Abercrombie (01539), Lindsay Moore (01540), Sheila Donald (01541), Alexander Donald (01544), Hannah Smith (01546), Iain Macfarlane (01565), Dan & Rebecca Curtis (01568), Ivor Butchart (01581), Lynette MacKenzie (01579), Helen & Tony Mason (01584), Veronica Milne (01590), Moira Crawford (01591), Iain Milne (01597), Kirsten Black (01598), Mr & Mrs Tarelli (01600), Anna Skinner (01601), Euan MacDonald (01607), Morag MacSween (01615), Lorna Inglis (01616), Keith Mackenzie (01665), Anthony Ford (01670)

Concern was expressed about increased traffic and the access arrangements to/from the proposed site, particularly where this was to be via existing streets, Argyle Way and Montgomery Crescent/Douglas Place. These streets were described as narrow, suburban roads not suitable for increased traffic, with safety concerns and increased danger to pedestrians and cyclists raised. The steep topography of a number of the surrounding streets was highlighted as a particular issue during snow and ice.

The impact of increased traffic was highlighted as an issue in a wider sense in Dunblane, including at the Keir roundabout, town centre and Old Doune Road. It was stated that Dunblane could not cope with additional traffic and that there were limited means of reconfiguring road network. Parking was also raised as a problem around the town centre which would be exacerbated by further development.

The inadequacy of train services and bus services was raised; as was the increase in pollution that would arise from further traffic. It was also commented that due to insufficient

employment opportunities in Dunblane, new residents would be required to commute for work, with associated impacts on congestion, etc.

Jane Skinner (01505), Sheila Donald (01541), Alexander Donald (01544) and Peter Moore (01594) insisted any development must be accessed from the B8033.

#### Green belt

Gillian Allison (SLDP\_1012), Maurice Campbell (SLDP\_1062), Iona Leishman (SLDP\_1066), David Spooner (SLDP\_1068), Sally MacDonald (01418), Paul Shaw (01421), Lynne Douglas (01440), Robert Ford (01461), Keri Davies (01476), Brian & Glenda Halbert (01496), Jane Skinner (01505), Anne Baird (01510), John Baird (01511), Sheila Donald (01541), Alexander Donald (01544), Iain Macfarlane (01565), Karen Quin (01566), Lynette MacKenzie (01579), Veronica Milne (01590), Iain Milne (01597), Anna Skinner (01601), Euan MacDonald (01607), Lorna Inglis (01616)

Objections were raised on the grounds the land has been designated as green belt and should not be developed. Reference was made to the 2012 Green Belt Review, which concluded that the green belt boundary in this location should be retained. It was considered not reasonable to set aside this conclusion only three years later while the reasons are still valid.

Further comment was made that development would breach a robust green belt boundary; would set a dangerous precedent; contradict existing policy; and impact detrimentally on the identity of the settlement, specifically through further coalescence of Bridge of Allan and Dunblane.

#### Impact on biodiversity

Anne Aitken (SLDP\_765), Gillian Allison (SLDP\_1012), Iain Sneddon (SLDP\_103), Iona Leishman (SLDP\_1066), David Spooner (SLDP\_1068), Hannelie Booy (01415), Craig Smith (01422), Colin McKenzie (01432), Annette Kupke (01434), Alan Campbell (01445), Emma Forbes-Hayes (01459), Ken Smith (01465), William & Sheena Perrie (01467), Sarah & Paul Ford (01489), Colin, Anna & Nicola McCreddin (01491), Brian & Glenda Halbert (01496), Jane Skinner (01505), Jacqueline Jones (01509), Anne Baird (01510), John Baird (01511), Irene Milne (01512), Caroline Barlow (01527), Moira Verrall (01533), Mary Abercrombie (01538), Colin Abercrombie (01539), Sheila Donald (01541), Alexander Donald (01544), Hannah Smith (01546), Roy Barlow (01558), Kirsten Black (01598), Mr & Mrs Tarelli (01600), Euan MacDonald (01607), Anthony Ford (01670), Karyn Webster (01672)

Concern was raised about the impact of development and loss of habitat on biodiversity, with local residents having observed a wide range of flora and fauna in this area. In particular the woodland is noted as being Long Established with ancient woodland characteristics – an extremely rare and valuable ecological resource which Scottish Government policy states should be protected and enhanced. The broadleaved woodland is defined as highly diverse and the value of the conifer woodland as a habitat is also highlighted.

#### Character and appearance

Dunblane Community Council (SLDP\_85), Henriette Laidlaw (SLDP\_960), Iain Sneddon (SLDP\_103), Maurice Campbell (SLDP\_1062), Hannelie Booy (01415), Iain MacDonald (01417), Annette Kupke (01434), Helen Wynd (01443), Les O'Hare (01456), William & Marion Harvie (01460), Scott Christie (01486), Colin, Anna & Nicola McCreddin (01491), Derek Ward (01494), Brian & Glenda Halbert (01496), Jane Skinner (01505), Campbell Aitken (01506), Irene Milne (01512), Norman & Catherine Sutherland (01532), Paul

Christmas (01534), Sheila Donald (01541), Alexander Donald (01544), Hannah Smith (01546), Lynette MacKenzie (01579), Lorna Inglis (01616)

A number of responses stated development of the site would negatively impact on the unique character and appearance of Dunblane as a distinct, semi-rural, small town; new development would be prominent within an historic landscape which frames the settlement, especially on the approach from the south. It was stated that the immediate areas are 'overcrowded' and that the proposal would represent overdevelopment.

In particular, a new access off the B8033, including lighting, would be highly visible from the approach to Dunblane and would have the potential to significantly detrimentally alter the southern boundary to the town and create an area on the current southern boundary that will be under pressure for further development, pushing the town boundary up to Park of Keir and narrowing the separation between Dunblane and Bridge of Allan.

The impact on the Keir Local Landscape Areas and Designed Landscape was also raised. Historic Environment Scotland (01613) note preference for the area within the boundary of the Designed Landscape to remain undeveloped. Should this not be possible it is recommended that mitigation, for example the retention of historic structural planting, is put in place as developer requirements within the LDP.

Concern was also expressed that an increase in the population of Dunblane and the size of town would have a detrimental effect on the sense of community that exists in the town

#### Flooding

John & Rosemary Hamilton (01446), Derek Ward (01494), Irene Milne (01512), Iain Macfarlane (01565), Lynette MacKenzie (01579), Mr & Mrs Tarelli (01600), Euan MacDonald (01607)

It was noted that development would significantly reduce ability of site to retain rainwater, resulting in surface water flooding. It was observed that surface water flooding in even moderate rainfall is a major issue along Highfields and on to the B8033 and that development of Hillside would add to problems where drains are routinely overwhelmed, with knock on impacts on the sewerage works.

#### Residential amenity

James McIntosh (01423), William & Marion Harvie (01460), Brian & Glenda Halbert (01496)

Some respondents raised concerns surrounding the impact of development on residential amenity through the potential for overlooking, overshadowing, loss of privacy etc. and about increased traffic flow through the existing estate, which would no longer be a cul-de-sac and impact on the ability of local children to play unsupervised.

Also impact on private water supply to Wanderwrag Cottage and rights of way.

#### Impact on Roman Camp/road

Denise Kelly (SLDP\_1135), Ken Smith (01465), William & Sheena Perrie (01467), Chris Gould (01484), Scott Christie (01486), Hannah Smith (01546)

Reference was made to historically significant features of the site dating back to Roman times that would be impacted by development.

#### Housing need

Jane Skinner (01505), Sheila Donald (01541), Alexander Donald (01544), Lorna Inglis (01616), Gordon Roger (01564), Iain Macfarlane (01565)

Concern was expressed about the type of housing likely to be developed; a preference was indicated – should development go ahead – for affordable housing or a mix of housing types and sizes offering a range of housing options for local families rather than being geared towards the upper end of the housing market.

In support of the site, Dandara (01553) submit that:

- The site is capable of delivering around 130 units comprising a mix of house types and sizes in the short-term to meet the requirement to release additional housing land;
- The site forms a discreet, logical extension to Dunblane, bound on two sides by development and by the topography of the area. Existing woodland features help contain development;
- The site has good foot, cycle, rail and vehicular links. It lies within walking and cycling distance of the town centre thereby has the ability to increase footfall within the town centre whilst reducing the volume of vehicular traffic. Further development in the town will help regenerate the town centre.
- Development would facilitate improvements the management of the woodland with selective felling and replanting, allowing the woodland to be enhanced and safely enjoyed by the local community; a further community benefit.
- Core paths along the southern part of the site and informal linkages across the site would be incorporated into the layout of the site and enhanced along with open space and structural landscaping to ensure the sensitive growth of Dunblane;
- Education is not a constraint to the delivery of 100 homes in Dunblane and the site is in close proximity to both Dunblane Primary School and Dunblane High School;
- Vehicular access to the site would be provided from the B8033 to the south east. There are no constraints on the provision of such an access, subject to a satisfactory junction arrangement being agreed with the Roads Authority;

#### Other Comments

Steve Nevill (01433) is not against new development but insists analysis must be undertaken as to impact, with upgrades to infrastructure undertaken.

As an alternative development approach, David Witty (01669), suggested two smaller developments accessed from Douglas Place and Argyle Way

SNH (SLDP\_33) agree that the site has potential to become a self-contained and discrete extension to Dunblane. State a masterplanning approach should be undertaken to safeguard and enhance the green network on site, to maximise opportunities for biodiversity enhancement and/or that the site boundary should be amended to match the eastern boundary of Wanderwrang wood, unless the Council can be certain that this land will be safeguarded from built development.

Scottish Water (SLDP\_126) advise there is an adequate water supply, with possible further investigation required on local network and that in terms of waste water, Dunblane WWTW is currently undergoing a review to confirm exact capacity numbers.

B. Clark (SLDP\_1154) and Cycle Stirling (01039) provided comment on active travel issues, noting that there is an opportunity to improve path linking Baxters Loan with road to B8033 for more direct cycle routes and there is an urgent safety requirement to provide separate cycle lanes along the B8033 to/from the Keir roundabout.

**Schools**

At an engagement session held on 23<sup>rd</sup> October with year 4/5 pupils, 11 pupils did not support development of this site, 6 did not know or had no view, while 10 pupils did support development.

**Drop-in Sessions**

58 - Do not support development on the site

8 - Unsure

15 - Support development on the site

**Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. The site was deemed consistent with the Plan's Vision and Spatial Strategy and, taking account of the findings of the other assessment criteria, it was concluded the site should be identified as an additional housing allocation option in the MIR. The site was shown with an indicative capacity of 100 units.

The developer promoting the site supported the allocation of the site for housing, submitting that the site is capable of delivering around 130 units in the short-term to meet the requirement to release additional housing land. Conversely, the majority of the 106 submissions received relating to the site objected to the development of the site and/or raised a number of specific concerns.

The potential for new housing in Dunblane is significantly constrained by school capacity at both primary and secondary stages. It is acknowledged that existing primary school provision in Dunblane is limited, but existing planned development identified in the Housing Land Audit 2014 – plus a small amount of additional allocated housing consistent with the Main Issues Report (130 units) – can be accommodated with minor modifications to existing primary schools. The same applies to the High School.

The Council remains of the view that the assessment of this site set out in the MIR is valid, however, the scale of development envisaged by the developer (including beyond the Hillside site – see Issue 20, West and South Dunblane); potential loss of woodland; and impact, in landscape terms, of the required access to the site from the B8033 directly over the area marked as the 'Wanderwrang Strip' raise concerns.

In response to the Main Issues Report, the promoters of the Barbush site seek to increase the size of the site identified in the MIR for 30 houses to include the entire site designated for Employment & Retail in the adopted LDP, creating a residential capacity of up to 100 units.

In assessing the sites at Barbush and Hillside together and in the context of the education constraints, the Council considers that the site at Barbush is preferable for residential development. The principle of development at Barbush is already established in the adopted LDP and the site falls within the settlement boundary and is brownfield land. Development, including access, would have limited impact in terms of landscape and new housing would be seen in the context of recent residential development to the south and west.

The proposed plan therefore allocates a smaller site at Hillside than identified as an additional housing allocation option in the MIR. The site allocated represents an extension to Douglas Place and has an indicative capacity of 15 units. The number of units allocated at Barbush is increased from 30 to 80.

It is considered the allocation of a significantly smaller site at Hillside addresses a number of concerns raised in response to the MIR options, specifically regarding loss of open space and woodland; impact on biodiversity; transport and access; and impact on the character and appearance of this part of Dunblane. It is noted that an application site for 129 units at Hillside has been received by the Council.

Ref.	3	<b>HOUSING LAND</b>
<b>Representations by:</b>		
01522 – Raymond Bond SLDP_867 – Kevin Swingler SLDP_1218 – Linda Hamilton 01498 – Donato Tedesco 01666 – Inga Bullen 01486 – Scott Christie 01665 – Keith Mackenzie SLDP_1068 – David Spooner SLDP_151 – Network Rail 01664 – Sfumnatura Design Studio 01140 – Linda Galloway 01671 – G L Hearn 01670 – Antony Ford SLDP_1109 – Michael Burt 01667 – Laura Currie 00105 – Dr Ian Grieve SLDP_1009 – Ruth Burgess 00136 – Lynsey Ward 01672 – Karyn Webster 01660 – Jean Hutton 01673 – Craig Anderson 01606 – Cala Homes (West) 01396 – Westpoint Homes 01592 – Miller Homes SLDP_724 – Tulloch Homes SLDP_285 – Hallam Land Management 01556 – Scottish Enterprise 01179 – Hallam land Management and CEG Land Promotions SLDP_350 – Gladman Developments SLDP_272 – Stewart Milne Homes 01479 – Land & Property Holdings Ltd 01449 – P Carter SLDP_193 Tactran SLDP_1139 – John Brisbane & Son SLDP_263 – Taylor Wimpey	01508 – Ian and Val Beaton SLDP_230 – Cala Homes (West) SLDP_1012 – Gillian Allison SLDP_324 – University of Stirling 01553 – Dandara 01580 – David Philp SLDP_1398 – Philip Leeks SLDP_327 – Graham’s Dairy SLDP_1251 – Charles Connell & Co SLDP_70 – Kippendavie Group Trust SLDP_321 – Ogilvie Homes 01577 – Holder Planning SLDP_126 – Scottish Water SLDP_48 – Wallace Land & Investment 01581 – Ivor Butchart SLDP_188 – The Scottish Government 00711 – SNP Group 01391 – Homes for Scotland 01649 – Mona Kubiak 01648 – Kenneth Woolley 01645 – Fiona Bell 01644 – Lynette Paterson 01547 – Jacqueline Edminston 01579 – Lynette McKenzie 01643 – Steven McLean 01642 – Tanja McLean 01641 – Ruth Buchart 01639 – John Gray 01638 – William Kid SLDP_175 - SEPA 01410 – David Wright 01617 - CCG	
	<b>Total No.</b>	66
<b>Summary of Comments:</b>		
<p>A significant proportion of the responses received on Main Issue 1 refer in detail to specific sites. Comments on sites are generally not summarised here. They have instead been summarised as part of individual site summaries.</p> <p><u>General Comments on Housing Land Supply</u></p>		

### Housing Supply Target and Housing Land Requirement

01391 (Homes for Scotland (HfS)) – are of the view that the Housing Supply Target (HST) should have been reviewed especially in context of the reviewed SPP published after the LDP 2014 examination. The Housing Background paper suggests that the current HST is in conformity with SPP 2014. HfS states this is not true because SPP was published after the last proposed plan. The MIR should have presented options for discussion and debate around the HST. The forthcoming proposed plan should fully explain why such a low HST has been set as it should be considerably higher. Full justification for it being so far below the need and demand evidenced in the HNDA is not provided. The proposed plan should contain an up to date and relevant HST that is the result of policy considerations undertaken in the context of paragraph 115 of SPP. In addition to this, the house building industry is reporting increased activity in terms of completions, sales and the number of active sites. Further consultation on the HST should take place in advance of publication of the Proposed Plan.

Housing Land Requirement – HfS consider that the generosity margin added to the LDP HST should reflect the degree of certainty as to the deliverability of the housing land supply that has been identified to date. If an area has a strong track record of achieving its HST, there is an argument for a generosity margin of 10-20%. However, under-achieving areas should employ a 20% generosity margin. The generosity margin should not be limited by the pool of known potential housing land that the Council would be content to allocate. HfS's reading of SPP is that a generosity margin and resulting HLR should be decided upon before land is sought to fulfil that requirement. The Council's background report seems to suggest that the Council has determined the generosity margin on the basis of what land is considered to be suitable for allocation. HfS notes that historically, there has been a history of underperformance when compared with the targets.

HfS points out that larger sites such as Durieshill have consistently failed to deliver sites as programmed through the housing land audit. Such delivery shortfalls cannot be sustained and a higher level of generosity is required to achieve change needed. More releases in the more marketable areas of Bridge of Allan, Dunblane, Cambusbarrow and Doune would assist better than adding to allocations in the eastern villages. Indeed it is suggested that allocations in the eastern villages are replaced with sites being identified in these more marketable areas. No specific sites are, however, mentioned for deletion or inclusion.

HfS further state that the Council should use the housing land audit process, and information provided by the home building industry and other parties to anticipate and plan in advance for shortfalls in the effective land supply rather than reacting once a shortfall has occurred. This would remove the requirement to request detailed planning applications and restrict planning consent durations.

01179 (Hallam Land Management and CEG) and 01577 (Holder Planning) state that the Housing Supply Target (HST) is not based upon the results in the HNDA as they greatly underestimate affordable housing need. The MIR does not properly explain that the HST is being suppressed to such a great extent. The MIR does not recognise the relationship between the provision of market housing and the delivery of affordable housing. Providing more market housing means a more plentiful supply will reduce house prices and planning policies require the associated provision of 25% affordable housing. There is also concern that the MIR does not recognise that the suppression of housing land provision will have a significant negative economic impacts and they are unhappy that the HST is not a matter for consultation in the MIR. Lack of transparency in the MIR to explain the significant extent to which the HST has been reduced compared to the actual housing need and demand identified in the HNDA. Disagree that a higher HST could have damaging impacts on the Stirling area. Additional housing releases could be made without significant harm to

the cultural and natural heritage of the area. Suggest that a site at Polmaise Road, Cambusbarron is taken forward in the proposed plan to assist in meeting the under allocation of land. SPP states that the local development plan should set the HST. The Proposed Plan should therefore reassess the HST and make that assessment subject to consultation through the MIR process. If it doesn't, it is contrary to SPP 2014. The MIR contains an illogical and damaging strategy which responds to a shortage of affordable housing by further constraining the supply.

SLDP\_188 (The Scottish Government) The housing section of the MIR was clear in setting out the housing supply target and describing how the housing land requirement, including a generous margin, could be met in the Proposed Local Development Plan (LDP). This was supported by the use of clear tables and graphics which helped display the housing options to the reader.

The MIR did not mention of the specifics of an affordable housing policy or developer contributions towards affordable housing in the MIR. We are aware that policy 2.2 of the adopted LDP requires a 25% contribution for affordable housing, rising to 33% within the Highly Pressured Areas. SPP states that contributions should generally be no more than 25%.

SLDP\_126 (Scottish Water) state that they are funded to provide growth at their Water and Waste Water Treatment Works therefore cannot state a preference for where development takes place. They will, however, endeavour to provide as much information as they can on proposed bid sites as early as possible to allow the Planning Authority to make informed decisions.

#### Gypsy Travellers and Travelling Showpeople

SPP states that development plans should address the need for sites for Gypsy/Travellers and Travelling Showpeople with LDPs identifying suitable sites for these communities. It was unclear from the MIR whether there are any issues of need in the Stirling area as no mention is made of these groups.

00711(SNP group) rejects the assessments carried out for the plan. They are of the view that the current adopted LDP 2014 contains sufficient housing land and that affordable housing should be priority. An over-reliance on Durieshill and south Stirling in general was noted.

01410 (David Wright) – states concern that Kippen has seen 3 major developments in the past 11 years and the town cannot accommodate these adequately in terms of access, traffic and parking. There has also been a lack of affordable housing in the town, something that the Scottish Government is pushing for.

#### MIR 1.1

Agree with MIR 1.1 – 01672, SLDP\_327, 01644, 01547, 01639, 01638

SLDP\_350 (Gladman Developments) supports the site assessments particularly in relation to Barbush, Dunblane but is of the view that a wider site at this location could be developed for housing purposes.

Disagree with MIR 1.1 – 01486, 01665, SLDP\_1068, 01664, 01140, 01671, 01670, SLDP\_1109, 01667, 00105, SLDP\_00136, 01673, SLDP\_272, SLDP\_1139, SLDP\_263, 01508, SLDP\_230, SLDP\_1398, SLDP\_70, SLDP\_321, SLDP\_48, 01581, 01649, 01648, 01645, 01643, 01642, 01641,

SLDP\_151(Network Rail) – disagree due to matters relating to the rail network, more specifically the level crossing at Cornton and proposals for a road bridge to replace this. See site STR009 for more details. Also see site STR10 Broadleys Farm as concerns are stated regarding this site.

01606 (Cala Homes), 01396 (Westpoint Homes) and 01592 (Miller Homes) disagree with MIR1.1. It is stated that sites have not been fully assessed in the SEA and that MIR site assessment does not utilise the scoring system set out in the Environmental Report. This prevents a high level comparative assessment of the proposed as well as existing allocations. The Council will be required to undertake this work for the proposed plan. Site effectiveness has also not been assessed which is a major omission. No engagement with the private sector to clarify where an infrastructure capacity threshold exists and whether it can be addressed through the allocation of a site in the LDP. It is therefore not known if the preferred development strategy has the means to address issues of infrastructure capacity. Market demand has not been taken into account in individual site appraisals despite regeneration having been given status. As a consequence, the Council has not adequately assessed the delivery of its emerging development strategy in terms of selecting sites which can be developed within the plan period to 2027.

#### MIR 1.2

Agree with MIR 1.2 – 01486, SLDP\_1139, SLDP\_263, SLDP\_230, SLDP\_48, 01547, 01606 (Cala Homes), 01396 (Westpoint Homes) and 01592 (Miller Homes) agree that sites which are non-effective should be removed as allocated sites but the Council should explain its methodology for this in its Housing Background Report and continue to apply this to sites in the housing land audit in future.

Disagree with MIR 1.2 – 01664, 01140, 01667, 00136, 01673, SLDP\_327, SLDP\_1251, SLDP\_70, 01581, 01649, 01648, 01643, 01642, 01641,

#### MIR 1.3

**Preference for Option 1** (SLDP\_867, SLDP\_1218, 01498, 01666, 01664, SLDP\_1109, 00105, 01660, SLDP\_1014, 01580, SLDP\_1398, 01645, 01644, 01547, 01643, 01642, 01638,

#### **Preference for Option 2**

**Preference for Option 3** – 01672, 01673, SLDP\_350, SLDP\_1139, SLDP\_263, 01508, SLDP\_230, SLDP\_327, SLDP\_1251, SLDP\_70,

01391 (Homes for Scotland) states preference for Option 3 but states that the Council should reconsider sites rejected through its site assessments to achieve a 20% generosity level.

**Disagree with Option 1** – SLDP\_724 – Option 1 does not identify enough housing land to meet needs. However, instead of supporting Options 2 or 3, Tulloch Homes are of the view that the density of existing sites should be increased to deliver more housing. They suggest more than 800 units should be identified at Stirling South Gateway.

**Disagree with/No preference for Options 1, 2 and 3** – 01486, 01665, 01140, 01522, 01671, 01667, 01606, SLDP\_285, 01479, 01449, SLDP\_321, SLDP\_48, 01581, 01649, 01648, 01641, 01617

01556 (Scottish Enterprise) – no preference for any of the options providing that the Council is satisfied that sufficient housing land is allocated and delivered to contribute to the mix of homes needed in Stirling to support the economic development of the area.

SLDP\_324 (University of Stirling) – no particular preference for any of the options. Do not object to development at Aithrey Kerse, Stirling. However, it must be ensured that necessary infrastructure improvements particularly transportation are delivered. A

masterplan will be required for the area. Nothing other than low rise housing should be developed there.

01553 (Dandara) Would like creation of further option which incorporates a larger release to the south west of Dunblane at Hillside.

Additional Comments relating to MIR 1.3

SLDP\_151 (Network Rail) Concerned about the impact both individually and cumulatively that all Options identified in the MIR could have on Network Rail's infrastructure.

Acknowledges that SG on Developer Contributions requires developers to make a contribution per trip towards rail improvements but it is recommended that the review of the LDP gives further consideration to the need to identify additional rail infrastructure to accommodate the increase in rail patronage from new development. This could include improved signalling and passing loops, car parking, improved access arrangements, cycling facilities, additional ticketing outlets and platform extensions.

Multiple comments on the unsuitability of Airthrey Kerse for development were received in relation to MIR 1.3. Do not agree with Options 2 and 3 as against the development of Airthrey Kerse. There is enough housing land to meet requirements. Including Airthrey Kerse in the LDP is unlikely to help the Council reach housing requirements as there is a good chance SEPA and reporter will throw it back out again. Building should take place on brownfield land not greenbelt.

Generosity Allowance

01606 (CALA Homes), 01396 (Westpoint Homes) and 01592 (Miller Homes) – Generosity should be set at 20% because a) review showed higher rate of transactions therefore potential growth should be encouraged in the future, b) effectiveness has not been factored into site appraisals therefore risk of future allocated sites being non effective is unacceptably high c) the scale of housing allocations has been reduced from an annual build rate of 380 homes for private completions to 328 which artificially inhibits the scale of private housing in the LDP which can be built. If the generosity is set at 20%, this will allow more homes to be built d) the main sites being carried forward by the Council include Stirling South Gateway and Durieshill which continue to be significantly delayed. The prospect of significantly fewer than the 215 units currently programmed being delivered is high and this should be addressed in the adoption of the generosity allowance. In addition, CALA is of the view that the generosity allowance is being added to the shortfall and not the HST which is contrary to SPP. CALA thinks that none of the three options put forward by the Council will deliver the scale of housing necessary over the period to 2027 and from 2028-2037. The Council is using an out of date HNDA and LHS to set a HST; it does not identify the HLR by period from 2010-2027 in accord with SPP and as a result no robust explanation is provided. It also includes an unrealistic assessment of completions contrary to SPP, assumes that all allocations will be built out in full by the end of the plan period to 2027 with no rationale or agreement from HfS. In conclusion, the Council needs to allocate more land in line with SPP. CALA puts forward a site at Bannockburn in this regard, Westpoint Homes puts sites in Bridge of Allan and Strathblane and Miller Homes suggests a site at Barbush, Dunblane.

01617 (CCG) is also of the view that generosity should be set at 20% over the Housing Supply Target and that additional sites should be allocated in the stronger market areas to the north and west of Stirling. It is believed that the effective land supply estimates for sites to the south and east of the city are overly optimistic up to the period 2027. CCG are promoting a site at South Kildean.

01179 (Hallam Land Management and CEG) states that the MIR presents a misconceived understanding of generosity by using criteria more related to setting the housing supply

target than generosity. The purpose of generosity is to add to the supply to make up for the losses that are likely to arise over the plan period. The level of generosity presented is just over the minimum of 10% set out in SPP. This is insufficient. Generosity should be determined by the authority's track record in achieving its target. Those that closely meet their target can justifiably have a lower level of generosity and where targets are consistently not met, generosity levels should be higher.

SLDP\_350 (Gladman Developments) states that generosity should not be affected by the availability of land and the other reasons listed on p33 of the MIR. Gladman would prefer a generosity level of 20% but option 3 goes some way to meet this.

01479 – (Land & Property Holdings) generosity should be higher than Option 3.

#### MIR 1.4

**Agree with MIR 1.4** – 01672, SLDP\_327, SLDP\_1251

**Disagree with MIR 1.4** – 01664, 04410, 01667, 00136, SLDP\_1139, SLDP\_230, SLDP\_1014, SLDP\_70, 01649, 01648, 01645, 01643, 01642, 01641, 01638, SLDP\_48 (Wallace Land & Investment) ask why there aren't three options for the post 2027 period when there three options pre 2027.

01606 (CALA Homes), 01396 (Westpoint Homes) and 01592 (Miller Homes) disagree with MIR1.4 as it is stated that it has failed to properly consider and identify the scale of growth required in the plan period from 2028-2037 in line with SPP. It is therefore evident that substantial land releases in the Core Area are required.

#### MIR 1.5

**Agree with MIR 1.5** – 01672, SLDP\_193, SLDP\_1139, SLDP\_230, SLDP\_1014, SLDP\_327, SLDP\_1251, SLDP\_70, SLDP\_321, 01547,

01556 (Scottish Enterprise) supports preferred housing policy option providing that any proposal which seeks the loss of existing or allocated employment land is fully justified. Scottish Enterprise recommends preparation of Supplementary Guidance to address how such loss could be justified. SE is of the view this can include extensive but unsuccessful marketing, provision of alternative suitable land, contribution towards the provision of essential infrastructure provision which facilitates other land being delivered or land which Key Agencies recommend is no longer required.

SLDP\_175 (SEPA) Agree with the proposed change to policy but is of the view that an additional criterion should be added to reflect environmental constraints e.g. flood risk

**Disagree with MIR 1.5** - 01486, 01665, 01664, 01140, 01667, 00136, 01673, SLDP\_1068, SLDP\_350, 01581, 01649, 01648, 01644, 01643, 01642, 01641, 01606 (CALA Homes) and 01396 (Westpoint Homes) and 01592 Miller Homes disagree with the proposed policy being put forward by the Council which sets out the criteria that new housing developments would need to meet if a shortfall in the 5 year housing land supply is identified. The Council is proposing more criteria over and above those identified in SPP.

01606 (CALA Homes) and 01396 (Westpoint Homes), 01592 Miller Homes, SLDP\_48 (Wallace Land & Investment) and 01391 (Homes for Scotland) are of the view that the Council should not require detailed planning applications as PPP's can easily demonstrate effectiveness and that risk and cost associated with detailed applications on unallocated sites is too high for the development industry. It is pointed out that the Council does not have the power to refuse to accept PPP applications. HfS suggest that the plan could state a preference for detailed applications under the new policy and that early

engagement with the Council should be encouraged. Alternative policy wording is suggested by some linking more directly to the wording of SPP. With regard to the imposition of shorter timeframes for consents, the Council is limited in this respect to those restrictions that are already provided for in legislation.

**No preference MIR 1.5** - SLDP\_263 (Taylor Wimpey) state that the policy should be more flexible in terms of timescales for development sites out with the plan coming forward.

### **Survey Monkey**

MIR 1.1

Agree - 9 Disagree – 26 Don't know/No Opinion - 16

MIR 1.2

Agree – 6 Disagree – 12 Don't know/No Opinion - 28

MIR 1.3

Option 1 – 21, Option 2 – 0, Option 3 – 2, None of the Options – 11  
Don't know – 8, Other - 5

MIR 1.4

Agree – 1 Disagree – 15 Don't know/No Opinion - 25

MIR 1.5

Agree – 2 Disagree – 18 Don't know/No Opinion - 22

### **Stirling Council Response:**

#### Housing Supply Target

Given that there was insufficient time in the LDP timetable to undertake a new HNDA, the Council took the decision to undertake a review of the existing HNDA to establish whether it remained accurate as an estimate of the housing need and demand of the area. The review concluded that little had changed in local housing market dynamics since 2011 which provided reassurance that Stirling's estimate of housing need and demand remains a valid base for the new LDP. The Housing Background Paper that accompanied the MIR examined trends and key changes for both market and affordable housing and concluded that the HST for both continues to be reasonable. The Council does not agree that it was appropriate to review the HST itself as nothing had changed to such an extent that it was deemed necessary to do so. There has been an assertion that the current HST is not in conformity with SPP because SPP was published after the last proposed plan. Again, the Council does not agree with this as the HST can still be assessed against the principles contained within SPP and it can be concluded to be sound even if it was established before the current SPP was published. Other suggestions that the Proposed Plan will be contrary to SPP because the HST has not been consulted on are also refuted.

The Council does not agree with the view that the HST should be considerably higher and that full justification for it being so below the HNDA estimate is not provided. The full explanation for the HST is contained in the Council's Local Housing Strategy (LHS) and was summarised in the housing background paper that sat alongside the MIR. The market housing need and demand identified in the HNDA was in fact inflated to be more optimistic at the request of Homes for Scotland in its translation into the HST. It was the affordable HST only that was reduced because the need identified in the HNDA (700 units per annum for the whole Council area) was not deliverable. SPP is clear that HSTs should be deliverable.

Contrary to the view expressed by HfS, the Council considers that, due to the market HNDA demand figure being increased to reflect an optimistic approach, there is sufficient

flexibility in the HST to deal with the reported increased activity in terms of completions, sales and number of active sites. It is also stated in the MIR Housing Background Paper that household growth has been at the lower end of the assumptions made in the existing HNDA which is likely to limit future completions more than if a high household growth rate was being experienced.

#### Generosity Allowance

The Council does not agree with Homes for Scotland's interpretation of how to apply a generosity margin as there is no guidance at a national level that confirms this as a valid approach. It is noted that HfS does not agree with the Council's place based approach to the identification of a generosity margin. However, the Council is of the view that this is an acceptable approach. The end result is that a generosity margin of between 10-20% is identified in compliance with SPP and that this has been arrived at by ensuring that Stirling as a place has not been compromised which meets with the wider place making aspirations of SPP.

Comments received suggest that the generosity levels being proposed in the MIR are too low and that sufficient housing land should be identified to take the generosity level to 20% especially in the context of a low HST. The Council does not agree with this view as the market HST is already set at an optimistic level and generosity levels are in line with SPP requirements. The Council has also not assumed that all allocations will be built out in full by 2027 as can be evidenced in section 6 of the Proposed Plan under Housing Land where a table clearly shows allocations post 2027.

With regard to comments that land should be released in more marketable locations, such as Bridge of Allan and Dunblane, these areas have been assessed but are limited by school capacities, landscape/greenbelt considerations and other infrastructure constraints. Land allocations consistent with their ability to accommodate development have however been made.

#### Housing Supply Target and Housing Land Requirement

Comments requesting the Council to use the housing land audit process to plan in advance for shortfalls instead of including a policy to deal with situations where a shortfall has occurred are noted. The Council already does this effectively. However, situations do arise where circumstances change and sites do not deliver in the way that was originally envisaged. A policy is required to assess applications that may be received as a result of a shortfall in effective land which may unexpectedly arise. The Scottish Government has been advocating the inclusion of such a policy in emerging development plans. Comments were also received on whether the Council could insist on the submission of detailed planning applications as opposed to Planning Permission in Principle for applications submitted under this new policy. The Council accepts that this would be difficult and has instead stated a preference for detailed applications as opposed to requiring them. Similarly, it has been pointed out that the Council is bound by existing legislation when imposing time restrictions on planning consents. This too is accepted and the policy has been worded accordingly.

#### Affordable Housing

Comments relating to the role that market housing can have in delivering much needed affordable housing were received and it was stated that the MIR did not recognise this relationship. It is reiterated that SPP requires the HSTs within LDPs to be deliverable. If the market housing HST was increased solely in order for the affordable housing policy to deliver more affordable housing and was not related to the ability of the housing market to deliver that amount of housing, the plan would not comply with SPP. In addition to this, affordable housing is largely constrained by Scottish Government grant funding. The current affordable housing HST is directly related to the average amounts of subsidy

received by the Council. A significantly higher affordable housing HST would not be delivered. Whilst the market can provide unsubsidised affordable housing, this is delivered in much smaller amounts across individual developments than that which has been grant funded.

Comments have been received on the proportions of affordable housing being sought in our highly pressured areas (33%) whereas SPP states that this should generally be no more than 25%. Whilst the Council notes this, it is considered that this highly pressured area justifies this higher requirement on account of affordability issues being exacerbated by high levels of housing need, high house prices and few development opportunities.

#### Gypsy Travellers and Travelling Showpeople

Sites for gypsy travellers and Travelling Showpeople is referred to as being absent from the MIR. This is due to the fact that there is an existing site in the Stirling area with no further need being identified through the LHS. Policy 2.3 covers this issue.

#### Site Assessment

Within the Housing Land Supply issue, comments were received regarding the lack of detailed site assessment through the SEA process. It can be confirmed that the updated Environmental Report to be published alongside the proposed plan will assess individual sites.

Whilst effectiveness is not included in the site assessment sheets, it is taken into account in the identification of sites. The housing land audit contains a section on effectiveness which illustrates the commitment the Council has towards ensuring that sites are deliverable. Likewise, if the Council has concerns about infrastructure constraints attached to a site which is potentially being identified in a LDP, the developer will be contacted for clarification if considered necessary by the Council.

With regard to the three options presented in the MIR, there was no clear preference for any one option in those responding in writing. Whilst 17 respondents favoured option 1, the same number either expressed no preference for, or disagreed with, all three options. However, Option 1 was the preference for those taking part in the Survey Monkey. Regardless of responses received, the housing situation within the LDP area has moved on since the publication of the MIR. A planning application for 600 houses at Airthrey Kerse was refused by the Council in March 2016. This has resulted in this site no longer being considered an option. In addition, there have been changes at Dunblane which mean that less houses are being identified at Hillside and more at Barbush. Changes to other sites have also taken place which has meant that some sites have been taken out of the land supply and others added in. This results in a different option to any of those explored through the MIR being taken to proposed plan stage. Detailed reasons for these changes can be found elsewhere in this document under individual sites.

Comments received from Network Rail stating concern about the ability to deliver the MIR options for housing are noted. All Supplementary Guidance will be reviewed and will require to be readopted for the new LDP. Contributions relating to rail infrastructure will be re-examined at that stage.

#### Conclusion

To conclude, the Proposed Plan meets with the provisions of SPP in full. A review of the affordable and market HSTs was undertaken at MIR stage and it is considered that both remain valid. A generous amount of housing land for the period 2015-2027 has been identified which amounts to a housing land requirement of 14.4% over the HST.

In addition to the above, it should also be noted that a change to the plan period has taken place. At MIR stage the housing land was calculated using a plan period of 2010-2027. In this regard, any underperformance against the HST in the years 2010-2015 was added to the period post 2015. The main reason for this was that 2010 was the year on which the HNDA was based. After a review of this approach, it has been concluded that there is no evidence in SPP to suggest that this type of approach is necessary and research of other local authorities has shown that such an approach has not been taken in other planning authorities. This has resulted in the Council following SPPs lead and calculating housing land based on a 2015 start to the plan period as this is the housing land audit that was used as the base. The Centre for Housing Market Analysis, Scottish Government planning officials and Homes for Scotland were all consulted in preparation of the proposed plan and have agreed with this approach.

<b>Ref.</b>	4	<b>WIND ENERGY (MIR2)</b>	
<b>Representations by:</b>			
SLDP_29 – Croftamie Community Council		01486 – Scott Christie	
SLDP_33 – SNH		01498 – Donato Tedesco	
SLDP_62 – East Dunbartonshire Council		01522 – Raymond Bond	
SLDP_89 – Killearn Community Council		01524 – Force 9 Energy	
SLDP_93 – Kippen Community Council		01547 – Jacqueline Edmiston	
SLDP_126 – Scottish Water		01639 – John Gray	
SLDP_132 – Forestry Commission		01640 – Energiekontor UK	
SLDP_160 – Moutaineering Council for Scotland		01641 – Ruth Butchart	
SLDP_175 – SEPA		01642 – Tanja MacLean	
SLDP_178 – sportscotland		01643 – Steven MacLean	
SLDP_188 – Scottish Government		01648 – Kenneth Wooley	
SLDP_322 – Confederation of UK Coal Producers		01649 – Mona Kubiak	
SLDP_682 – Scottish Renewables		01650 – Helen Cormack	
SLDP_1009 – Ruth Burgess		01664 – Sfumnatura Design Studio	
SLDP_1012 – Gillian Allison		01665 – Keith Mackenzie	
SLDP_1068 – David Spooner		01670 – Anthony Ford	
00068 – EDF Energy Renewables		01672 – Karyn Webster	
00105 – Dr. Ian Grieve		01673 – Craig Anderson	
01140 – Linda Galloway		<b>Total No.</b>	38
01323 – Green Power			
<b>Summary of Comments:</b>			
<u>Question MIR 2.1 Spatial Framework</u>			
SLDP_1068 - David Spooner, 00105 - Dr. Ian Greive, 01140 - Linda Galloway, 01498 - Donato Tedesco, 01650 - Helen Cormack, 01641 - Ruth Butchart, 01664 - Sfumnatura Design Studio, 01665 - Keith Mackenzie agree that the Spatial Framework is consistent with SPP.			
01673 - Scott Christie, 01643 - Steven Maclean, 01648 - Kenneth Wooley disagree that the Spatial Framework is consistent with SPP.			
More detailed comments were made by the following respondents:			
SLDP_29 - Croftamie Community Council			
Our only concern is wind farms. Croftamie village is covered by the National Park, however our boundaries are covered by Stirling Council, therefore our concern is wind			

farms on our moors, etc. The villagers were very clear in a previous poll that they did not want them on our doorstep.

SLDP\_33 - Scottish Natural Heritage

The map appears consistent with Table 1 of SPP. However the wide ranging scale of development to which the Spatial Framework applies not considered to be within the spirit of SPP.

SLDP\_62 - East Dunbartonshire Council  
Support the Spatial Framework

SLDP\_89 - Killearn Community Council

We note and welcome intention to restrict the development of wind farms.

SLDP\_93 - Kippen Community Council

Welcome draft revised plan for windfarm development in the Carron Valley catchment. Seems to suggest there is very little room for expansion and any expansion that takes place is likely to be infilling in existing windfarms. We would hope there would not be development in the unspoilt valley between the Fintry and Gargunnoch Hills. We agree with Stirling Council this is an area of exceptional landscape value. Kippen folk would not easily forgive anyone who would support desecration in this wilderness area.

SLDP\_160 - Mountaineering Council of Scotland

Map 2 unclear and appears not to distinguish between Group 1 and Group 2 in the way required by SPP.

SLDP\_175 - Scottish Environment Protection Agency

We agree and welcome the broader discussion in Supplementary Guidance SG33.

SLDP\_188 - Scottish Government

The proposed approach in preparing the spatial framework appears to be consistent with Scottish Planning Policy (SPP).

SLDP\_682 - Scottish Renewables

Support the Council's ambition to become more self-sufficient place through increased local/district heat and power generation provided through renewables. However we have a number of concerns with the draft document. Do not agree spatial framework is consistent with SPP for following reasons:

- i) Recommend including National Parks and National Scenic Areas in areas where wind farms will not be acceptable.
- ii) Recommend wild land definition accords with that provided in SPP, i.e. 'areas of wild land as shown on the 2014 SNH map of wild land areas'.
- iii) The recommended 2.0km maximum community separation distance goes beyond SPP which requires 'an area not exceeding 2km around cities, towns and villages identified on the local development plan with an identified settlement envelope or edge'. Recommend this section is reworded to comply with SPP. Furthermore, the legend in Figure 8 highlights this as a 'buffer'. This goes beyond the requirement of SPP and as such we recommend that the word 'buffer' is removed and the text is changed in line with SPP.

SLDP\_1009 - Ruth Burgess

Ok away from housing

00068 - EDF Energy Renewables and 01524 - Force 9 Energy

- i) The Spatial Framework is not consistent with SPP. It should be made clear this community separation distance is not a requirement for a 'set back' to settlements or individual properties for wind farms in terms of development management. Guidance from the Scottish Government also notes the separation "is not a ban on wind farm

development in the identified area”. Furthermore it is stated that “the community separation distance is not designed to address matters that will be considered at development management stage.”.

- ii) With respect to the Spatial Framework mapping (Map 2) it is considered Group 1 and 2 areas be identified by different colours / shading so the important distinction between both areas can be made. SPP makes clear that wind farm development may be appropriate within Group 2 areas, subject to the specified proviso.

01323 - Green Power

- i) Along with other public consultation events and workshops it may have been helpful to have held a workshop/consultation session with representatives of the renewables/wind industry.
- ii) Community separation distances should be considered on a case by case basis rather than the blanket 2.0 km that has been applied.
- iii) The SNH peat mapping may change with consequential revisions to the Spatial Framework map.

01522 - Raymond Bond

Against all windfarm developments.

01547 - Jacqueline Edmiston

Disagree. There should be tighter controls on where turbines are allowed to be built. They are a blot on the landscape and they are often not even working so how can they be cost effective to build.

01640 - Energiekontor UK

Disagree. Raise two issues. Firstly separation distances to turbines should be reduced to take account of the diverse range of landscape and topography. Secondly, in relation to carbon rich soils and peat, whilst provisional, consider best determined through the planning process and therefore remove from Spatial Framework.

01643 - Steven MacLean

I would prefer to see more hydro installations.

01672 - Karyn Webster

My concern is that the investment and impact on the environment is not adequately reflected in the efficiency and energy production of wind farms and hope this is taken into account when deciding on energy options.

01673 - Craig Anderson

In favour of wind energy. The three developments visible from Stirling are no detriment from the environment. There is scope for some expansion but not extensive.

#### Question MIR 2.2 Minimum Height of Turbines

15 metres SLDP\_1068 - David Spooner, 00105 - Dr. Ian Greive, 01649 - Mona Kubiak, 01547 - Jacqueline Edmiston, 01641 - Ruth Butchart, 01642 - Tanja Maclean, 01664 - Sfumnatura Design Studio, 01665 - Keith Mackenzie, 01670 - Anthony Ford

51 metres SLDP\_1009 - Ruth Burgess

More detailed comments were made by the following respondents:

SLDP\_33 - SNH

The scale of wind energy development the framework is applicable to should reflect wind farm development pressures in Stirling as well having a closer correlation to the definition of commercial wind farm developments in the neighbouring Local Authorities. This is therefore likely to be a greater threshold than 15m to tip height.

SLDP\_160 - Mountaineering Council of Scotland

51.0 metres is too high. Nearby in Perthshire a turbine by Braco (Whistlebrae) is 55.0m to blade tip, but is damaging on account of its unsuitable location and awkward mix of backclothing and skylining. Something around 30-35 m would best reflect transition from domestic/farm scale development to commercial enterprise, and not appear out of line with plantation forestry and pylons. This may be a future aspiration if current study based on 15.0 metre threshold.

00068 - EDF Energy Renewables and 01524 - Force 9 Energy

Considered alternative option, 51 metres, is more appropriate in terms of thresholds and applicability. The Proposed Plan should contain additional guidance on the potential or otherwise to accommodate wind turbines below 51 metres in height which does not form part of the Spatial Framework. It is also not appropriate to provide strategic guidance in the form of a Spatial Framework for turbines under 51 metres. These proposals can be assessed appropriately against LDP development management policies.

01323 - Green Power

SPP needs authorities to identify where there is strategic capacity for wind farms and areas with the greatest potential for wind development. SNH has produced guidance for the siting and design of small scale wind turbine development which the class as between 15.0 to 50.0 m. With this in mind we believe the strategic framework should perhaps apply to medium/larger scale turbines and multiples thereof, e.g. three or more turbines of more than say 50.m tip height.

#### Question MIR 2.3 Preferred assessment criteria

Agree: SLDP\_1068 - David Spooner, 00105 - Dr. Ian Greive, 01140 - Linda Galloway, 01641 - Ruth Butchart, 01650 – Helen Cormack, 01665 - Keith Mackenzie, 01673 - Craig Anderson

Disagree: 01486 - Scott Christie, 01547 - Jacqueline Edmiston, 01648 - Kenneth Wooley

More detailed comments were made by the following respondents:

SLDP\_33 - Scottish Natural Heritage

Agree. However list of criteria should be augmented as suggested in the Alternative Option and recommend reference to 'decommissioning and site restoration'. We also recommend criteria relative to landscape and visual impacts be updated to include 'effects on wild land' to reflect paragraph 169 of SPP.

SLDP\_126 - Scottish Water

Scottish Water would only provide comments on where a windfarm was being constructed if our radio/ satellite communication paths are compromised by the proposed windfarm development. Height of the turbines and cross sectional area of the turbine vane sweep would need to be taken into consideration to ensure no impact on radio communications or telemetry/ SCADA systems. Request any proposals or applications for wind farms are submitted to Scottish Water for review, to allow us to ensure there is no risk to Drinking Water Protected Areas or to the operation of our telemetry systems.

SLDP\_132 - Forestry Commission

Suggest within the third bullet point that woodlands be included, becoming – 'Natural heritage, woodlands, water environment and carbon rich soils'

SLDP\_160 - Mountaineering Council of Scotland

An augmented list is to be preferred, to provide clear guidance to ensure all relevant information is included in planning applications and considered in decision-making.

SLDP\_175 - Scottish Environment Protection Agency

We disagree and consider that additional criteria should be added. Please refer to SEPA response to SG33 (our ref: PCS/140136, 3 July 2015).

SLDP\_178 - sportscotland

Disagree. The listed criteria reflect important considerations in assessing wind energy proposals however sportscotland would request the inclusion of additional criteria including reference to the impacts on tourism and recreation as supported by paras 157 and 169 of SPP.

SLDP\_322 - Coal Pro

The following statement should be added to the assessment criteria.

'In addition the positioning of wind turbines should not sterilise any mineral deposits which might be economically and strategically important to the area or to the UK.'

SLDP\_682 - Scottish Renewables

We broadly agree with the assessment criteria set out in Policy 12.1 but consideration should be given to 'net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities'.

01323 - Green Power

- i) The Wind supplementary guidance (SG 33) has an identical list of criteria, and says these are of particular relevance, implying other matters may also be of relevance. Draft policy 12.1 cross refers to SG 33 but it is unclear if this is an acceptable approach or whether the policy should be all embracing.
- ii) Standard conditions/planning obligations should not be included as criteria in the policy, they should be included in the supporting text.
- iii) Social and economic benefits should be added as specific criteria

01640 - Energiekontor UK

Should include the following: net economic impact, including local and community socio-economic benefits such as employment, associated business, community ownership and supply chain opportunities.

Question MIR 2.4 Policy 12.1 wording

SLDP\_33 - Scottish Natural Heritage

We agree with the updated wording suggested for Policy 12.1, but specific wording will be subject to our response in relation to MIR 2.1 and MIR 2.2 above, particularly in relation to scale of development at (a) (i). Also, in relation to SG 33 and Landscape Sensitivity and Capacity Study for Wind Energy Development (2015) at (a) (iv) and (v).

SLDP\_160 - Mountaineering Council of Scotland

A qualified 'yes' subject to our response to MIR2.3 favouring an augmented list of criteria.

SLDP\_188 - Scottish Government

The wording of the policy appears to reflect the requirements of SPP.

SLDP\_1012 - Gillian Allison

The real value of a windfarm should be assessed in addition to your criteria, i.e. set up, build costs, running costs, life expectancy, dismantling and general efficiency. I do not believe these are eco-friendly if really and honestly assessed.

01323 - Green Power

Drafted policy is quite long and perhaps unwieldy. Could be split into two policies, one dealing with the Spatial Framework and the second development management policy. Items a(ii) and a(v) should be consigned as supporting text and a(i) amended to exclude the first sentence.

**Stirling Council Response:**

In February 2016 the Council adopted Supplementary Guidance SG33 - Wind Energy Developments - Spatial Framework and Supplementary Advice and Guidance. This includes a Spatial Framework for Wind Energy Developments deemed to comply with the requirements of Scottish Planning Policy, and identifies:- Group 1: Areas where wind farms will not be acceptable; Group 2: Areas of significant protection and Group 3: Areas with potential for wind farm development. It also incorporates advice and guidance on a range of planning and environmental considerations relevant to wind energy development. Prior to the adoption the Scottish Government were consulted on the finalised version of SG33. A response was received which stated it was not proposed to issue a 'call-in' Direction and that, accordingly, the Council may proceed to adopt. As highlighted in the MIR, it is a requirement of SPP for Spatial Frameworks to form part of the Development Plan. A draft version of the SG was also subject to extensive public consultation, carried out in accordance with established practice and procedures and involving a full range of stakeholders, including community councils, other interested community groups, the Scottish Government, Key Agencies, the development industry and the wider public.

With the above in mind the following responses are made to the above comments:-

Question MIR 2.1 Spatial Framework

Supporting comments are noted.

The Spatial Framework is deemed to comply the requirements of the SPP and has already been the subject of full public consultation. Notwithstanding the comments received the Council is not in a position to modify the extent of Group 1, Group 2 or Group 3 areas. With reference to the Spatial Framework mapping:

- i) in relation to the community separation areas it is agreed the term 'buffer' is inappropriate and the mapping will be amended.
- ii) It is acknowledged carbon rich soil mapping has still to be finalised, and is identified as 'provisional'.

Question MIR 2.2 Minimum Height of Turbines

Supporting comments are noted.

Policy 12.1 confirms that the spatial framework applies to wind energy developments of 15m or more to blade tip. This approach reflects the environmental sensitivities of the Stirling LDP area and has not been challenged by the Scottish Government.

Question MIR 2.3 Preferred assessment criteria

Supporting comments are noted.

These considerations are derived from SPP which notes: ' Considerations will vary relative to the scale of the proposal and area characteristics ..... (para 169)' Having taken account of the comments received the Council remains of the view there is no need for the list to be expanded.

Question MIR 2.4 Policy 12.1 wording

Supporting comments are noted. In response to comments by 01323 - Green Power  
The Council also considers the policy wording to be a reasonable compromise between  
the need to provide sufficient detail to allow the reader to be aware of the intention and  
purpose of the policy whilst at the same time making use of plain language.

Ref.	5	FLOOD RISK MANAGEMENT (MIR11)
<b>Representations by:</b>		
SLDP_33 - SNH	01592 - Miller Homes	
SLDP_126 - Scottish Water	01606 - Cala Homes (West)	
SLDP_132 - Forestry Commission	01641 - Ruth Butchart	
SLDP_175 - SEPA	01642 - Tanja Maclean	
SLDP_188 - Scottish Government	01643 - Steven Maclean	
SLDP_324 - University of Stirling	01648 - Kenneth Wooley	
SLDP_1012 - Gillian Allison	01650 - Helen Cormack	
SLDP_1068 - David Spooner	01660 - Jean Hutton	
SLDP_1218 - Linda Hamilton	01662 - Kate Fuller	
SLDP_1398 - Philip Leeks	01663 - David Parkinson	
00105 - Dr. Ian Greive	01664 - Sfumnatura Design Studio	
01140 - Linda Galloway	01665 - Keith Mackenzie	
01396 - West Point Homes	01666 - Inga Bullen	
01522 - Raymond Bond	01672 - Karyn Webster	
01547 - Jacqueline Edmiston	01678 - Mr. and Mrs. Craig	
01580 - David Philp		
	<b>Total No.</b>	<b>31</b>
<b>Summary of Comments:</b>		
Following respondents agree with preferred policy approach: SLDP_33 - SNH, SLDP_132 - Forestry Commission, SLDP_1012 - Gillian Allison, SLDP_1068 - David Spooner, SLDP_1218 - Linda Hamilton, SLDP_1398 - Philip Leeks, 01522 - Raymond Bond, 01641 - Ruth Butchart, 01648 - Kenneth Wooley, 01660 - Jean Hutton, 01662 - Kate Fuller, 01663 - David Parkinson, 01664 - Sfumnatura Design Studio, 01672 - Karyn Webster, 01678 - Mr. and Mrs. Craig		
The following respondents disagree with preferred policy approach: 000105 – Dr. Ian Greive, 1547 - Jacqueline Edmiston, 01650 - Helen Cormack		
More detailed comments were made by the following respondents:		
SLDP_126 - Scottish Water Sewers for Scotland 2nd edition (SFS2) has been superseded by Sewer for Scotland 3rd edition (SFS3) and Primary Policy 5 should be amended accordingly.		
SLDP_175 - SEPA Agree, but have detailed comments in respect of Primary Policy 5.		
i) Generally support policy as it provides a comprehensive framework for decision making in accordance with national flood legislation and planning policy guidance and is also a climate change adaptation measure. However we require policy coverage to ensure:- a) a precautionary approach is taken to flood risk from all sources taking account of the predicted impacts of climate change, b) development is avoided in locations at medium to high flood risk (unless it accords with the risk framework in paragraph 263 of SPP) or where it would lead to an increase in the probability of		

flooding elsewhere, c) Flood Risk Assessment (FRA) is required for all developments at risk of flooding from any source in medium to high risk areas and developments in low to medium risk areas identified in the risk framework (i.e. developments located in an area at the upper end of the probability scale, essential infrastructure and the most vulnerable land uses). The flood risk assessment should be undertaken in accordance with SEPA technical guidance.

ii) We require that:

- a) references to 'the Indicative River and Coastal Flood Map (Scotland)' and updated to refer to 'the SEPA Flood Maps';
- b) that 'Scottish Planning Policy (Feb 2010)' is modified to 'Scottish Planning Policy (2014);
- c) that reference to 'appropriate finished floor levels, should be utilised' should be taken out as this is no longer within SPP; and
- d) recommend reference is made to the SEPA Guidance 'Land Use Vulnerability Guidance'.

With reference to Policy 5.1: Reinstate Natural Watercourse we support the policy wording in the opening sentence includes the protection and improvement of the water environment, but recommend this is modified to also include the re-naturalisation of watercourses.

SLDP\_188 - Scottish Government

We agree that the addition adequately safeguards land that can contribute towards natural flood management.

Other Issues

- i) Policy 5 (b) should be revised to reflect SEPA's replacement flood maps - January 2014.
- ii) Paragraph 260 of the SPP states that development plans should use Strategic Flood Risk Assessment (SFRA) to inform choices about the location of development and the policies for flood risk management. It was not clear in the MIR or background papers whether such an assessment has been carried out. We do note that you have undertaken a site assessment process following the call for sites which has considered flood risk alongside a range of other factors. We would therefore welcome confirmation within the Proposed Plan of whether SFRA has been used.
- iii) The policy approach in the Proposed LDP should accord with the flood risk framework as set out in the SPP 2014.
- iv) We wish to make you aware that Scottish Government has recently published planning guidance on flood risk that the Council should take into account when preparing the Proposed LDP.

SLDP\_324 - University of Stirling

The University is a private landowner with responsibilities under the Reservoirs Act for two water courses - Airthey Loch and Waltersmuir Reservoir. The University would expect there to be careful and thorough analysis of the use of Airthey Loch for flood attenuation in relation to any local development and would not support any proposals which might increase flood risk or make the University's responsibilities under the Reservoirs Act more onerous or costly.

01140 - Linda Galloway

Disagree – It seems that even SEPA will back down under pressure.

01396 - Westpoint Homes, 01592 - Miller Homes, 01606 - CALA Homes West

The proposed policy amendment may classify developments as ... '*inappropriate development*,' precluding development within these areas which could enhance the

management of flood risk. We recommend that the policy wording is modified and the following wording is deleted '*...from inappropriate development or changes of use.*'

01642 - Tanja Maclean

Agree. I don't think this is taken serious enough. Just look at the rain we had on Tuesday 6 October. It brought Stirling to a standstill. These types of rain storms are happening more and more.

01643 - Steven Maclean - Agree. Whilst Airthey Kerse is being proposed as a site for development, this area is a flood plain. I can't see nor understand how this can be considered in the plan.

01665 - Keith Mackenzie

Additional criteria a good idea, but don't think the MIR contains enough information to determine if this will 'adequately' safeguard to prevent flooding.

01666 - Inga Bullen

Safeguarding land that can contribute towards natural flood management should be a major priority as the economic pressures to build on this land are high.

**Stirling Council Response:**

The MIR highlights that SPP has introduced an additional requirement that local development plans should protect land with the potential to contribute to managing flood risk, for instance through natural flood management, managed coastal realignment, washland\* or green infrastructure creation, or as part of a scheme to manage flood risk, and proposes, as the preferred policy approach that additional criterion be added to this effect to Primary Policy 5: Flood Risk Management.

Comments in support of the preferred policy approach is noted. A number of respondents disagreed without providing any further supporting information. With reference to the comments of the Scottish Water and SEPA relevant aspects of Primary Policy 5 have been amended.

In response to 01396 - Westpoint Homes, 01592 - Miller Homes, 01606 - CALA Homes West the Council accepts that development on 'appropriate land' could, potentially, enhance the management of flood risk. However the Council remains of the view proposed wording rightly emphasises the precautionary approach of flood risk management.

Several comments relate are specific to the proposed housing site option at Airthery Kerse and the matters raised are addressed separately that response.

<b>Ref.</b>	6	<b>HOUSING IN THE COUNTRYSIDE (MIR8)</b>
<b>Representations by:</b>		
SLDP_102 - Strathblane CC	01522 –Raymond Bond	
SLDP_126 – Scottish Water	01547 –Jacqueline Edmiston	
SLDP_188 – Scottish Government	01592 –Miller Homes	
SLDP_192 - Warren Consultants	01606 –Cala Homes (West)	
SLDP_193 – TACTRAN	01639 –John Gray	
SLDP_256 –Stafford Trust	01641 –Ruth Butchart	
SLDP_1009 – Ruth BURGESS	01642 –Tanja MacLean	
SLDP_1012 –Gillian Allison	01643 –Steven MacLean	

SLDP_1068 –David Spooner 00105 –Dr Ian Grieve 00327 - Alexander Ellis 01140 –Linda Galloway 01305 –Eileen Gallacher 01369 –Houghton Planning Ltd	01648 –Kenneth Woolley 01650 –Helen Cormack 01665 –Keith MacKenzie 01672 –Karyn Webster
	<b>Total No.</b> 26

**Summary of Comments:**

Agree with 8.1

SLDP\_102 Strathblane CC; SLDP\_193 TACTRAN; SLDP\_1068 David Spooner; 00105 Dr Ian Grieve; 00327 Alexander Ellis; 01305 Eileen Gallacher; 01547 Jacqueline Edmiston; 01639 John Gray; 01642 Tanja Maclean; 01642 Steven MacLean; 01672 Karyn Webster all express agreement that the southern area of the LDP should be considered 'pressured and easily accessible' to reflect the SPP definition and therefore require amendments to Policy 2.10.

In doing so, 01305 Eileen Gallacher raises concerns that the southern area of the LDP is at risk of expanding 'by stealth' in the countryside, with villages in this area losing their uniqueness and putting added pressure on amenities and utilities. SLDP\_193 TACTRAN state that restricting housing in the countryside will encourage development within settlements, which can more readily be served by public transport and linked to cycling and walking networks. 01639 John Gray states that all policies should be consistently applied to prevent developers pushing for approval in undesirable cases.

Disagree with 8.1

SLDP\_192 Warren Consultants; 01140 Linda Galloway; 01369 Houghton Planning Ltd; 01522 Raymond Bond; 01592 Miller Homes; 01606 Cala Homes (West); 01648 Kenneth Woolley all indicate that they disagree.

In doing so SLDP\_192 Warren Consultants raises questions as to whether villages in Stirlingshire are either pressurised or can be considered as commuter settlements. Provides the example of Buchlyvie, which it is argued has very little incidence of commuting to Stirling or beyond. 01369 Houghton Planning Ltd challenges the Housing Land figures relative to small sites (40 units per annum) should a more restrictive policy be introduced.

8.2 answered yes

SLDP\_1068 David Spooner; 01592 Miller Homes; 01606 Cala Homes (West); 01642 Tanja MacLean; 01643 Steven MacLean; 01648 Kenneth Woolley all give support to an alternative policy option which would seek to amend the interpretation element of the policy, and look to tighten the definition of Building Groups. (SLDP\_1068, 01642 & 01643 intentions unclear – answer positively to both questions)

SLDP\_102 Strathblane CC state that as a default position they would support the clarification and tightening of the policy definition and guidance relative to Building Groups and Infill should the MIR preferred option be rejected.

8.2 answered no

SLDP\_193 TACTRAN; 00327 Alexander Ellis; 01140 Linda Galloway; 01369 Houghton Planning Ltd; 01639 John Gray; 01641 Ruth Butchart; 01650 Helen Cormack; 01672 Karyn Webster all state that they do not agree with the alternative policy option.

In doing so SLDP\_193 TACTRAN state that allowing housing in the countryside will encourage dependency on the private car and reduce potential for the use of alternative

modes of transport, whilst 01140 Linda Galloway states that housing in the countryside requires integrated transport infrastructure as not everyone has transport.

00327 Alexander Ellis considers that the alternative would constitute a risk to the future maintenance of existing countryside boundaries around villages in the LDP south area due to their proximity to Glasgow.

#### Keep Policy as is

SLDP\_192 Warren Consultants and 01369 Houghton Planning Ltd argue instead that the current Policy should remain in place, and what is needed is a review of consistency of decisions, and/or review of guidance and interpretation rather than a review of the Policy itself.

Whilst accepting that the southern area of the LDP can reasonably be defined as 'pressured and easily accessible' SLDP\_256 Stafford Trust argue that the policy should remain as is, as it provides opportunities for small scale expansion of housing groups in the countryside.

#### Wording of Policy

SLPD\_188 Scottish Government query whether it could be inferred from the proposed policy wording relative to part(a)(i) that occupancy conditions may be used, and which SPP states should generally be avoided.

#### Green Belt

SLPD\_102 Strathblane CC and 01305 Eileen Gallacher give support for the continued restriction of housing development within areas of Green Belt, whilst SLDP\_1009 Ruth Butchart states that Green Belt land should only be developed as a last resort.

#### Request for Ruskie to be identified as a Settlement

01369 Houghton Planning Ltd request that the properties as Ruskie be defined as a Settlement within the plan, or at the very least 'fast tracked' under SG36: Small Settlements.

#### General Comments

- 1) SLDP\_1012 Gillian Allison states that the right to buy should not be taken away.
- 2) 01140 Linda Galloway queries what has happen to an approach which had brownfield development as preferable.
- 3) 01665 Keith MacKenzie states that housing development should not be considered without appropriate investment in infrastructure.
- 4) SLDP\_126 Scottish Water confirm that their remit does not allow them to state a preference as to where development should take place.

#### **Stirling Council Response:**

As evidenced above, the response was relatively evenly balanced as to whether a change to Policy 2.10 Housing in the Countryside was necessary or desirable.

The 'preferred option' set out in the Main Issues Report (MIR), would in effect remove the opportunity for new residential development within Building Groups or Infill within the majority of the LDP countryside. To date, a significant number of planning applications and approvals have involved development within Building Groups or Infill scenarios, and consequently any such change to the policy would likely have a considerable impact on the level of development opportunities available, and housing numbers experienced.

Of those that extended their support to the 'preferred option' many cited concerns regarding the scale of development experienced through the policy and its impact on; the

character of the countryside; the setting of settlements; services and transport provision; as well as expressing concern as to the potential impact should the policy remain unaltered.

Amongst those that did not support a change to the policy, there was a degree of congruence in some comments regarding the opportunity to consider reviewing the associated interpretation and guidance relative to the existing Policy - should there be concern as to some of the impacts experienced under it.

In recognition of the fact that housing in the countryside makes a significant contribution to providing a range of housing opportunities through the Plan area, and helps maintain a generous supply of housing in accordance with SPP, it is proposed that no amendments to the existing policy are made. However, in order to address concerns regarding some of the impacts of the policy and scale and rate of development experienced, it is considered appropriate to review the interpretation and siting guidance contained within SG10: Housing in the Countryside. This will be carried out Summer/Autumn 2016 and will be published for consultation thereafter.

#### Ruskie

Due to the limited scale and size of Ruskie, it is not considered appropriate to define it as a Settlement for the purposes of the Proposed Plan and Spatial Strategy. Equally, given the above, and in particular the intention to continue with a Policy which promotes opportunities within Building Groups, it is not considered necessary to accede to the request to 'fast track' its designation as a Small Settlement.

#### General Comments

- 1) The proposed Policy would have no impact on 'Right to Buy';
- 2) The Spatial Strategy contained within the Proposed Plan does direct the majority of new development to existing towns and villages, including where possible identifying appropriate Brownfield sites. However, in accordance with SPP, the Proposal Plan is also required to allow for residential development opportunities within the countryside.
- 3) Comments are noted, SG10 makes clear that where necessary development will be expected to contribute to necessary infrastructure such as transport, affordable housing and education.
- 4) Noted.

<b>Ref.</b>	7	<b>ALLAN LODGE, BRIDGE OF ALLAN (BOA08)</b>	
<b>Comments by:</b>			
SLDP_126 – Scottish Water		01536 – Jeremy Atkinson	
SLDP_932 – Catherine Lafferty		01557 – Dr I Jenkins & Dr J Valentine	
SLDP_1012 – Gillian Allison		01578 – Chris Waring	
SLDP_1218 – Linda Hamilton		01587 – Fiona Atkinson	
00430 – James Weldon		01621 – Meg Jackson	
00504 – Sandra Hayashibara		01622 – Erin Mason	
00654 – Elizabeth Huntly		01628 – Amy Thomson	
01098 – Steven Hamilton		01629 – Rhys Williamson	
01429 – David Shaw		01631 – Amber Slattery	
01444 – John MacDonald		01634 – Courtney Laurel	
01447 – Robert Beveridge		01635 – Beth Leaver	
01470 – Kieran Penny		01662 – Kate Fuller	
01490 – Aileen Penny		<b>Total No.</b>	25

### **Summary of Comments:**

Catherine Lafferty (SLDP\_932), Linda Hamilton (SLDP\_1218), James Weldon (00430), Steven Hamilton (01098), Kieran Penny (01470), Aileen Penny (01490) have submitted comments objecting to the development of a number of sites in Bridge of Allan and Causewayhead/Cornton, raising the following issues: flooding, loss of green belt, capacity of services and infrastructure, views to the Wallace Monument, visual impact of loss of green space.

David Shaw (01429), Sandra Hayashibara (00504) Gillian Allison (SLDP\_1012) Elizabeth Huntley (00654), Jeremy Atkinson (01536), Dr I Jenkins & Dr J Valentine (01557), Chris Waring (01578), Fiona Atkinson (01587) have provided objections specifically to the development of this site. The following issues have been raised:

#### Design and impact on neighbouring properties

New-build development would be out-of-keeping with the surrounding properties in terms of appearance and density; 15 dwellings represents over development of a small site; development, particularly if above two storeys, would be overbearing and overshadow existing properties. Buildings over one storey in height would negatively impact on adjacent properties due to loss of outlook e.g. to Stirling Castle/Wallace Monument/Dumyat, loss of privacy, increase in noise and disruption during construction.

#### Flooding/Drainage/Sewerage

Existing properties will be at increased risk of flooding due to inadequate drainage/sewerage systems and increased water run-off.

#### Traffic and Road Safety

Increase in the volume of traffic would bring increased risk to pedestrians, in particular children walking to and from school. Roads surrounding the site unsuitable for increased traffic as they are narrow and there is a high level of on-street parking. No options for improving existing access or creating additional access in the immediate area.

#### Loss of care facility

The existing care facility is an important part of the community, providing 24 hour short-term/respite care and housing for older people in Bridge of Allan, with convenient access to amenities, which encourages social inclusion; visits to Allan Lodge are an integral part in local school children's educational development. There is a shortage of housing for older people in Bridge of Allan – ranging from people seeking to down-size to smaller properties to less able people seeking sheltered housing of the type offered by Allan Lodge.

Concern was expressed regarding the Council's plans for the occupants and employees of Allan Lodge should development proceed.

John MacDonald (01444) and Kate Fuller (01662) have raised concerns over the proposed density upon the site, taking account of surrounding semi-detached with gardens.

Robert Beveridge (01447) states support for development houses but not for flats.

Scottish Water (SLDP\_126) advise there is adequate water supply and capacity for waste water treatment.

### **Schools**

Seven pupils from Wallace High School commented on the site at an engagement session held with 4<sup>th</sup> and 5<sup>th</sup> year students on Thursday 8 October 2015.

Six pupils – Meg Jackson (01621), Erin Mason (01622), Amy Thomson (01628), Amber Slattery (01631), Courtney Laurel (01634), Beth Leaver (01635) – do not support the development of the site, citing the size of the site; its poor accessibility and the impact of closing the care home. One pupil supported development of the site – Rhys Williamson (01629).

Overall, 10 pupils did not support development of this site, 4 did not know or had no view, while 5 pupils did support development.

### Drop-in Sessions

6 - Do not support development on the site

1 - Unsure

3 - Support development on the site

### Stirling Council Response:

The current use of Allan Lodge Care Home is to provide a combination of long term and short stay assessment services for older people. The model of care adopted within Allan Lodge has developed towards the provision of short stay assessment services as part of the overall Reshaping Care for Older People agenda within the Stirling Council area, whereby there is a focus on re-ablement and recovery, supporting people to live in their own homes wherever possible.

The Outline Business Case for the proposed Stirling Care Village on the Stirling Community Hospital Site included the sale of care homes in Balfron, Stirling and Allan Lodge in Bridge of Allan to generate capital receipts and there is an understanding that the short term care services provided within Allan Lodge will move to the Stirling Care Village once established.

However, with Full Business Case approval for the Stirling Care Village Project still to be obtained, there is some uncertainty as to if and when Allan Lodge will cease to provide the services it currently does. There are a small number of long term (permanent) residents of Allan Lodge and no closure strategy has – to date – been required to be established for this service at this time.

In view of this uncertainty, the Proposed Plan does not identify the Allan Lodge site as a housing opportunity.

Notwithstanding this, should Allan Lodge become available in the future, it is considered that the site would be suitable for redevelopment for housing. This would be subject to achieving an appropriate layout and density to protect the residential amenity of surrounding residents; and other established standards for development relating to drainage, access etc.

<b>Ref.</b>	8	<b>OVERARCHING POLICY (MIR3)</b>
<b>Representations by:</b>		
SLDP_33 – SNH		01606 – CALA Homes (West)
SLDP_62 – East Dunbartonshire Council		01639 – John Gray
SLDP_193 – TACTRAN		01642 – Tanja MacLean
SLDP_324 – University of Stirling		01643 – Steven MacLean

SLDP_1012 – Gillian Allison SLDP_1068 – David Spooner 00068 – EDF Energy Renewables 01140 – Linda Galloway 01396 – Westpoint Homes 01522 – Raymond Bond 01524 – Force 9 Energy 01556 – Scottish Enterprise 01592 – Miller Homes	01645 – Fiona Bell 01648 – Kenneth Woolley 01650 – Helen Cormack 01664 – Sfumnatura Design Studio 01665 – Keith Mackenzie 01667 – Laura Currie 01672 – Karyn Webster 01673 – Craig Anderson
<b>Total No.</b>	25

**Summary of Comments:**

TACTRAN (SLDP\_193), David Spooner (SLDP\_1068), **John Gray** (01639), Sfumnatura Design Studio (01664), Karyn Webster (01672) agree the preferred policy approach responds adequately to SPP’s requirement to ensure that a ‘presumption in favour of development that contributes to sustainable development’ is explicit in the LDP and that the need for net economic benefit is considered in the determination of planning applications. East Dunbartonshire Council (SLDP\_62) supports the Council’s approach and Scottish Enterprise (01556) support the preferred policy approach regarding net economic benefit.

SNH (SLDP\_33) agree that the preferred policy approach responds adequately to SPP’s requirement to ensure that a ‘presumption in favour of development that contributes to sustainable development’ is explicit in the LDP.

EDF Energy Renewables (00068) and Force 9 Energy (01524) consider the wording of the Overarching Policy and Sustainable Development Criteria should be amended to recognise that not all aspects of every development will have a positive impact and the appropriate test of the policy should be a judgement on overall acceptability.

**Westpoint Homes (01396) and Miller Homes (01592) do not support the preferred policy approach** as it fails to take into account commercial requirements related to delivering a viable development and the cost of meeting sustainability requirements has not been assessed. Without this balance, it is argued, the Council’s approach to delivering sustainable proposals could render future development proposals non-effective, particularly in regeneration areas where market demand is lower and therefore the ability to finance these requirements will be exposed. **Recommend that the Council continues to use SPP as a material consideration in the determination of development proposals (Paragraph 29) and that the approach to sustainable principles for an individual site needs to be considered on a national basis and not pre-determined by the Council on a local basis. This will avoid Stirling setting sustainability requirements which will render it as a high cost investment area when compared to other councils.**

Linda Galloway (01140), Raymond Bond (01522), Tanja MacLean (01642), Steven MacLean (01643), Fiona Bell (01645), Kenneth Woolley (01648), Helen Cormack (01650), Keith Mackenzie (01665), Laura Currie (01667) Craig Anderson (01673) disagree the preferred policy approach responds adequately to SPP’s requirement to ensure that a ‘presumption in favour of development that contributes to sustainable development’ is explicit in the LDP and/or that the need for net economic benefit is considered in the determination of planning applications. Craig Anderson adds the term ‘sustainable development’ needs to be very carefully detailed. Sustainable development should be pragmatic in supporting development wherever possible and conserving the environment is not about leaving it unchanged but managing it so it provides the maximum output and utility overall.

### Overarching Policy

University of Stirling (SLDP\_324) state the Proposed LDP needs to recognise the functional link between design and sustainable development and reduced carbon footprint. It anticipates working with the Council proactively to assist the University in meeting its climate change obligations.

Suggest the term 'which seek to ensure an area's full potential for electricity and heat from renewable sources is achieved' is amended as 'full potential' raises an expectation that may not be achieved in the Proposed LDP period – objectives must be simple, measurable, achievable and timebound but the definition of 'full potential' and how it can be achieved is unclear. Instead, there could be a commitment to explore and develop as fully as possible all opportunities for electricity and heat from renewable sources.

Gillian Allison (SLDP\_1012) disagrees with the amendment to the Overarching Policy on the grounds that the energy efficiency of generation from renewable sources is overstated, with the potential of money being wasted on systems that don't work to the level claimed. Believes insulation in accordance with government guidance can cause condensation, rot and unhealthy air quality within buildings, leading to future expense.

EDF Energy Renewables (00068) and Force 9 Energy (01524) consider the requirement to conform to the Sustainable Development Criteria is overly restrictive and criterion (a) of the Overarching Policy should be amended instead read: "environmentally acceptability when considered against the relevant Sustainable Development Criteria". Furthermore, certain development may be acceptable as a result of mitigation and design (as set out in SPP) and therefore the policy wording needs to reflect this position.

### Sustainable Development Criteria

SNH recommend that criteria 7 of the Sustainable Criteria be amended to include the promotion of 'access' to the historic, cultural and natural environment to reflect the principles contained in paragraph 29 of SPP.

University of Stirling (SLDP\_324) consider the criteria set out in the Sustainable Development Criteria should be reordered, with criteria 3 (reduction in greenhouse gas emissions), 4 (reduce the need to travel and encourage sustainable travel) and 5 (support zero waste objectives) ahead of criteria 2 (net economic benefit), as these objectives should have greater priority.

EDF Energy Renewables (00068) and Force 9 Energy (01524) propose the following changes:

1. Replace 'Improve' with 'Have an acceptable impact on'.
7. Replace 'Protect and enhance' with 'Have an acceptable impact on'.
8. Replace 'Minimise adverse impacts on...' with 'Ensure adverse impacts on water, air and soil quality are acceptable'.

### **Survey Monkey**

MIR 3.1 - the preferred policy approach responds adequately to SPP's requirement to ensure that the 'presumption in favour of development that contributes to sustainable development' is explicit in the LDP?

Agree – 4

Disagree – 9

Don't know/No Opinion – 20

MIR 3.2 - the preferred approach responds adequately to SPP's requirement to ensure that the need for net economic benefit is considered in the determination of planning applications?

Agree – 4

Disagree – 9

Don't know/No Opinion – 20

**Stirling Council Response:**

Overarching Policy

Support for the update to the Overarching Policy, adding reference to renewable electricity and heat and a stated presumption in favour of sustainable development is noted. A number of respondents agreed that the preferred policy approach responds adequately to SPP's requirement to ensure that a 'presumption in favour of development that contributes to sustainable development' is explicit in the LDP.

Conversely, submissions have been made which do not support the wording of the Overarching Policy, specifically in respect to part (a) and the requirement for new development to demonstrate conformity with the relevant Sustainable Development Criteria and part (c) relating to 'appropriate measures for mitigation of and adaptation to climate change which seek to ensure an area's full potential for electricity and heat for renewable sources is achieved'.

It is also suggested that the Council's approach could render future development proposals non-effective, particularly in regeneration areas and the approach to sustainable principles should be considered on a national basis, not pre-determined by the Council on a local basis to avoid Stirling setting sustainability requirements which will render it as a high cost investment area when compared to other councils.

In response, it is considered that the Overarching Policy and Sustainable Development Criteria are consistent with SPP – which is established as a material consideration in the assessment of all planning applications – and will contribute to making a positive difference and achieving the four planning outcomes which focus on creating a successful sustainable place; a low carbon place; a natural, resilient place; and a more connected place.

In particular, the term 'seek to ensure an area's full potential for electricity and heat for renewable sources is achieved' is taken directly from SPP (para. 155) and as such is considered to be appropriate.

Sustainable Development Criteria

Support for the update to the Sustainable Development Criteria, adding to the reference to the creation of net economic benefit to the area is noted. A number of respondents agreed that the preferred policy approach responds adequately to SPP's requirement to that net economic benefit is considered in the determination of planning applications.

The Council agrees with SNH's recommendation that criteria 7 of the Sustainable Development Criteria be amended to include the promotion of access to the historic, cultural and natural environment to reflect the principles contained in paragraph 29 of SPP. This criterion reads: "Protect and enhance the historic and cultural environments, and the natural environment (including biodiversity and landscape), and responsible access to such environments".

While the order of the criteria is not intended to infer priority, the Council is agreeable to the University of Stirling's suggestion of reordering the criteria to place criteria 3 (reduction

in greenhouse gas emissions), 4 (reduce the need to travel and encourage sustainable travel) and 5 (support zero waste objectives) ahead of criteria 2 (net economic benefit).

With regard to the changes proposed by EDF Energy Renewables and Force 9 Energy to the Sustainable Development Criteria, as stated above, it is considered that the criteria are consistent with SPP. The changes proposed would serve to dilute the intentions of the Sustainable Development Criteria.

Ref.	9	<b>PLAYING FIELDS/OUTDOOR SPORTS FACILITIES (MIR4)</b>	
<b>Representations by:</b>			
SLDP_33 – SNH SLDP_178 – Sportscotland SLDP_188 – Scottish Government SLDP_324 – University of Stirling SLDP_1012 – Gillian Allison SLDP_1218 – Linda Hamilton SLDP_1068 – David Spooner 00105 – Dr Ian Grieve 00136 – Lynsey Ward 01140 – Linda Galloway 01396 – Westpoint Homes 01522 – Raymond Bond 01547 – Jacqueline Edmiston	01592 – Miller Homes 01606 – CALA Homes (West) 01639 – John Gray 01641 – Ruth Butchart 01642 – Tanja MacLean 01643 – Steven MacLean 01648 – Kenneth Woolley 01650 – Helen Cormack 01662 – Kate Fuller 01664 – Sfumnatura Design Studio 01670 – Anthony Ford 01672 – Karyn Webster	<b>Total No.</b>	24
<b>Summary of Comments:</b>			
<p>SNH (SLDP_33) , Sportscotland (SLDP_178), Scottish Government (SLDP_188) Gillian Allison (SLDP_1012), David Spooner (SLDP_1068), Dr Ian Grieve (00105), Lynsey Ward (00136), Westpoint Homes (01396), Raymond Bond (01522), Jacqueline Edmiston (01547), Miller Homes (01592) CALA Homes (West) (01606), John Gray (01639), Tanja MacLean (01642), Steven MacLean (01643), Kenneth Woolley (01648), Helen Cormack (01650), Kate Fuller (01662), Sfumnatura Design Studio (01664) and Karyn Webster (01672) agree that Policy 1.4 should be updated to refer to ‘Outdoor Sports Facilities’ instead of ‘Playing Fields’.</p> <p>Linda Galloway (01140), Ruth Butchart (01641) and Anthony Ford (01670) disagree that Policy 1.4 should be updated to refer to ‘Outdoor Sports Facilities’ instead of ‘Playing Fields’.</p> <p>University of Stirling (SLDP_324) state that the policy fails to address indoor sports facilities therefore does not reflect the likely development needs of the University campus, where the next phase is likely to include indoor as well as outdoor sports facilities. Believes there is a need to consider all sports facilities and not to favour one type of provision over another; the development of sports facilities should be allowed to evolve in response to an overall strategic vision and need. The LDP should not constrain/specify the nature of this development rather support in principle further development.</p> <p>Linda Hamilton (SLDP_1218) states areas need sports facilities but not expensive golf courses built on green belt land.</p>			
<b>Survey Monkey</b>			

MIR 4 - Do you agree or disagree that Policy 1.4 should be updated to refer to 'Outdoor Sports Facilities', as defined by the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013?

Agree – 13  
 Disagree – 3  
 Don't know/No opinion - 17

**Stirling Council Response:**

Support for the update to Policy 1.4 to refer to 'Outdoor Sports Facilities' instead of 'Playing Fields', including from the national agency for sport, sportscotland, is noted. Of the three submissions disagreeing with the preferred option, no reasoning or alternative is provided.

The University of Stirling is correct in the observation that the policy does not apply to indoor sports facilities but is not the case that the plan 'favours' one type of provision over another. The policy simply seeks to safeguard existing outdoor sports facilities in accordance with para. 266 of SPP – it is not applicable to proposals for new facilities (indoor or outdoor). It is not considered that the LDP constrains or specifies the nature of future development of sports facilities.

With regard to the future development of the University campus, the Plan supports the aspirations of the University (see also Issue 100).

<b>Ref.</b>	<b>10</b>	<b>OLD MUGDOCK ROAD, STRATHBLANE</b>	
<b>MIR Ref.</b>	<b>SBL04</b>	<b>Officer:</b>	<b>RC</b>
<b>Representations by:</b>			
SLDP_102 - Strathblane Community Council		01516 - Dr. C.A.J. Ferguson	
SLDP_402 - Robert Burns		01517 - Janice Ferguson	
SLDP_866 - Morag Bell		01520 - Alex Rae	
SLDP_865 - Robin Stevenson		01555 - Mr. and Mrs. George Bell	
SLDP_1319 - Willie Oswald		01571 - Richard Phillips	
01477 - Blair Armstrong		01605 - Neil Douglas	
01488 - Kenneth McColl		01611 - Mr. and Mrs. G. Paterson	
01497 - Dr. Eric Livingston		01614 - Alastair MacIntyre	
01503 - F.A. Strachan		01618 - Jack B MacIntyre	
01514 - J.S. Ferguson			
01515 - Dr. H. Ferguson		<b>Total No.</b>	<b>20</b>
<b>Summary of Comments:</b>			
SLDP_866 - Morag Bell, SLDP_865 - Robin Stevenson, SLDP_1319 - Willie Oswald, 01477 - Blair Armstrong, 01488 - Kenneth McColl, 01497 - Dr. Eric Livingston, 01503 - F.A. Strachan, 01514 - JS Ferguson, 01515 - Dr. H. Ferguson, 01516 - Dr. C.A.J. Ferguson, 01517 - Janice Ferguson, 01520 - Alex Rae, 01555 - Mr. and Mrs. George Bell, 01571 - Richard Phillips, 01605 - Neil Douglas, 01611 - Mr. and Mrs. G. Paterson, 01614 - Alastair MacIntyre, 01618 - Jack B MacIntyre refer to one or more of the following matters:			
i) The site is not appropriate for building development;			
ii) Previously rejected at planning appeal and recent LDP examination;			
iii) Site is within the green belt, preventing development between Strathblane and Milngavie and maintaining identity;			

- iv) Development pressure has not diminished. Issues of countryside and visual impact remain;
- v) The wood to the south is privately owned, so can't be relied on to screen site. Would also overshadow site, resulting in pressure from incoming occupiers to secure its removal and reducing ecological value;
- vi) Higher density development out of keeping with the area;
- vii) Increased traffic, that includes ever larger vehicles, e.g. 4x4's, associated with local farming and equestrian activities, delivery and refuse vehicles, would conflict with increasing use of this narrow, single lane road, with tight bends, especially in darkness and winter conditions, particularly recreational users such as pedestrians, cyclists and horse riders, children walking to school and older residents where the use of a car is not possible. It is far from local school the library, doctor, church, public transport and all local amenities. There is no public transport, nearest bus stop in 0.5 mile away;
- viii) It is below Deil's Craig dam, graded high risk by SEPA. One outflow goes through the field and often causes flooding in the north east corner and on the road;
- ix) Three large houses have been built in Old Mugdock Road despite greenbelt designations;
- x) Site has considerable biodiversity value;
- xi) Adverse effects on views of adjacent properties;
- xii) Precedent would be established.

**SLDP\_102 - Strathblane Community Council**

We support the rejection of this site for the reasons given in the Site Assessment. However, the problem remains that insufficient housing land is identified.

**SLDP\_402 - Robert Burns**

Site SBL04 is suitable for allocation as a residential site and its re-designation from Green Belt to within the Strathblane settlement boundary, based on the following considerations: Removal from the Green Belt will not lead to coalescence. Allocation would 'round off' this part of the settlement given its residential context. Existing defensible boundary treatment will avoid sprawl and strong settlement boundary will remain. On this basis the site can be viewed as an "infill site". Areas directly to the north, west and south of the site are designated as 'countryside' and not contrary to the principle of residential development. Allocation also contribute towards short term housing requirements in Strathblane and Stirling as a whole as set within the adopted Local Development Plan, this consultation MIR and national guidance. The site is effective and deliverable without any undue site constraints. Allocation will help to support the local community facilities, located within close distance, and provide stimulation for new community development with socio-economic benefits. There is easy access to public transport and the community shop. Lighting and access improvements could be made and a 30 mph limit introduced.

**Drop in Sessions**

- 11 – Did not support development of this site
- 0 – Unsure
- 8 – Support development of this site

**Stirling Council Response:**

This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (Ref: SBL04). For the reasons given it was concluded it was not appropriate to identify the site as an 'option' for consideration in the MIR.

Comments received in response to the MIR consultation are summarised above. Comments from SLDP\_402 - Robert Burns generally seek to persuade the Council there are planning considerations of sufficient weight to support the allocation of the site for residential development in the Proposed Stirling Local Development Plan (PSLDP).

Remaining comments support the conclusion of the MIR that the site should not be identified as a housing option.

Spatial Strategy and Housing Land Requirement

This site, in the designated green belt, is proposed for development for 6-8 housing units.

The MIR states the underlying aims of the Spatial Strategy, as set out in the current adopted SLDP, were not being altered in the PSLDP. Having taken full account of all comments submitted in response to the MIR consultation the Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development. In particular the housing land requirement set out in the LDP fully complies with the policy principle set out in Scottish Planning Policy to identify a generous supply of housing land across all tenures, maintaining at least a 5-year supply of effective housing land at all times.

Taking account of the newly identified housing allocation H153 - South of A81 and remaining capacity at identified housing allocation H106 - Campsie Road there therefore is currently no demonstrable need for the PSLDP to allocate any additional housing land in Strathblane/Blanefield.

Other Considerations

Notwithstanding commentary in the supporting submission there remains significant concerns over potential adverse impacts of site development on the moorland fringe setting of the village, which then transitions into the established, but somewhat isolated, low density Moor Road housing area. Potential arrangements for safe and convenient all ability access to village services and public transport links also needs to be clarified. Site is also potentially at medium to high risk from surface water flooding. Potential flood risk associated with the Deil's Craig Dam to the south also requires to be assessed.

Allocation for residential development would also result in further erosion of the green belt, undermining its important role and function, as set out in SG03 Green Belts, in particular, i) to prevent development in the countryside between Strathblane and Milngavie to the south eroding these settlements' separate identities, and ii) to protect the more immediate setting of Strathblane itself.

Other Comments

These have been noted and are addressed by the recommendation not to allocate the site for housing.

<b>Ref.</b>	11	<b>LOW AND ZERO CARBON BUILDINGS (MIR9)</b>	
<b>Representations by:</b>			
01522 – Raymond Bond SLDP_1218 – Linda Hamilton 01666 – Inga Bullen SLDP_1068 – David Spooner 01140 – Linda Galloway 01670 – Anthony Ford 00105 – Dr Ian Grieve 01672 – Karyn Webster		01592 – Miller Homes SLDP_1012 – Gillian Allison SLDP_324 – University of Stirling 01553 – Dandara 01570 – Stirling University Innovation Park 01650 – Helen Cormack 01648 – Kenneth Woolley 01547 – Jaqueline and Alistair Edmiston	

01661 – Jon Cape 01606 – Cala Homes (West) 01396 – Westpoint Homes SLDP_175 – SEPA	01643 – Steven MacLean 01642 – Tanja MacLean 01641 – Ruth Buthchart	
	<b>Total No.</b>	23

### Summary of Comments:

Raymond Bond (01522), David Spooner (SLDP\_1068), Linda Galloway (01140), Dr Ian Grieve (00105), Karyn Webster (01672), Jon Cape (01661), Gillian Allison (SLDP\_1012), Helen Cormack (01650), Kenneth Woolley (01648), Jaqueline and Alistair Edmiston (01547), Tanja MacLean (01642) and Ruth Buthchar (01641), SEPA (SLDP\_126) agree with option presented in MIR.

Linda Hamilton (SLDP\_1218), Inga Bullen (01666) and Steven MacLean (01643) suggest more should be done to ensure that all new buildings are eco-friendly by being low or zero carbon.

Anthony Ford (01670) disagrees with option presented in MIR.

Cala Homes (West) (1606), Westpoint Homes (01396) and Miller Homes (01592) disagree with option presented in MIR and suggest that the Council should not introduce site specific requirements that give rise to higher development costs when compared with other Council's. Concerns that doing so will dampen housing demand.

University of Stirling (SLDP\_324) and Stirling University Innovation Park (01570) raise concern that the additional 5% target may be difficult to achieve given that current Building Standards are already challenging. Suggest that the LDP removes reference to a specific target but still emphasises a commitment to reduce emissions.

Dandara (01553) do not agree with the option presented in MIR. Recognise and support addressing Climate Change but raise concerns that this policy should not be applied through the LDP process and that these issues are more appropriately addressed through Building Standards. Accept that Section 3F of the 2009 Climate Change Act directs Planning Authorities to adopt such policies. Point to other resources such as using heat mapping to co-locate development. Make reference to the recent findings of the Sullivan panel and the need to update Supplementary Guidance and Policy approach.

### Stirling Council Response:

#### Agree with option presented in MIR

Agreement noted.

#### Disagree with option presented in MIR

Note responses disagreeing with option presented in MIR. As noted in some of the submissions the Planning Authority is required by Section 72 of the Climate Change (Scotland) Act 2009 which inserted Section 3F into the Town and Country Planning (Scotland) Act 1997 requiring that:

“A planning authority, in any local development plan prepared by them, must include policies requiring all developments in the local development plan area to be designed so as to ensure that all new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions from their use, calculated on the basis of the approved design and plans for the specific development, through the installation and operation of low and zero-carbon generating technologies.”

A Topic Paper was prepared setting out the discussion around this topic and sets out how the approach identified in the MIR was arrived at.

With regards to Heat Mapping, the Council's Sustainability Team is currently taking forward this research.

Summary

The Planning Authority accepts that the respondents contend that this requirement should not be within the planning remit and that this requirement should sit with Building Standards. However, as the supporting Topic Paper for Low and Zero Carbon Buildings set's out, there has been no change to the requirement in the 1997 or the 2009 Act to include such policies.

<b>Ref.</b>	12	<b>SCHEDULED MONUMENTS (MIR12)</b>	
<b>Representations by:</b>			
SLDP_1068 – David Spooner 01140 – Linda Galloway 01396 – Westpoint Homes 01498 – Donato Tedesco 01522 – Raymond Bond 01547 – Jacqueline Edmiston 01570 – Stirling University Innovation Park 01592 – Miller Homes 01606 – CALA Homes (West) 01613 – Historic Environment Scotland	01617 – CCG (Scotland) Ltd. 01639 – John Gray 01641 – Ruth Butchart 01642 – Tanja MacLean 01643 – Steven MacLean 01648 – Kenneth Woolley 01650 – Helen Cormack 01662 – Kate Fuller 01664 – Sfumnatura Design Studio (01664) 01672 – Karyn Webster 01673 – Craig Anderson		
		<b>Total No.</b>	21
<b>Summary of Comments:</b>			
Historic Environment Scotland (01613) welcome the intention to incorporate a test for 'exceptional circumstances' into Policy 7.1 but have expressed significant concerns over the proposed policy. They note SPP does not distinguish between weight to be attached to adverse impacts either on site or setting of scheduled monuments in the planning process and suggest that the proposed LDP policy is not accordance with SPP as two different tests of exceptional circumstances are set out. Historic Environment Scotland's concerns are summarised as follows:			
<ul style="list-style-type: none"> <li>- The term 'impacts physically' is too broad and not in line with SPP where wording is restricted to an assessment of an 'adverse effect';</li> <li>- The term 'significantly detracts' in relation to setting, is similarly too broad;</li> <li>- The policy differentiates between scheduled monuments and 'nationally important monuments' which are not scheduled however the sole test of exceptional circumstances for direct impacts relates to grant of scheduled monument consent (SMC) which cannot be applied to non-designated sites;</li> <li>- Of the two tests of exceptional circumstances relating to impacts upon setting, it is assumed that the term 'national developments' relates to those defined in the Planning Act. This misses out a critical step in the assessment process whereby when a development is assessed to be adverse, a mitigation hierarchy is applied and then, depending on that process, the test of exceptional circumstances would apply. It is also not clear how the Council could use this policy for major and local developments, as defined in the relevant regulations, as such developments may also have an adverse impact on the setting of scheduled monuments or unscheduled monuments of national importance.</li> </ul>			

Taking account of the above it is suggested that the proposed policy is not capable of effective application. Historic Environment Scotland add it is difficult to see how fixed criteria could apply, given that different circumstances will be relevant for different developments. They recommend that these issues are considered on a case by case basis, an approach that has been accepted in many planning appeal decisions.

Finally, it is recommended that, as a statutory consultee for developments affecting a scheduled monument or its setting, it should be noted that Historic Environment Scotland would be involved in discussions on mitigation for these assets.

David Spooner (SLDP\_1068), Linda Galloway (01140), Raymond Bond (01522), Jacqueline Edmiston (01547), CCG (Scotland) (01617), Helen Cormack (01650), Sfumnatura Design Studio (01664), Karyn Webster (01672), John Gray (01639), Ruth Butchart (01641), Tanja MacLean (01642) and Steven MacLean (01643) think that Policy 7.1 should be changed to refer to 'exceptional circumstances'.

CCG (Scotland) agree that the wording of Policy 7.1 should be changed in line with SPP however, consider the policy should only reflect the SPP wording and not refer to development which is of national significance. It is considered that maintaining the policy wording contained within SPP will provide the important means to test what may be acceptable in the setting of a Scheduled Monument while allowing sufficient flexibility for the merit of differing types of proposal to be assessed during the development management process.

Westpoint Homes (01396), Donato Tedesco (01498), Stirling University Innovation Park (01570), Miller Homes (01592), Kenneth Woolley (01648), Kate Fuller (01662), Craig Anderson (01673) do not think that Policy 7.1 should be changed to refer to 'exceptional circumstances'.

Stirling University Innovation Park state there should not be an exceptional circumstances test as Scheduled Ancient Monuments and Scottish Historic Environment Policy already place strong controls on development. The Proposed LDP should not impose tests on new development when it has been shown that the existing development has been satisfactorily accommodated.

Craig Anderson states a pragmatic approach should be taken and, in order to approve much needed development, Scheduled Ancient Monuments should not be able to prevent development entirely. It shouldn't be assumed that anything should remain completely unchanged.

Linda Galloway (01140), Donato Tedesco (01498), Helen Cormack (01650), Sfumnatura Design Studio (01664), Karyn Webster (01672), Ruth Butchart (01641), Tanja MacLean (01642) and Steven MacLean (01643) agree with the definition of an exceptional circumstance as set out in the preferred option.

David Spooner (SLDP\_1068), Westpoint Homes (01396), Miller Homes (01592), CCG (Scotland) (01617), Kenneth Woolley (01648), Kate Fuller (01662), disagree with the definition of an exceptional circumstance as set out in the preferred option.

CCG (Scotland) state the definition used by Stirling Council, relating to development being of national significance is not reflected within SPP, the Scottish Historic Environment Policy or the guidance, Managing Change in the Historic Environment – Setting and reference only to "national significance" may infer that a proposal must be identified within the National Planning Framework (NPF).

The NPF focuses on national infrastructure projects and cannot reflect all types of planning proposal. If Stirling Council, Historic Environment Scotland and the Scottish Government are firm that the definition of an exceptional circumstance should be defined in LDPs then we would request that reference of "development of national significance" is replaced with "development of regional or national importance". This will allow consideration of what is of regional or national importance to be assessed and determined through the democratic decision making process.

**Survey Monkey**

MIR 12.2 - Do you agree or disagree with the definition of an exceptional circumstance as set out in the preferred option?

Agree – 9

Disagree – 2

Don't know/No opinion – 18

**Stirling Council Response:**

In view of Historic Environment Scotland's concerns regarding the wording of Policy 7.1, in particular the definition of an 'exceptional circumstances', a meeting was held with representatives from Historic Environment Scotland to agree an appropriate form of wording. The outcome of that meeting is that Policy 7.1, part (a) of the proposed plan reads as follows:

- (a) There will be a presumption against development that would have an adverse effect on a scheduled monument or on the integrity of its setting except in exceptional circumstances. The same presumption will also apply to other nationally important monuments.

It is considered that this approach broadly satisfies the wording set out in SPP and the comments received in response to the MIR, supporting the change to Policy 7.1 of the adopted LDP to refer to 'exceptional circumstances', but addresses various issues raised with the preferred option noted in the MIR.

<b>Ref.</b>	13	<b>SOUTH OF A81, STRATHBLANE (SBL06)</b>	
<b>Representations by:</b>			
SLDP_102 - Strathblane Community Council		01396 - West Point Homes	
SLDP_126 - Scottish Water		01477 - Blair Armstrong	
SLDP_132 - Forestry Commission		01458 - Liam Connoly	
SLDP_156 - Rural Stirling Housing Association		01462 - Fiona Murray	
SLDP_192 - Warren Consultants		01483 - S Brady	
SLDP_848 - Mary Brailey		01501 - Graham S. Ogilvy	
SLDP_1319 - W.M. Oswald		01530 - John Duncan	
00476 - William Lever		01537 - Sylvia Armstrong	
00493 - Connie McKenzie		01559 - Helen Kelly	
		01586 - M. Taylor	
		<b>Total No.</b>	19
<b>Summary of Comments:</b>			
SLDP_102 - Strathblane Community Council: No objection in principle to housing allocation. 30 units seems too much, taking account of topography. Wish to be heavily involved in decisions on type of units. Are they to be smaller in size and possibly flatted? Old Mugdock Road and Milndavie Road not suitable as access point, even if junctions			

improved. These roads are congested and heavily trafficked, including HGV's. A new access directly to the A81 should be considered or allow for through traffic from/to the A81 and Old Mugdock Road, both vehicular and pedestrian. The felled woodland should be compensated for by landscaping and planting on the site, and possibly tree planting on some other site. The scheme seems dependent on successful negotiations with neighbours to change their long-standing sewerage arrangements. Flood Risk is an issue now and obviously a serious issue both during and after the construction, in relation to both properties and road users. The comments about a medieval steading are noted.

SLDP\_126 - Scottish Water: adequate water supply. Currently sufficient waste water capacity. There is an existing combined sewer running through north of site.

SLDP\_132 - Forestry Commission: ideal housing site, but also beneficial, and preferable, if trees were replanted.

SLDP\_156 - Rural Stirling Housing Association: agree with overall assessment and note the constraints relative to water, drainage, topography and access which are unlikely to significantly inhibit development. Concur it is a good location for further affordable housing, perhaps including a low cost home ownership component. It is in Phase 2 (2022 – 2027) but would welcome inclusion in Phase 1 (2017 – 2022) should the appropriate circumstances prevail. We also understand that there might be potential to unlock sites constraints by linking it to other potential developments nearby.

**01396 - West Point Homes: Submission supported by a Development Framework, Statement of Effectiveness and Assessment of Housing Land Supply. Site immediately effective, delivering 30 homes over a two year period. Sustainable location with an easy walk to bus services, local services and amenities; within the settlement boundary; visually discreet; opportunity for biodiversity enhancements. SUDS measures will control surface water discharge to greenfield levels. A flood risk assessment will also be carried out. Built form will be aligned along the contours of the site. Accessed will be off A81 where sightlines are achievable, with pedestrian access also provided off Old Mugdock Road. A Transport Statement will be carried out. Capacity exists at both the Primary and Secondary schools to accommodate the pupils of the proposal.**

SLDP\_192 - Warren Consultants, SLDP\_848 - Mary Brailey, SLDP\_1319 - W.M. Oswald, 00476 - William Lever, 00493 - Connie McKenzie, 01396 - West Point Homes, 01477 - Blair Armstrong, 01458 - Liam Connolly, 01462 - Fiona Murray, 01483 - S Brady, 01501 - Graham S. Ogilvy, 01530 - John Duncan, 01537 - Sylvia Armstrong, 01559 - Helen Kelly, 01586 - M. Taylor, referring to one or more of the following matters.

- i) Support housing on SLB-06. As many affordable rented houses as possible to eco-friendly designs;
- ii) Suggested number of houses (30) too high without wholesale urbanisation at this village gateway. Smaller number of mixed housing units set sympathetically in the rural hillside and the surrounding residence could be acceptable to a significant number of villagers;
- iii) Old Mugdock Road unsuitable for vehicular access. It is congested as it is, carries high volumes of traffic and has a grossly sub-standard junction with Milndavie Road. Access from A81 should be investigated, perhaps via a mini-roundabout to slow traffic. Maybe appropriate to consider a one way traffic system. Access has been suggested through the cul-de-sac and garages of Old Mugdock Road;
- iv) House to north, Firleary, owns c. 30 m land;
- v) Milndavie Road have septic tanks and soakaways, and may not wish to connect to mains sewerage;

- vi) Existing drains and streams flow into the site. A hydrological survey should be undertaken;
- vii) Felled woodland a feature of the village and should be partially re-instated, to the benefit of visual amenity and biodiversity;
- viii) Significant loss of amenity to surrounding houses;
- ix) Site is currently a mess and should be the subject of a short term improvement notice.

**Drop in Sessions**

9 – Did not support development of this site

7 – Unsure

10 – Support development of this site

**Stirling Council Response:**

This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR. The site was deemed consistent with the Plan's Vision and Spatial Strategy and, taking account of the findings of the other assessment criteria, it was concluded the site should be promoted for c. 30 housing units and therefore was included in the MIR's Table 6 - Additional Housing Allocation Options 1, 2 and 3.

The majority of the above comments generally support the principle of housing on the site though draw attention to a number of site specific planning, environmental and access considerations.

Having taken full account of all comments submitted in response to the MIR consultation the Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development.

It is therefore concluded it is appropriate to identify the option as a formal housing allocation in the PSLDP, subject to a range of key site requirements addressing, where practicable, the concerns raised in the submitted comments.

At the time of writing (May 2016) it should be noted an established housing developer is progressing with a scheme for 19 houses, with access being taken from the A81.

Ref.	14	<b>EMPLOYMENT DEVELOPMENT (MIR5)</b>	
<b>Representations by:</b>			
SLDP_70 – Kippendavie Group Trust		01547 – Jacqueline Edmiston	
SLDP_175 – SEPA		01556 – Scottish Enterprise	
SLDP_188 – Scottish Government		01639 – John Gray	
SLDP_193 – TACTRAN		01641 – Ruth Butchart	
SLDP_327 – Graham's The Family Dairy		01642 – Tanja MacLean	
SLDP_1012 – Gillian Allison		01643 – Steven MacLean	
SLDP_1068 – David Spooner		01648 – Kenneth Woolley	
01140 – Linda Galloway		01650 – Helen Cormack	
01522 – Raymond Bond		01672 – Karyn Webster	
		01673 – Craig Anderson	
		<b>Total No.</b>	12

### Summary of Comments:

Kippendavie Group Trust (SLDP\_70), Scottish Government (SLDP\_188), TACTRAN (SLDP\_193), Graham's The Family Dairy (SLDP\_327), David Spooner (SLDP\_1068), Linda Galloway (01140), Raymond Bond (01522), Jacqueline Edmiston (01547), Scottish Enterprise (01556), John Gray (01639), Ruth Butchart (01641), Helen Cormack (01650), Karyn Webster (01672), Craig Anderson (01673) agree that Policy 2.5 should be amended in order to support the area's key business sectors, with support expressed for the proposed wording.

Gillian Allison (SLDP\_1012), Tanja MacLean (01642), Steven MacLean (01643) disagree that Policy 2.5 should be amended in order to support the area's key business sectors. Gillian Allison states economic benefit is required whether from the key sectors or others.

Kippendavie Group Trust and Graham's The Family Dairy submit that leisure and tourism and the food and drink sector respectively should be identified as key sectors, referring to the City Economic Strategy. It is stated that the food and drink sector in Stirling is of strategic importance, as recognised by the Stirling Economic Partnership, but is undervalued and has the potential to grow.

Scottish Government and SEPA (SLDP\_175) support the identification of waste management facilities as an appropriate use on allocated and safeguarded employment sites as this will contribute to a positive framework to deliver sustainable management of waste and accords with the guidance in SPP. Scottish Government state consideration should be given to widening this to include sites which have been identified for industry and storage and distribution.

Scottish Government further state that Policy 2.5 should be amended to cover live-work units, micro businesses and community hubs; the LDP should identify any nationally important clusters of industries handling hazardous substances and safeguard them from development which would compromise their continued operation or growth potential; and locate developments which generate significant freight movements on sites accessible to suitable railheads or harbours or the strategic road network.

Scottish Enterprise requests the Council be satisfied that sufficient land is allocated to meet the needs of the business sector in Stirling and that such land is deliverable within the plan period. Considers that the LDP should focus upon supporting innovative mechanisms to secure implementation of essential infrastructure provision to facilitate the delivery of economic development land and associated development.

The following ideas were generated in relation to the question of how the LDP could support existing business sectors in the Stirling area: more regular bus services; free parking; reduced rent/rate levels; building better infrastructure; improving road network; ensuring that all development contributes to the integration of the city and establishing a far more cosmopolitan feel in the city centre that at present.

### Survey Monkey

MIR 5.1 - Do you agree or disagree that Policy 2.5 should be amended in order to support the area's key business sectors?

Agree – 10

Disagree – 2

Don't know/No opinion – 19

**Stirling Council Response:**

Support for the proposed update to Policy 2.5 referencing the area's key business sectors, including from the Scottish Government and Scottish Enterprise, is noted. While economic benefit should be derived from all development, in instances where development is proposed on unallocated sites, it is considered appropriate to focus on key sectors.

Reference is made in the proposed plan (p.26) in the context of the Economic Strategy to the economic which are important to Stirling, namely (but not exclusively) financial and business services, food and drink and technologically advanced manufacturing in areas such as life sciences and software development.

Scottish Government and SEPA support the identification of waste management facilities as an appropriate use on allocated and safeguarded employment sites and Scottish Government state consideration should be given to widening this to include sites which have been identified for industry and storage and distribution. The term 'employment site', however, encompasses sites which have been identified for industry and storage and distribution.

Policy 2.5 has been amended to cover live-work units, micro businesses and community hubs.

There are no nationally important clusters of industries handling hazardous substances within the Plan area.

With regard to developments which would generate significant freight movements, there are no railheads or harbours within Stirling. In respect to accessibility to the strategic road network, it is considered this has been considered in allocation of employment sites in the plan. It is a concern that a statement along the lines of "developments which generate significant freight movements should be located on sites accessible to the strategic road network" could provide justification for the development of non-allocated sites that may be otherwise unsuitable and undermine the plan-led process.

While the Business Space Strategy used to inform the LDP's employment land requirement was completed over 5 years ago, the Council is satisfied that sufficient land is allocated and effective to meet the needs of the business sector in Stirling. Since adoption of the LDP in 2014 there has been only limited uptake of employment land. The LDP Action Programme, alongside other strategies, will seek to facilitate the delivery of economic development, including essential infrastructure provision.

<b>Ref.</b>	15	<b>PROTECTING SPECIAL LANDSCAPES (MIR13)</b>	
<b>MIR Ref.</b>	MIR13	<b>Officer:</b>	RC
<b>Representations by:</b>			
SLDP_33 - Scottish Natural Heritage		01643 - Steven McLean	
SLDP_178 - sportscotland		01648 - Kenneth Wooley	
SLDP_188 - Scottish Government		01650 - Helen Cormack	
SLDP_682 - Scottish Renewables		01662 - Kate Fuller	
SLDP_1012 - Gillian Anderson		01665 - Keith Mckenzie	
SLDP_1068 - David Spooner		01666 - Inga Bullen	
00105 - Dr. Ian Greive		01670 - Anthony Ford	
		01672 - Karyn Webster	

01522 - Raymond Bond 01641 - Ruth Butchart 01642 - Tanja McLean	01673 - Craig Anderson	
	<b>Total No.</b>	19

**Summary of Comments:**

Following respondents agree with preferred policy approach:  
SLDP\_33 - Scottish Natural Heritage, SLDP\_188 - Scottish Government, SLDP\_1012 - Gillian Anderson, SLDP\_1068 - David Spooner, 00105 - Dr. Ian Greive, 01522 - Raymond Bond, 01641 - Ruth Butchart , 01642 - Tanja McLean, 01643 - Steven McLean, 01650 - Helen Cormack , 01662 - Kate Fuller, 01665 - Keith Mckenzie, 01670 - Anthony Ford, 01672 - Karyn Webster

01666 - Inga Bullen  
Agrees, but adds that planning policy must protect special landscapes.

SLDP\_178 - sportscotland  
Agree - SPP states development plans need to identify and safeguard the character of these areas (para 200). sportscotland supports this as wild land is important for sport and outdoor recreation purposes, providing a distinct, and in some cases rare, recreational experience. It is important that only genuine areas of wild land are identified as such and meet with the loose definition of wild land used in the SPP of remoter upland, mountain and coastal areas.

Following respondents disagreed with preferred policy approach:  
SLDP\_682 - Scottish Renewables - Disagree with question MIR 13. Policy 9.1 provides advice and guidance in relation to the assessment of development proposals in 'designated landscapes'. Whilst wild land is recognised as a 'nationally important mapped environmental interest' it is not a statutory designation and as such should not be treated in the way. SNH make this point in their own guidance.

We also believe this section should take account of paragraph 215 of SPP which states that 'in areas of wild land, development may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting design or other mitigation.'

01648 - Kenneth Wooley: Disagree

01673 - Craig Anderson: Disagree. Special Landscapes should only be deemed as such if the loss of them would provide an overall reduction in the utility for the region as a whole in comparison to the benefit of development. Again pragmatism needs to be applied. If an area is deemed as such under local concern, the wider benefit to a developing said site could be lost. This would be at odds with the city centre strategy.

**Stirling Council Response:**

The preferred option in the MIR is to update Policy 9.1 to include specific reference to the requirements of SPP for development plans to identify and safeguard the character of areas of wild land.

The Council notes all comments in support of the preferred option.

In response to the comments made by SLDP\_682 - Scottish Renewables:

- i) The Council acknowledge Scottish Government and Scottish Natural Heritage advice that wild land areas are not a statutory designation.
- ii) Policy 9.2: Areas of Wild Land inserted into the PSLDP states:- '*The Council will seek to protect the character of Areas of Wild Land as shown on the map below. Any*

*development proposed must be able to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.'* The requirements of para. 215 of SPP are thus reflected in the new policy.

In response to the comments made by 01673 - Craig Anderson the wording of Policy 9.2 seeks to balance the need to safeguard wild land areas whilst acknowledging development may be appropriate in some circumstances.

<b>Ref.</b>	16	<b>OTHER RENEWABLES (MIR14)</b>	
<b>Representations by:</b>			
SLDP_33 - SNH		01547 - Jacqueline Edminston	
SLDP_175 - SEPA		01641 - Ruth Butchart	
SLDP_178 - sportscotland		01642 - Tanja MacLean	
SLDP_1012 - Gillian Allison		01643 - Steven MacLean	
SLDP_1068 - David Spooner		01648 - Kenneth Wooley	
00068 - EDF Energy		01661 - Jon Cape	
00105 - Dr. Ian Grieve		01664 - Sfumatura Design Studio	
01140 - Linda Galloway		01672 - Karyn Webster	
01522 - Simon Bond		<b>Total No.</b>	
01524 - Force 9 Energy			
<b>Summary of Comments:</b>			
<p>Following respondents agree with preferred policy approach:  SLDP_33 - SNH , SLDP_178 - sportscotland, SLDP_1012 - Gillian Allison, SLDP_1068 - David Spooner, 00068 - EDF Energy, 00105 - Dr. Ian Grieve, 01140 - Linda Galloway, 01522 - Simon Bond, 01524 - Force 9 Energy, 01641 - Ruth Butchart, 01642 - Tanja MacLean, 01643 - Steven MacLean, 01661 - Jon Cape, 01664 - Sfumatura Design Studio, 01672 - Karyn Webster</p> <p>SLDP_175 - SEPA  Agree, but consider there are other SPP requirements that should be addressed as part of this LDP as per our response to PP12.</p> <p>The following respondents disagreed with preferred policy approach:  01547- Jacqueline Edminston, 01648 - Kenneth Wooley</p>			
<b>Stirling Council Response:</b>			
<p>The preferred option in the MIR is to add additional criteria to Policy 12.2 referring to para. 169 of SPP. The Council notes all submissions in support of the preferred option. Two submissions did not agree though no further grounds were given.</p> <p>The qualified support of SLDP_175 - SEPA is noted. The Council remains of the view planning and environmental interests in relation to renewable energy developments other than wind are sufficiently safeguarded by reference to para. 169 of SPP, which notes: 'Considerations will vary relative to the scale of the proposal and area characteristics...'</p>			

<b>Ref.</b>	17	<b>NORTH OF EASTER CORNTON, STIRLING (STR11)</b>	
<b>Representations by:</b>			
SLDP_932 – Catherine Lafferty		01574 – Douglas and Christine MacFadzean	
01047 – Iain Graham		01267 – Laurence Ewbank	

00711 - SNP 01653 – Alasdair Johnston 01585 – Keith Robb	01613 – Historic Environment Scotland SLDP_327 – Grahams Dairies	
<b>Total No.</b>		10
<b>Summary of Comments:</b>		
<p><u>Flooding</u> (SLDP_932, 01047, 00711, 01585, 01574) The site sits in the flood plain and there is concern that new development will result in flooding issues putting future residents at risk. There is concern that this will worsen due to climate change impacts. It is stated that Airthrey Kerse is a flood plain and water run-off from fields on to Easter Cornton Road has increased substantially since Wallace High School was built and this will get worse if more houses are built on these fields.</p> <p><u>Loss of views/scenic impact</u> (01267, 01653) Concern that housing development at this location would impact on views and scenery currently experienced in this part of Bridge of Allan and Causewayhead.</p> <p><u>Coalescence of Stirling and Bridge of Allan</u> (01047, 01574, 0711) Development of this site would contribute towards to the coalescence of Stirling and Bridge of Allan meaning that both communities would lose their respective unique character.</p> <p><u>Loss of greenbelt</u> (01047, 00711, 01585, 01574, 01267) Against building on and the resulting erosion/removal of, the green belt at this location which separates Stirling and Bridge of Allan. This can lead to coalescence of the two towns which is unacceptable. There are plenty of brownfield sites in the area which can accommodate development. Additional houses are not required or wanted in this area.</p> <p><u>Education Capacity</u> (SLDP_932, 00711) Schools in this area cannot accommodate pupils from proposed new housing on Airthrey Kerse. The education issue is complex and there is an obvious need to explore the sensitivity of any failure to deliver allotted education facilities and the knock on effect that this may have on other areas.</p> <p><u>Health Services Capacity</u> (SLDP_932, 00711) There is insufficient capacity within the health service i.e. doctor’s surgeries, dentists and hospital beds to accommodate further residents.</p> <p><u>Transportation issues</u> (01047, 00711, 01585, 01574, 01267) There is specific opposition from 0711 (SNP) to the building of a link road from Cornton Road to Aithrey Road and traffic impacts of development in this area generally. The transport assessment for STR11 is rejected and concern is stated about the Council’s intention to review transportation policies as there appears to be backtracking from modal shift principles that feature in the transportation assessments in the MIR.</p> <p>In general terms, there are also concerns about transport links and the capacity of the road network to accommodate growth at this location.</p> <p>Traffic levels in this area already put stress on the local road network particularly at peak times. Heavy site traffic during construction and then an additional 600-700 cars once the wider development of Aithrey Kerse, of which this site forms part, is built out will cause unacceptable impacts on the road network and on pollution levels.</p> <p><u>Noise/air quality</u></p>		

Development of the wider Aithrey Kerse area will result in increased noise and air pollution levels.

Impact on the Airthrey Castle Designed Landscape

The MIR does not mention the proximity of site STR11 to the Airthrey Castle Designed Landscape.

A submission on this site was also received from SLDP\_327 (Graham's Dairies). This relates to the wider area of Aithrey Kerse which includes STR11. Graham's Dairies state that development at site STR11 would go ahead as part of the development of STR09 and therefore can't be considered in isolation from this. See a summary of Grahams Dairies comments under STR09.

**Stirling Council Response:**

This site was promoted through the call for sites process. It did not appear in the MIR as an option for residential development.

Most representations received on STR11 were against the principle of its development for the reasons set out in the headings above and these opinions are noted. The Council was considering this site as part of the wider Airthrey Kerse site (STR09) in the MIR and it was not an option to allocate it in isolation. As is explained in the Council's response to STR09 Airthrey Kerse, the Council refused an application for 600 houses and associated uses in March 2016. The outcome of this application has resulted in the Airthrey Kerse site no longer being an option for inclusion in the Proposed Plan.

Consequently, site STR11 North of Easter Cornton Stirling, which forms part of the wider Airthrey Kerse site also does not appear in the Proposed Plan as an allocated site.

<b>Ref.</b>	18	<b>PARK OF KEIR (DUN07)</b>	
<b>Representations by:</b>			
SLDP_183 – Stirling Civic Trust	01320 – The Park of Keir Partnership		
SLDP_1012 – Gillian Allison	01474 – Malcolm G. Shaw		
SLDP_1154 – B. Clark	01484 – Chris Gould		
SLDP_1218 – Linda Hamilton	01485 – Elaine Campbell		
SLDP_1275 – S. Profili	01545 – Patricia Profili		
00177 – Leslie Fisher	01610 – June Edmond & Stirling Morrison		
00260 – Kenneth and Doreen Ferguson	01624 – Rebecca Carmichael		
00308 – Jill Burt	01630 – Lewis Goldie		
01039 – Cycle Stirling	01693 – Holly MacLean		
<b>Total No.</b>			16
<b>Summary of Comments:</b>			
Stirling Civic Trust (SLDP_183), Gillian Allison (SLDP_1012), Linda Hamilton (SLDP_1218), Leslie Fisher (00177), Kenneth and Doreen Ferguson (00260), Jill Burt (00308), Malcolm G. Shaw (01413), Elaine Campbell (01485), June Edmond & Stirling Morrison (01610) object to the development of Park of Keir and thus support the Main Issues Report position of not identifying the site as an additional housing allocation option. The following issues have been raised: impact upon biodiversity and landscape character; loss of open space, including woodland; loss of green belt; development would lead to coalescence between Bridge of Allan and Dunblane; traffic impacts, including on Keir Roundabout; capacity of infrastructure in Dunblane (schools, health centre, sewerage, roads and parking); impact upon archaeological site.			

The Park of Keir Partnership (01320) request that the Council reconsiders the merits of the proposal and that the new LDP reflects the Council's decision on the planning application.

S. Profili (SLDP\_1275) and Patricia Profili (01545) support limited development of the site, up to 20 houses, providing it integrates with the landscape

B. Clark (SLDP\_1154) and Cycle Stirling (01309) note with regard to Active Travel, a separate two-way cycle path and crossing points to Bridge of Allan along the A9 and B8033 to Dunblane would be required in addition to the proposed off-road cycle path within the site.

**Schools**

Two pupils from Wallace High School and one one pupil from Dunblane High School commented on the site at engagement sessions held at each school. Rebecca Carmichael (01624), Lewis Goldie (01630) and Holly MacLean (01693) do not support development of the site, with reference made to the impact development would have on traffic at the motorway junction and in Bridge of Allan and Dunblane.

Overall, at Dunblane High School, 15 pupils did not support development of this site, 4 did not know or had no view, while 1 pupil did support development.

**Drop-in Sessions**

58 - Do not support development on the site

4 - Unsure

15 - Support development on the site

**Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.

Subsequent to the publication of the MIR, in December 2015, Planning Permission in Principle for the development of a tennis and golf centre, hotel with leisure and conference facilities and enabling housing development was refused by Stirling Council.

The assessment of the site set out in the MIR remains valid and responses received to the MIR and summarised above support the non-allocation of the site. The Council remains of the view that this is not a suitable site for housing development as development would detrimental to the character and function of the Green Belt and sensitive landscape, forming part of the Keir Local Landscape Area.

The site is not identified as a housing site in the proposed plan and is retained as Green Belt.

<b>Ref.</b>	19	<b>PROTECTION OF CARBON RICH SOILS (MIR10)</b>
<b>Representations by:</b>		
SLDP_33 - Scottish Natural Heritage		01641 - Ruth Butchart 01642 - Tanja MacLean 01648 - Kenneth Wooley

SLDP_175 - Scottish Environment Protection Agency SLDP_188 - Scottish Government SLDP_1012 - Gillian Allison SLDP_1068 - David Spooner 00105 - Dr. Ian Greive 01522 - Raymond Bond 01547 - Jacqueline Edminston	01650 - Helen Cormack 01661 - Jon Cape 01662 - Kate Fuller 01664 - Sfumatura Design Studio 01665 - Keith MacKenzie 01672 - Karyn Webster	
	<b>Total No.</b>	17
<b>Summary of Comments:</b>		
Following respondents agree with preferred policy approach: SLDP_33 - Scottish Natural Heritage, SLDP_175 - Scottish Environment Protection Agency, SLDP_188 - Scottish Government, SLDP_1012 - Gillian Allison, SLDP_1068 – David Spooner, 00105 - Dr. Ian Greive , 01547 - Jacqueline Edminston, 01522 - Raymond Bond, 01641 - Ruth Butchart, 01648 - Kenneth Wooley, 01650 - Helen Cormack, 01661 - Jon Cape, 01662 - Kate Fuller, 01664 - Sfumatura Design Studio, 01665 - Keith MacKenzie, 01672 - Karyn Webster		
The following respondent disagreed with preferred policy approach: 01642 - Tanja MacLean		
<b>Stirling Council Response:</b>		
The preferred policy approach has been reflected in the modified Policy wording set out in the PSLDP's Policy 4.2 – Protection of Carbon Rich Soils. Comments made in support of the preferred policy approach are noted. Though one submission did not agree no further grounds were given.		

<b>Ref.</b>	20	<b>WEST &amp; SOUTH DUNBLANE (DUN01)</b>
<b>Representations by:</b>		
SLDP_1012 – Gillian Allison SLDP_1154 – B. Clark SLDP_1275 – S.Profili 01420 – D. Greenhill 01452 – Walter Abbot 01476 – Keri Davies 01484 – Chris Gould 01527 – Caroline Barlow	01553 – Dandara 01558 – Roy Barlow 01564 – Gordon Roger 01565 – Iain Macfarlane 01670 – Anthony Ford 01676 – Martin Norve 01681 – Niamh Porter	
	<b>Total No.</b>	14
<b>Summary of Comments:</b>		
NB. see also 2. <b>HILLSIDE, DUNBLANE (DUN10)</b> , which forms part of this site.		
Gillian Allison (SLDP_1012), D. Greenhill (01420), Walter Abbot (01452), Keri Davies (01476), Chris Gould (01484), Caroline Barlow (01527), Roy Barlow (01558), Gordon Roger (01564), Iain Macfarlane (01565), Anthony Ford (01670) object and/or raise concerns about the development of this site. Issues raised are summarised as follows:		
<u>Loss of open space and woodland</u>		
The area is well used for recreation and has positive benefit in terms of physical exercise and mental health and well-being; also valued for its biodiversity value. The woodland, parts of which are classified as Ancient and would be irreplaceable, and Baxter's Loan, an historic path which forms a valuable and attractive green access route (including to the		

High School), were highlighted as particularly important in terms of recreation; as an educational resource; a habitat for wildlife; and with regard to the setting of Dunblane. The role of the woodland in screening the A9 and associated noise and pollution was raised.

#### Impact on green belt and landscape

Development would be at odds with green belt and LLA designations which are important in maintaining the 'nucleated and secluded character' of the settlement and its setting. Alongside Park of Keir proposals, would compound the erosion of the green belt separating Dunblane and Bridge of Allan.

#### Infrastructure

Concern was raised that recent development in Dunblane has not been matched by investment in infrastructure and the further development would exacerbate existing infrastructure problems relating to school capacity; health care provision; sewerage and drainage.

#### Traffic

Development would generate additional car journeys on a road network which is narrow in places and with steep hills thus problematic in winter. Lead to further congestion at Keir roundabout and increase potential for accidents.

It was felt by one correspondence that Dunblane had seen more than its fair share of new housing in the past 15 years and that period of consolidation is required. Another noted other, less sensitive, sites exist.

Development of the site is promoted by Dandara (01553). Dandara have submitted a 'Concept Masterplan' accompanied by technical studies which they consider demonstrates that the area is capable of accommodating the strategic expansion of Dunblane in the long-term.

The submission states:

- ground conditions are suitable for development, the site isn't contaminated and extensive ground works are not required;
- in landscape and visual terms the site is the optimum area for growth in Dunblane and development would have limited visual impact;
- development would have minimal impact on fauna/ flora and no statutory designations would be affected;
- No individual trees of any note will be affected;
- Historical designations have been compromised by the construction of the A9; commercial woodlands, modern farming methods and development;
- The site can be suitably drained. Scottish Water has included Dunblane in the new capital investment programme;
- The site can be accessed to accepted design guidance, including footpaths and cycle ways;
- The site is promoted jointly by landowner and developer ensuring early and continuous delivery of development of up to 500 new houses and associated uses;
- Green belt designation should not be an impediment to development;
- The A9 to the west forms the logical Greenbelt boundary to Dunblane, whereas the existing boundary is arbitrarily defined, not defensible and dilutes the role of green belt as it is eroded on a piecemeal basis;
- Constraints placed on development by education capacity must be addressed to allow for the future growth of Dunblane and a mechanism exists for this through developer obligations;

Dandara conclude there is no reason why DUN01 should not be allocated in the proposed LDP; its allocation would enable the masterplanned approach to the growth of Dunblane

as required by the Reporter during the adopted LDP Examination and maximise the investment in infrastructure.

S.Profili (SLDP\_1275) and Martin Norve (01676) do not oppose development of this site. It is noted that development could improve the appearance of the approach to the settlement.

B. Clark (SLDP\_1154) states there is an urgent need to upgrade NCN 765 between the footbridge over the A9 to beyond Greenyards/Argaty from a muddy track as present so it is suitable for cyclists (commuters and tourists) to/from Doune and the Trossachs.

### **Schools**

At an engagement session at Dunblane High School, 7 pupils did not support development of this site, 7 were unsure or had no view, while 4 pupils did support development. One pupil specifically commented that development of the site would expand Dunblane's size and population too much, affecting the character of the settlement.

### **Drop-in Sessions**

21 – Do not support development on the site

1 – Unsure

6 – Support development on the site

### **Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the whole site as an additional housing allocation option in the MIR.

Responses received to the MIR and summarised above support both the allocation and non-allocation of the site, with the majority view not supporting development. The site is promoted jointly by landowner and developer for the development of up to 500 new houses and associated uses.

The Council remains of the view that the assessment of the site set out in the MIR is valid and the site should not be identified for housing development with the exception of an allocation of 15 houses at Hillside (see 2. Hillside). Up to 500 houses at this location would have significant adverse impacts on the landscape setting of Dunblane, particularly on the southern approach to the town.

The potential for new housing in Dunblane is significantly constrained by school capacity. Existing planned development identified in the Housing Land Audit 2015 plus the sites included in the proposed plan at Barbush (80 units) and Hillside (15 units) can be accommodated with minor modifications to existing schools and phasing development, new housing beyond these numbers could not be supported.

Together with alternative sites allocated by the proposed plan, sufficient housing land has been identified.

The wider site is not identified as a housing site in the proposed plan and is retained as Green Belt.

<b>Ref.</b>	21	<b>HUTTING DEVELOPMENT (MIR15)</b>
<b>Representations by:</b>		
SLDP_102 – Strathblane Community Council	01639 – John Gray 01641 – Ruth Butchart	
SLDP_188 – Scottish Government	01642 – Tanja MacLean	
SLDP_1012 – Gillian Allison	01643 – Steven MacLean	
SLDP_1068 – David Spooner	01648 – Kenneth Woolley	
01140 – Linda Galloway	01662 – Kate Fuller	
01522 – Raymond Bond	01672 – Karyn Webster	
01526 – William Whitelaw		
01547 – Jacqueline Edmiston		
	<b>Total No.</b>	15
<b>Summary of Comments:</b>		
<p>Scottish Government (SLDP_188), Gillian Allison (SLDP_1012), David Spooner (SLDP_1068), Raymond Bond (01522), William Whitelaw (01526), Jacqueline Edmiston (01547), John Gray (01639), Ruth Butchart (01641), Kate Fuller (01662)</p> <p>Agree that it would be appropriate for the LDP to include a policy on hutting developments and that the preferred option for Policy 15.1 provides an appropriate response to SPP.</p> <p>Tanja MacLean (01642) and Steven MacLean (01643) agree that it would be appropriate for the LDP to include a policy on hutting developments but disagrees that the preferred option for Policy 15.1 provides an appropriate response to SPP.</p> <p>Kenneth Woolley (01648) disagrees that it would be appropriate for the LDP to include a policy on hutting developments and that the preferred option for Policy 15.1 provides an appropriate response to SPP.</p> <p>Strathblane Community Council (SLDP_102) have no objection to a hutting policy but urge the Council to consult the Carbeth hutters before adopting any policy on this topic.</p> <p><b>Survey Monkey</b>  MIR 15.1 - that it is appropriate that this LDP includes a policy on hutting developments?  Agree – 10  Disagree – 1  Don't know/No Opinion - 16</p> <p>MIR 15.2 - that the preferred option for Policy 15.1 provides an appropriate response to SPP?  Agree – 7  Disagree – 3  Don't know/No Opinion – 15</p>		
<b>Stirling Council Response:</b>		
<p>Support for the preferred option, including from Scottish Government, is noted. It is considered that the proposed reference to huts, alongside chalets, in Policy 15.1 and to be supported by proposed Supplementary Guidance will provide an appropriate and positive policy framework for huts.</p> <p>Consultation with the Carbeth Hutters Community Association will be undertaken ahead of the publication of the Proposed Plan and Supplementary Guidance.</p>		

<b>Ref.</b>	22	<b>SUNNYLAW, BRIDGE OF ALLAN</b>	
<b>Comments by:</b>			
SLDP_126 – Scottish Water		01582 – Mary-Anne Dougan	
SLDP_1012 – Gillian Allison		01583 – Mr & Mrs Mathieson	
SLDP_1218 – Linda Hamilton		01627 – Jgorg Jvonovo	
01398 – Dr Crinan Alexander		01629 – Rhys Williamson	
01430 – Barry Ponzio		01674 – Ross Hunter	
01470 – Keiran Penny			
01500 – Brenda & Alasdair Smith		<b>Total No.</b>	12
<b>Summary of Comments:</b>			
Development of the site for housing is promoted by Dr Crinan Alexander (01398).			
A supporting statement observes the site is immediately adjacent to an existing settlement within the identified Core Area, and offers potential for a relatively small-scale development in keeping with the built environment surrounding it, whereas elsewhere there are few opportunities for consolidation and expansion of the settlement. It is confirmed that development in the form anticipated by the MIR could be accommodated			
A summary of information submitted on transport and flooding is noted under the relevant headings below.			
Gillian Allison (SLDP_1012), Barry Ponzio (01430), Brenda and Alasdair Smith (01500), Mr & Mrs Mathieson (01583) and Ross Hunter (01674) object to the potential development of the site. The following issues have been raised:			
<u>Roads and access</u>			
Pendreich Road at this point is single-track, raising concerns about access to the site. The condition of the road surface is in poor condition, which would be exacerbated by increased traffic. Mary-Anne Dougan (01582) also raised concerns relating to the road, including access to Sunnylaw.			
The site is not considered to be a sustainable location with poor connectivity, no public transport links or daily amenities located within close proximity.			
A transport analysis has been undertaken and submitted in support of the site. It concludes that access to a limited number of single plots can be taken directly from Pendreich Road, continuing the existing pattern of development, with little impact on existing transport networks.			
<u>Flooding and Drainage</u>			
It is stated development of site would create potentially severe surface water flooding, particularly to lower-lying properties on Upper Glen Road due to the sloping nature of the site. The surrounding area has been subject of flooding previously, causing significant damage including to the road and while drainage works in 2013 appear to have addressed problems, any future development should not lead to increased flood risk. Limited contribution to the housing land supply is disproportionate to flood risk to properties.			
A Flood Risk Assessment (FRA) has been submitted in relation to the site. It is stated the FRA demonstrates that the proposal could be developed in this location which will not increase flood risk away from the site. Specific measures could be put in place which would bring a net reduction in surface water flow to the sensitive receptors in the locality.			
<u>Character</u>			

Modern development would not be in keeping with adjacent properties which are largely Victorian, particularly in the Conservation Area adjoining the western boundary, or with the expansive farmland and countryside. Any development would require the design, materials and landscaping to be tightly controlled.

#### Right of Way

Path diagonally crossing the site which connects the golf course to Upper Glen Road should be taken account of.

#### Overlooking

Development of the site would lead to overlooking of properties on Upper Glen Road and subsequent loss of privacy.

Other concerns raised relate to loss of countryside; impact on the landscape; light pollution; nature conservation; setting a precedent for further development of farmland alongside Pendreich Road.

Linda Hamilton (SLDP\_1218) and Kieran Penny (01470), have submitted comments objecting to the development of a number of sites in Bridge of Allan and Causewayhead/Cornton.

Scottish Water (SLDP\_126) advise there is adequate water supply and capacity for waste water treatment. There is an existing sewer pipe running under top section of site.

#### **Schools**

Two pupils from Wallace High School commented on the site at an engagement session with 4<sup>th</sup> and 5<sup>th</sup> year students held on Thursday 8 October 2015. Jgorg Jvonovo (01627), Rhys Williamson (01629) support development of the site.

Overall, 1 pupils did not support development of this site, 12 did not know or had no view, while 8 pupils did support development.

#### **Drop-in Sessions**

8 - Do not support development on the site

1 - Unsure

10 - Support development on the site

#### **Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. The site was deemed consistent with the Plan's Vision and Spatial Strategy and, taking account of the findings of the other assessment criteria, it was concluded the site should be identified as an additional housing allocation option in the MIR.

Opinion at public and school consultation events was split, with the same number of people in favour of development as opposed. Five submissions were submitted objecting to development alongside one promoting the site for development. The issues raised are discussed below:

#### Roads and access

It is considered a limited number of single plots could be accessed from Pendreich Road and that development of the scale proposed would not impact to any noticeable extent in transport terms. Upgrades to the road may be required, such as extending the 30 mph zone and providing passing places.

### Flooding and Drainage

The potential of the site being developed contributing to surface water flooding is acknowledged. A Flood Risk Assessment submitted in support of the site concludes it could be developed in a manner that would not increase flood risk and indeed would have a positive impact. Further detailed work will be required at the planning application stage to demonstrate that development will not lead to increased flood risk, in accordance with the development plan.

### Character

The closest buildings, no. 9 Pendreich Road and the Bridge of Allan G.C. clubhouse, are modern in appearance; the Conservation Area with its Victorian residencies lies to the west along Upper Glen Road, but at a lower elevation. It is considered an appropriate form of development can be achieved in keeping with the character of the area.

### Right of Way

Any rights of way would be required to be maintained.

### Overlooking

The development management process can ensure issues relating to overlooking and loss of privacy are addressed at the detailed planning stage. In general, a minimum 18 metre distance for privacy between windows of habitable rooms that are parallel to each other is sought; it is envisaged that development will continue the pattern of single plots fronting Pendreich Road and, as such, a significantly larger distance between the new development and existing properties on Upper Glen Road will be achieved.

Having taken full account of all comments submitted in response to the MIR consultation it is concluded it is appropriate to identify the site as a formal housing allocation in the proposed plan, subject to a range of appropriate key site requirements. Development would continue an existing pattern without setting a precedent for further development or significant impacts upon the landscape, nature conservation or the character of the surrounding area.

<b>Ref.</b>	23	<b>WESTER CORNTON, STIRLING (STR12)</b>
<b>Representations by:</b>		
01490 – Aileen Penny 01470 – Kieran Penny 01098 – Steven Hamilton SLDP_1218 – Linda Hamilton 00430 – James Weldon SLDP_932 – Catherine Lafferty 01184 – Mr and Mrs McCreath 01039 – Cycle Stirling	01047 – Iain Graham 01574 – Douglas and Christine MacFadzean 00682 – Mansell Homes 00711 - SNP 01653 – Alasdair Johnston	
	<b>Total No.</b>	13
<b>Summary of Comments:</b>		
Common issues arising from respondents:		
<u>Flooding</u> (01490, 01098, SLDP_1218, 00430, SLDP_932, 01184, 01047, 01574, 00711) The site sits in the flood plain and there is concern that new development will result in flooding issues putting future residents at risk. There is concern that this will worsen due to climate change impacts.		
<u>Loss of views/scenic impact/landscape impact</u> (01490, 01470, 01184, 01653)		

Concern that housing development at this location would impact on the aesthetics of the area and the beautiful views and scenery currently experienced in this part of Bridge of Allan and Causewayhead. Adverse landscape impacts on the Carse is also stated as a concern.

Coalescence of Stirling and Bridge of Allan (01184, 01047, 01574, 0711)

Development of this site would contribute towards to the coalescence of Stirling and Bridge of Allan meaning that both communities would lose their respective unique character.

Loss of greenbelt (01098, SLDP\_1218, 01184, 01047, 01574, 00711)

Against building on and the resulting erosion of, the green belt at this location which separates Stirling and Bridge of Allan. This can lead to coalescence of the two towns which is unacceptable. There are plenty of brownfield sites in the area which can accommodate development.

Impact on Wildlife (SLDP\_1218, 00430)

New housing development would have a detrimental impact on wildlife at this location of which there is a plentiful supply.

Education Capacity (SLDP\_1218, SLDP\_932, 00711)

Schools in this area cannot accommodate pupils from this proposed new housing. The education issue is complex and there is an obvious need to explore the sensitivity of any failure to deliver allotted education facilities and the knock on effect that this may have on other areas.

Health Services Capacity (SLDP\_1218, SLDP\_932, 00711)

There is insufficient capacity within the health service i.e. doctor's surgeries, dentists and hospital beds to accommodate further residents.

Transportation issues (01184, SLDP\_1218, 01039, 01047, 00711)

Regarding transport, it appears that car travel may be on the decrease and proposals in the current City Transport Plan to include road links from Airthrey Road to Cornton Road and across the river to Kildean cannot be justified especially if more were to be done to increase public transport availability and quality. A new road link to Kildean is likely to make local car journeys easier and quicker will only encourage more car use.

There is specific opposition from 0711 (SNP) to the building of a link road from Cornton Road to Aithrey Road and traffic impacts generally. The transport assessment for STR12 is rejected and concern is stated about the Council's intention to review transportation policies as there appears to be backtracking from modal shift principles that feature in the transportation assessments in the MIR.

In general terms, there are also concerns about transport links and the capacity of the road network to accommodate growth at this location.

Cycle routes should be mentioned and prioritised in the planning as segregated, direct, attractive, integrated routes not squeezed in, circuitous, stopping for multiple junctions as the current ones are.

Housing Numbers and Affordable Housing (01490, 00711)

There is no need for more large houses, only affordable houses for first time buyers and those on average incomes. The forthcoming proposed plan should be true to existing affordable housing targets and these should feature in the final documents. Overall, the current adopted plan allocates sufficient numbers to meet current and future demand

One representation was submitted in support of the application:

Mansell Homes

00682 (Mansell Homes) Is promoting the site for development and have made a submission for a slightly larger site than is identified as site STR12 in the MIR. This includes a triangular area which would remain undeveloped and be planted as community woodland to strengthen the settlement separation between Cornton and Bridge of Allan. The proposed development concept is to deliver a scale of development complementary to the area while reinforcing the designated greenbelt.

Provision is also made in the submission for a road link through the site across the railway in order to replace the Cornton Road level crossing which is a transportation outcome sought from the LDP process. Mansell accepts that the precise location for the crossing and the associated road network remains to be addressed and states that discussions with Network Rail to date have not finalised matters. The road crossing will become a significant feature within this local area and its physical/visual integration would be best achieved as part of a comprehensive development strategy allowing new beneficial development while providing and maintaining a clearly defined and enhanced settlement edge to both Stirling and Bridge of Allan. A plan showing how the road crossing could integrate with new development both at sites STR12 and STR09 has been submitted.

Mansell is of the view that the site assessment of STR12 is overly critical and inconsistent with that carried out at Airthrey Kerse (STR09) (this site forms an option for two out of three options set out in the MIR). It is contended that the assessments for both sites should be more closely mirrored as, in their view, the sites have similar planning issues facing them.

Existing and housing land allocations being proposed through the MIR are unlikely to deliver the level of development required to meet identified needs. This site meets the 'additional' residential sites criteria set out in the MIR and could secure the road alignment as required by the LDP, deliver both market and affordable housing, provide a wide range of housing to meet a variety of housing needs and provide community woodland to maintain/strengthen the separation of Stirling and Bridge of Allan.

**Drop In Sessions**

- 1 – Did not support development on this site
- 0 – Unsure
- 0 – Support development on this site

**Stirling Council Response:**

This site was promoted through the Call for Sites process but was not identified as an option for housing development in the MIR.

This site was not identified as an option through the MIR as parts of this site are likely to be required for a new Kildean – Airthrey link road and also to accommodate a new road bridge required to replace the Cornton level crossing. It was also considered that residential development of the site would be visually intrusive and would compromise the function of the greenbelt when viewed with other proposed development. This other proposed development is Airthrey Kerse which previously formed part of options 2 and 3 in the MIR but no longer does on account of planning permission for the site having been refused by the Council in March 2016.

The majority of comments received at MIR stage are opposed to the development of this site for landscape, greenbelt, coalescence, loss of views etc. and these comments are duly noted as are representations which object to the new road link.

Transport modelling carried out during preparation of the plan indicates that a new Kildean - Airthrey Link road is necessary to accommodate full build out of all LDP sites within the plan period to 2037. For this reason it is essential that this road link is identified in the new LDP.

In addition, Network Rail require to construct a new rail crossing to replace the Cornton level crossing largely for safety reasons.

It is noted that Mansell Homes who are promoting the site through the LDP have submitted an indicative layout showing a road link across the railway which they claim will achieve the aspirations of the LDP although it is noted that consultation with Network Rail is ongoing and that the location of the crossing is subject to change. Their argument is that this crossing should be delivered as an integral part of a residential development.

Despite the Airthrey Kerse site no longer being an option as a LDP housing site, the Council remains of the view that STR12, Wester Cornton is not suitable for housing development. It is highly visible due to its location adjacent to the road (B823 Cornton Road) and rail line meaning that residential development would be visually intrusive and would remove the existing strong sense of separation between Cornton and Bridge of Allan resulting in a significant aspect of the function of the existing greenbelt being removed. In addition to this, the location and extent of future transport infrastructure necessary to deliver the LDP and Network Rail's requirements remains to be determined. It is therefore unknown whether the proposed scale of residential use is capable of being accommodated. Until preferred routes for the crossing are more certain, the LDP cannot identify development which could restrict key future infrastructure.

The Council has also identified sufficient housing land on alternative sites meaning that in terms of housing land supply, there is no need to identify this site for residential development in the proposed plan.

<b>Ref.</b>	24	<b>CUSHENQUARTER FARM, PLEAN (PLE03)</b>	
<b>Representations by:</b>			
SLDP_126 - Scottish Water 01457 - Simon Young 01480 - Mr. and Mrs. Pittman 01481 - Mr. E. Adcock 01504 - John and Christina Silcock 01518 - Lorna Stephen		01523 - Elinor Lederle 01576 - John Perrin 01593 - Robin Young 01612 - Lynne Walker-Lowe	
		<b>Total No.</b>	10
<b>Summary of Comments:</b>			
SLDP_126 - Scottish Water Adequate water supply, possible further investigation required on local network. Regarding waste water treatment early discussions recommended. Plean Waste Water Treatment Works located next to the top of the site, potential for complaints re odour, noise, etc.			
01457 - Simon Young, 01480 - Mr. and Mrs. Pittman, 01481 - Mr. E. Adcock, 01504 - John and Christina Silcock, 01518 - Lorna Stephen, 01523 - Elinor Lederle, 01576 - John			

Perrin, 01593 - Robin Young, 01612 - Lynne Walker-Lowe, referring to one or more of the following matters:

- i) Concern regarding private farm access being used for general access close to our home;
- ii) Loss of privacy and potential overlooking from elevated buildings;
- iii) A9 already heavily trafficked, including a high proportion of speeding vehicles. There has already been increased movements by traffic associated with Forth Valley Royal Hospital (staff, patients, visitors and ambulances) and a new slip road at Glenbervie, heavily used by HGV's from the Caberboard plant that previously used the roundabout at Stirling Services, including through the night. No need for any more traffic. Village offers few employment prospects so the new residents will presumably commute by car to a place of employment. Detrimental to vehicular and pedestrian safety, including children attending primary school. There will be further pollution. Ban HGV's between 22.00 and 8.00;
- iv) To form a village gateway with new mini-roundabout is not appropriate. Whilst accepting it will slow traffic down additional noise and pollution will be detrimental to the enjoyment of adjacent properties;
- v) If mini-roundabout required should be built at the junction with Church Lane, to help access for congregation and local residents;
- vi) Support provision of additional traffic calming features on the A9;
- vii) Additional residents will result in further pressure on limited village centre parking. viii) Site sandwiched between the M9 and the A9 with both roads being populated by heavy fast-moving vehicles. The resulting noise and pollution will not be conducive to good health in the new community;
- viii) Increased pressure on already strained services. Currently no permanent general practitioner and local school will struggle. Few facilities locally for recreation and entertainment;
- ix) The area is prone to flooding. Where would the displaced water go. There is already regular flooding on the A9;
- x) The sewage works cannot cope with all the planned units;
- xi) Loss of expansive views that include historic features such as Plean Castle;
- xii) The fields are a haven for wildlife;
- xiii) Has account been taken of proposed fracking proposals;
- xiv) Proximity to pylons, surely a health risk;
- xv) As Cushenquarter Farm is predominantly a livery stable consideration could be given to the provision of a road crossing onto Church Lane, via an existing track and right of way, to negate the need for horses to hack along the A9 to access Plean Country Park;
- xvii) Potential impacts on the residents of the William Simpson Home, some of whom are vulnerable;
- xvi) Potential impacts on the setting of the 'listed' William Simpson Home.

**Drop in Sessions**

5 – Did not support development on this site

0 – Unsure

0 – Support development on this site

**Stirling Council Response:**

This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (PLE03). The site has previously been deemed consistent with the SLDP's Vision and Spatial Strategy. In recognition of known infrastructure constraints, particularly in relation to primary and secondary school capacities, the site was however identified as a 'Period 2' development, commencing 2024 to 2034.

In developing housing options for the MIR it was concluded a modest allocation of 100 housing units could now be identified at Cushenquarter and feature in Phase 1 Period 1 of the PSLDP, i.e. 2017 to 2022, and was included in the MIR's Table 6 - Additional Housing Allocation Options 1 and 3.

Having taken full account of all comments submitted in response to the MIR consultation the Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development. As set out in the Plan settlement statement to accord with the SLDP's Vision and Spatial Strategy housing development land in the Eastern Villages has been allocated at a sufficient scale to support socio-economic regeneration through developer contributions, either directly or in-kind.

It is concluded that it is appropriate to continue to identify the site as a formal housing allocation in the PSLDP, but now identify 100 units for inclusion in Phase 1 Period 1, i.e. 2017 to 2022. This takes into account education capacity constraints at the local primary school. It is recognised in the plan that further development at this site may be possible in period 2 of the plan although the scale of this further release will be dependent on education constraints being overcome.

The submitted comments cover a range of planning and environmental issues, and also question the principle of the site allocation. The PSLDP strongly supports high standards of placemaking, site planning and sustainable development that, in turn will inform, the assessment of any planning application that maybe submitted for the site. This allocation is also subject to a range of key site requirements addressing, where practicable, concerns raised in the submitted comments.

<b>Ref.</b>	25	<b>NETWORK OF CENTRES (MIR6)</b>	
<b>Representations by:</b>			
SLDP_188 – Scottish Government		01639 – John Gray	
SLDP_193 – Tactran		01642 – Tanja MacLean	
SLDP_1012 – Gillian Allison		01643 – Steven MacLean	
SLDP_1068 – David Spooner		01665 – Keith Mackenzie	
00105 – Dr. Ian Grieve		01672 – Karyn Webster	
01522 – Raymond Bond		<b>Total No.</b>	12
01613 – Historic Environment Scotland			
<b>Summary of Comments:</b>			
Scottish Government (SLDP_188) Tactran (SLDP_193), Gillian Allison (SLDP_1012), Dr. Ian Grieve (00105), Raymond Bond (01522), Historic Environment Scotland (01613), John Gray (01639), Karyn Webster (01672) agree with the revised network of centres hierarchy.			
Comments made in support note the revised hierarchy will encourage developments in locations which can be accessed by a variety of travel modes and reduce dependence on the private car and focus development more on the region's historic centres to support their long-term prosperity and vibrancy			
David Spooner (SLDP_1068) disagrees with the proposed hierarchy, stating Dunblane should not be considered part of the core area until community infrastructure development			

matches housing development. Tanja MacLean (01642), Steven MacLean (01643) also disagree.

Keith Mackenzie (01665) asks why tourism isn't identified as a key role and function of Dunblane and Bridge of Allan town centres, as both settlements attract day and 'staying' visitors.

**Survey Monkey**

Do you agree or disagree that the revised Network of Centres Hierarchy set out in Figure 10 should be revised and reflected in Policy 2.6?

Agree – 4

Disagree – 3

Don't know/No opinion – 23

**Stirling Council Response:**

Support for the revised network of centres, including from the Scottish Government, is noted. The revised hierarchy now accords with SPP.

Comment is made regarding the status of Dunblane within the core area in view of what is deemed to be inadequate community infrastructure. This is not strictly relevant to the identification of Dunblane town-centre within the Network of Centres, however, it is considered that, given the size of Dunblane, existing community facilities, retail provision and transport links it is appropriate that Dunblane is identified within the core area and the town centre within the Network of Centres.

It is agreed that tourism should feature as a key role and function of Bridge of Allan and Dunblane town centres.

<b>Ref.</b>	26	<b>TOWN CENTRE FIRST PRINCIPLE (MIR7)</b>	
<b>Representations by:</b>			
SLDP_188 – Scottish Government		SLDP_1218 – Linda Hamilton	
SLDP_178 – sportscotland		01140 – Linda Galloway	
SLDP_193 – Tactran		01556 – Scottish Enterprise	
SLDP_324 – University of Stirling		01673 – Craig Anderson	
SLDP_1012 – Gillian Allison		<b>Total No.</b>	9
<b>Summary of Comments:</b>			
<p>Scottish Government (SLDP_188) expects development plans to adopt a town centre first approach in line with SPP. Welcomes the inclusion of the new requirement for assessments on the impacts on centres.</p> <p>sportscotland (SLDP_178) highlight that, in some instances, sports facilities, for example those associated with schools, may have locational requirements that mean they cannot be accommodated within existing centres. SPP refers to 'education facilities' as uses that generate significant footfall for which network centres should be preferred locations; sportscotland consider development plan policy should not take a blanket approach to all the uses outlined in SPP and should instead be flexible and realistic, applying the town centre first principle where appropriate.</p> <p>Tactran (SLDP_193) agree with the proposed changes to Policy 2.6 and 2.7 to incorporate the aims of the town centre first principle, stating it will encourage developments in</p>			

locations which can be accessed by a variety of travel modes and reduced dependence on the private car.

Scottish Enterprise (01556) supports the Main Issues Report Preferred Option with one caveat, regarding office development. SE appreciates that office development can attract significant footfall and can be ideally located within existing centres. However, as office development falls within Class 4, SE considers that the revised policy should not introduce barriers (through uncertainty or onerous testing) to Class 4 development on land allocated for this use, or on land not allocated but for which such development would provide net economic benefit to the area. On this basis, SE requests alternative wording to Policy 2.7 (d).

University of Stirling (SLDP\_324) state there must be recognition that the University is a large community, equivalent to many of the largest villages in the LDP area, and needs shops and services provided locally to meet the needs of that community. Planning policy should support appropriate retail, leisure, social and community facilities provided on campus. The University intends to continue to open its facilities to the community.

Craig Anderson (01673) considers the town centre first principle to be essential should be a priority. A concerted and integrated effort to improve the city centre is required to unlock its potential.

Gillian Allison (SLDP\_1012) disagrees that the aim of the 'town centre first' principle should be incorporated within Policy 2.6 and 2.7 as proposed, as this could disadvantage centres out with the town.

Linda Hamilton (SLDP\_1218) and Linda Galloway (01140) provide general comment about Stirling city centre, noting that a rethink is required as people don't shop the same way; it's too expensive to access the town centre regularly; and it is depressing and off-putting to see empty shops, litter and vandalism.

### **Survey Monkey**

Do you agree or disagree that the aim of the 'town centre first' principle should be incorporated within Policy 2.6 and 2.7 as proposed?

Agree – 13

Disagree – 1

Don't know/No opinion – 17

### **Stirling Council Response:**

The Scottish Government's comments welcoming the inclusion of a requirement for assessments on the impacts on centres and regarding the expectation that the LDP adopts a town centre first approach is noted, along with other submissions received and summarised above. Policy 2.6 and 2.7 have further been revised to provide a policy framework which supports town centres, including the city centre and local centres, in accordance with SPP and the town centre first principle by identifying them as the preferred location for uses which generate significant footfall.

sportscotland and Scottish Enterprise advocate a more flexible and realistic approach to the town centre first principle in respect to sports facilities and office accommodation receptively. In both instances, it is considered that the proposed plan accords with SPP. In the case of office use, Policy 2.7 first-and-foremost supports the development of offices (falling with Class 4) on sites allocated for employment use and identified as suitable for Class 4 use. It is not considered that the policy introduces barriers to Class 4 development

on land allocated for this use. This is consisted with a plan-led approach to new development.

With regard to the University, it is acknowledged that the campus could be viewed as a local centre in that it hosts shops and services that serve the University population but it is not considered necessary to identify this formally through the LDP as it is not a conventional network centre with the development pressure this brings. The proposed plan supports development within the campus in accordance with the Masterplan, the future review of which offers the opportunity for a plan-led approach to the development of new retail, leisure, social and community facilities provided on campus.

<b>Ref.</b>	27	<b>BARBUSH, DUNBLANE (DUN08)</b>	
<b>Representations by:</b>			
SLDP_85 – Dunblane Community Council		01592 – Miller Homes	
SLDP_126 – Scottish Water		01676 – Martin Norve	
SLDP_350 – Gladman Developments Ltd.		01686 – Louis Bryson	
SLDP_1012 – Gillian Allison		01690 – Neil Fraser	
SLDP_1154 – B. Clark		01693 – Holly MacLean	
SLDP_1275 – S. Profili		01694 – Emma Fitzsimmons	
01039 – Cycle Stirling		01695 – Sophie Gilchrist	
01545 – Patrica Profili		<b>Total No.</b>	14
<b>Summary of Comments:</b>			
<p>The site is promoted by Gladman Developments Ltd. (SLDP_350) and Miller Homes (01592) who support the partial allocation of the site for housing in the MIR, however seek that the allocation is extended to cover the entirety of currently designed Employment &amp; Retail LDP allocation, creating a residential capacity of up to 100 units. The MIR identified the employment portion of the site (B28) only, with an indicative capacity of 30 units. In support of the larger site the following is raised:</p> <ul style="list-style-type: none"> <li>• Site is within the settlement boundary, brownfield (a former quarry) and well located with transportation links and access to services;</li> <li>• Residential use would be in keeping with the character of the surrounding urban and local landscape context;</li> <li>• For over three years the site has been actively marketed for a food store with no success;</li> <li>• As a Tier 2 settlement, a solution to education issues can and must be sought in order to facilitate the level of development needed to meet additional housing land requirements. (Miller Homes state there is Primary and Secondary School capacity).</li> <li>• Site is effective and can actively contribute to the housing land supply in the short to medium term (within 3 years of the adoption of the Plan).</li> </ul> <p>Gillian Allison (SLDP_1012) agrees with the MIR proposal, but seeks conservation of orchids on site. Notes the short distance to the A9 junction as a potential issue.</p> <p>Patricia Profili (01545) and Martin Norve (01676) support the proposal. Infrastructure and services are present, a good landscape boundary is established that would integrate development visually.</p>			

Dunblane Community Council (SLDP\_85), in the context of DUN01 and DUN10, propose the designation of the whole of the Barbush site for mixed housing, including a significant number of affordable houses to meet the current needs and the exclusion of Hillside (DUN10) from the current revision of the LDP.

B. Clark (SLDP\_1154) and Cycle Stirling (01039) comment on green network and active travel links, highlighting opportunities to provide separate safe, direct, attractive walking/cycling access, including to and via the B8033 and through the old quarry underpass to Allan Water/core path to Ashfield.

S. Profili (SLDP\_1275) and Patricia Profili (01545) note Newton Primary School is at capacity.

Scottish Water (SLDP\_126) confirm there is adequate water supply, with possible further investigation required on local network. The Dunblane WWTW is nearing capacity and undergoing a review to confirm exact capacity numbers.

### **Schools**

Three pupils from Dunblane High School commented on the site at an engagement session held on 23<sup>rd</sup> October with year 4/5 pupils.

Louis Bryson (01686) and Neil Fraser (01690) consider this is a good site for housing, albeit there is an issue with drainage; Holly MacLean (01693) disagrees with development on most of the identified sites in Dunblane with the exception of this site; while Emma Fitzsimmons (01694) and Sophie Gilchrist (01695) don't object to the principle of development, but do not necessarily support housing, preferring for example a petrol filling station.

Overall, at Dunblane High School, 5 pupils did not support development of this site, 7 did not know or had no view, while 10 pupils did support development.

### **Drop-in Sessions**

- 1 - Do not support development on the site
- 2 - Unsure
- 24 - Support development on the site

### **Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. The site was deemed consistent with the Plan's Vision and Spatial Strategy and, taking account of the findings of the other assessment criteria, it was concluded the site should be identified as an additional housing allocation option in the MIR. The site was shown with an indicative capacity of 30 units and is identified in the adopted Local Development Plan as an Employment site (B28).

Those promoting development of the site supported the allocation of the site for housing in the MIR, however their submission seeks that the allocation is extended to cover the entirety of the Barbush site (i.e. to also include the area identified in the adopted Local Development Plan for retail (R06)), creating a residential capacity of up to 100 units.

Opinion at public and school consultation events mainly supported the identification of Barbush as an additional housing allocation. The Community Council supports the development of the larger Barbush site over the site at Hillside (see Ref. 2).

The Council remains of the view that the assessment of the site set out in the MIR is valid and indeed applies to the whole Barbush site. Barbush is a brownfield site which lies within the settlement boundary of Dunblane. It integrates well with the town particularly in the context of recent developments to the south west of the site. Whilst the Council is of the view that the site could not accommodate the 100 units sought, it is considered that a 80 unit development is possible. This, together with other smaller allocations in Dunblane can be accommodated within current education constraints.

The site is identified as a housing site in the proposed plan for 80 units, alongside a number of key site requirements.

<b>Ref.</b>	28	<b>SOUTH OF FINTRY ROAD, KIPPEN (KIP01)</b>	
<b>Representations by:</b>			
SLDP_1186 – Scottish Wildlife Trust		00340 – Margaret Sutherland	
SLDP_93 – Kippen Community Council		SLDP_1327 – Giles Waley	
01424 – R M Muir-Simpson		01410 – David Wright	
SLDP_1325 – June Waley		<b>Total No.</b>	7
<b>Summary of Comments:</b>			
<p><u>Butterfly Orchids</u>          Scottish Wildlife Trust (SLDP_1186), June Waley (SLDP_1325), Giles Waley (SLDP_1327)          Express concern over development on the site that would impact a large population of Great Butterfly Orchids and that this is not reflected in the site assessment.</p> <p><u>Non Allocation of site</u>          Kippen Community Council (SLDP_93)          Agree with the MIR that KIP01 is not a suitable site to identify for development. Express a preference for site identified in the current LDP (H103 Burnside).</p> <p><u>Traffic Concerns</u>          R M Muir-Simpson (01424), David Wright (01410)          Express concern over access arrangements that would utilise existing access via Davidson Lee.</p> <p>Margaret Sutherland (00340), David Wright (01410)          Raise general concern over transport impact in village from development.</p> <p><u>Water and Drainage issues</u>          R M Muir-Simpson (01424), Margaret Sutherland (00340)          Raise concerns that the number of houses proposed could cause supply issues and that the capacity of the water treatment plan is believed to be close to maximum.</p> <p><u>Education Capacity</u>          R M Muir-Simpson (01424), Kippen Community Council (SLDP_93), Margaret Sutherland (00340)          Raise concerns over capacity of local school to cope with development.</p> <p><u>Health Provision</u>          Margaret Sutherland (00340)          Raise concerns over how the Health Centre will be able to cope with more patients.</p>			

Ground Conditions

Margaret Sutherland (00340)

Concern over the water table being altered by development.

**Drop in Sessions**

13 – Do not support development on this site

0 – Unsure

3 – Support development on this site

**Stirling Council Response:**

Butterfly Orchids

The Council does not support development on this site. The site, although assessed for the current LDP was not allocated for development and again after another assessment the Council is not proposing to allocate this site for development. To clarify the issue of the Butterfly Orchids on the site the Council will update the site assessment to include "Butterfly orchids are present on the site and afforded local protection and translocation would not be straightforward." This wording has been agreed with the Councils Biodiversity Officer.

Non Allocation of site

The Community Councils position is noted. This site is not identified for inclusion in the Proposed Plan.

Traffic Concerns

The transport assessment as part of the site assessment in the MIR notes that access to the site remains to be resolved as it is not straightforward and would involve land from existing properties to improve it. The assessment also notes that should development occur mitigation measures will be required.

Water and Drainage Issues

Scottish water have not raised any concerns over water or drainage by the development. However, they did note at Pre MIR stage that the waste water treatment works has limited capacity for new development.

Education Provision

Education Authority note that development of this site would place pressure on Kippen Primary School due to existing planned development in the village.

Health Provision

Whilst capacity at local medical facilities are a concern, there was no response received to consultation requests from NHS Forth Valley. The Council remains committed however to working with NHS Forth Valley to highlight where new development is expected to take place.

Ground Conditions

No ground issues associated with the water table were raised during consultation with Key Agencies.

The site is not identified as a housing site in the proposed plan.

<b>Ref.</b>	29	<b>GLEN ROAD, DUNBLANE (DUN02)</b>	
<b>Representations by:</b>			
SLDP_70 – Kippendavie Group Trust		01039 – Cycle Stirling	
SLDP_1012 – Gillian Allison		01545 – Patrica Profili	
SLDP_1154 – B. Clark		01681 – Niamh Proctor	
SLDP_1275 – S. Profili		<b>Total No.</b>	7
<b>Summary of Comments:</b>			
<p>Kippendavie Group Trust (SLDP_70) are promoting development upon three sites in their ownership on the east/south-east edge of Dunblane, including Glen Road (DUN02).</p> <p>With regard to the MIR site assessment, it is countered that the site is not located within an area of flood risk as defined on the SEPA flood map and as such the management of surface water should not be viewed as a constraint and that the site has the potential to foster non-vehicular travel patterns to key facilities and amenities, including the railway station, town centre and schools by virtue of its location and existing footpath network. It is recognised that the character of the location leads to low density, groupings of future residential development and submitted that drainage capacity exists for phased, low density development.</p> <p>Kippendavie Group Trust seek removal of the site from the green belt to allow for future development linked to maintaining an effective land supply/to meet future housing needs. This would be consistent with the preferred option of meeting housing demand and managing this through a balanced approach to the location of new housing across the Core Area and Dunblane's role as a Core Area Tier 2 settlement. Development would also support town centre investment initiatives.</p> <p>Gillian Allison (SLDP_1012), S. Profili (SLDP_1275) and Patricia Profili agree that the site should not be identified as an additional housing allocation option, citing green belt; constrained infrastructure; narrow vehicular and pedestrian access along Glen Road with little scope to widen; lack of school provision; existing walking route to Bridge of Allan.</p> <p>Cycle Stirling (01039) and B. Clark (SLDP_1154) note that Glen Road, as a popular part of the NCN 765 from Dunblane to Bridge of Allan for walkers, runners, and cyclists, is too narrow to accommodate further development. It is observed that parked vehicles regularly block pavements, creating safety issues for pedestrians. B. Clark also raises issues relating to the Minnie burn network and surface water flooding.</p> <p><b>Schools</b></p> <p>One pupil from Dunblane High School commented on the site at an engagement session held on 23<sup>rd</sup> October with year 4/5 pupils. Niamh Proctor (01681) raised concerns over the appearance of modern housing. Overall at Dunblane High School, 3 pupils did not support development of this site, 9 did not know or had no view, while 2 pupils did support development.</p> <p><b>Drop-in Sessions</b></p> <p>14 - Do not support development on the site  1 - Unsure  0 - Support development on the site</p>			
<b>Stirling Council Response:</b>			
This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the			

reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.

Responses received to the MIR and summarised above support both the allocation and non-allocation of the site, with the majority view not supporting development. The landowner is seeking removal of the site from the green belt and allocation of the site for residential development.

The Council remains of the view that the assessment of the site set out in the MIR is valid and the site should not be allocated for housing development. Development would extend the settlement edge and have an impact on the character and setting of Dunblane. The potential for new housing in Dunblane is significantly constrained by school capacity and the Council's preferred additional sites are at Barbush (80 units) and Hillside (15 units). Together with alternative sites allocated by the proposed plan, sufficient housing land has been identified.

The site is not identified as a housing site in the proposed plan and is retained as Green Belt.

<b>Ref.</b>	30	<b>SHERIFFMUIR ROAD, DUNBLANE (DUN03)</b>	
<b>Representations by:</b>			
SLDP_70 – Kippendavie Group Trust		01039 – Cycle Stirling	
SLDP_1012 – Gillian Allison		01545 – Patrica Profili	
SLDP_1154 – B. Clark		01681 – Niamh Proctor	
SLDP_1275 – S. Profili		<b>Total No.</b>	7
<b>Summary of Comments:</b>			
Kippendavie Group Trust (SLDP_70) are promoting development upon three sites in their ownership on the east/south-east edge of Dunblane, including Sheriffmuir Road (DUN03).			
With regard to the MIR site assessment, it is countered that the site is not located within an area of flood risk as defined on the SEPA flood map and as such the management of surface water should not be viewed as a constraint and that the site has the potential to foster non-vehicular travel patterns to key facilities and amenities, including the railway station, town centre and schools by virtue of its location and existing footpath network. It is recognised that the character of the location leads to low density, groupings of future residential development and submitted that drainage capacity exists for phased, low density development.			
Kippendavie Group Trust seek removal of the site from the green belt to allow for future development linked to maintaining an effective land supply/to meet future housing needs. This would be consistent with the preferred option of meeting housing demand and managing this through a balanced approach to the location of new housing across the Core Area and Dunblane's role as a Core Area Tier 2 settlement. Development would also support town centre investment initiatives.			
Gillian Allison (SLDP_1012), S. Profili (SLDP_1275) and Patricia Profili agree that the site should not be identified as an additional housing allocation option, citing impact on amenity, biodiversity and Dykedale Wood; constrained infrastructure; narrow vehicular and pedestrian access along Glen Road with little scope to widen; and lack of school provision.			

Cycle Stirling (01039) and B. Clark (SLDP\_1154) note that Glen Road, as a popular part of the NCN 765 from Dunblane to Bridge of Allan for walkers, runners, and cyclists, is too narrow to accommodate further development. It is observed that parked vehicles regularly block pavements, creating safety issues for pedestrians. B. Clark also raises issues relating to the Minnie burn network and surface water flooding.

**Schools**

One pupil from Dunblane High School commented on the site at an engagement session held on 23<sup>rd</sup> October with year 4/5 pupils. Niamh Proctor (01681) raised concerns over the appearance of modern housing. Overall at Dunblane High School, 4 pupils did not support development of this site, 7 did not know or had no view, while 4 pupils did support development.

**Drop-in Sessions**

15 - Do not support development on the site  
 1 - Unsure  
 0 - Support development on the site

**Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.

Responses received to the MIR and summarised above support both the allocation and non-allocation of the site, with the majority view not supporting development. The landowner is seeking removal of the site from the green belt and allocation of the site for residential development.

The Council remains of the view that the assessment of the site set out in the MIR is valid and the site should not be allocated for housing development. The site's position, rural character and surrounds mean development of this site, which is detached from the urban area, would be prominent in the landscape.

The potential for new housing in Dunblane is significantly constrained by school capacity and the Council's preferred additional sites are at Barbush (80 units) and Hillside (15 units). Together with alternative sites allocated by the proposed plan, sufficient housing land has been identified.

The site is not identified as a housing site in the proposed plan and is retained as Green Belt.

<b>Ref.</b>	31	<b>BUNRSIDE, KIPPEN (KIP02)</b>	
<b>Representations by:</b>			
SLDP_93 – Kippen Community Council 00357 – Richard Waddell 01424 – R M Muir-Simpson 00340 – Margaret Sutherland		01410 – David Wright SLDP_156 – Rural Stirling Housing Association	
		<b>Total No.</b>	6
<b>Summary of Comments:</b>			
<u>Support allocation</u> Kippen Community Council (SLDP_93)			

Support allocation of this site over other assessed site (KIP01), however question the need to identify further housing sites in the village. Seek clarification on when development likely to proceed.

Rural Stirling Housing Association (SLDP\_156)

Consider the site as having many favourable attributes and support allocation of the site. However RSHA expresses the view that they would welcome the site to be brought forward for development in Period 1 Phase 1 (2017-2022) rather than the Period 1 Phase 2 (2022-2027) identified in the MIR, should appropriate circumstances prevail. Note the constraints highlighted in the Key Site Requirements of the adopted LDP and would expect these to be addressed early by a development appraisal.

#### Site Access

R M Muir-Simpson (01424)

Raises concerns over access, citing that current access arrangements would need to be upgraded to cope with future development.

#### Infrastructure Constraints

Richard Waddell (00357), R M Muir Simpson (01424), Margaret Sutherland (00340), David Wright (01410)

Raise concerns over impact of development on education capacity, water and sewerage networks, health facilities.

#### Housing type and tenure

Richard Waddell (00357)

Concerned over lack of affordable homes and the expensive private lets currently in the village.

David Wright (01410)

Is of the view that the Government has decreed that more affordable housing be made available. Suggests that most of the recent development in the village is not meeting this.

R M Muir Simpson (01424)

Suggests that a degree of rebalancing of local authority and private properties is needed in light of recent local authority additions.

Rural Stirling Housing Association (SLDP\_156)

Consider the site as a good location for affordable housing

#### **Drop in Sessions**

10 – Do not support development of this site

2 – Unsure

8 – Support development of this site

#### **Stirling Council Response:**

##### Support allocation

Support from Kippen Community Council (SLDP\_93) and Rural Stirling Housing Association (SLDP\_156) noted. This site is allocated for housing development in the Proposed Plan.

Kippen, along with many of the eastern rural villages, was allocated on average 40-50 units at the last LDP in line with the spatial strategy and projected need and demand. KIP02 Burnside was identified as part of this process and is shown in the current LDP as H103 Burnside, with 30 units, as a Period 2 (Post 2024) allocation. The MIR does not

seek to identify any additional housing sites in the village, but does seek to bring development of the site forward into Period 1 Phase 2 of the next LDP (2022-2027).

Primarily the site is identified for phase 2 of period 1 due to education constraints, however if these can be overcome to the satisfaction of the education authority there would be no planning reason why in principle the site could not deliver sooner than expected.

Site Access

It is unclear at the present time exactly where access to the site would be taken from. However this can be discussed with the transport department prior to an application being submitted to ensure that appropriate access and remediation measures are identified.

Infrastructure Constraints

Scottish Water have not raised any concerns over water or drainage by the development. However, they did note at Pre MIR stage that the waste water treatment works has limited capacity for new development. It is noted in the Key Site Requirements that a Flood Risk Assessment would need to be carried out and that mitigation measures may be required.

The Education Authority note that further development in the village, in addition to this site, would place pressure on Kippen Primary School.

Whilst capacity at local medical facilities are a concern, no response was received to consultation requests from NHS Forth Valley. The Council remains committed however to working with NHS Forth Valley to highlight where new development is expected to take place.

Housing Type and Tenure

The Council accepts and acknowledges the need for more affordable housing. In line with current national policy, SPP (2014), the Council would seek to ensure that any development in Kippen would contribute to affordable housing. LDP Policy 2.2: Planning for Mixed Communities and Affordable Housing sets out the preferred approach to development. In general a wide range of house types and sizes would be sought on the site and as Kippen is identified as a Highly Pressured Housing Area there would be a requirement for an affordable housing contribution of 33% (approx. 10 units), preferably provided on site. Early contact with the Housing department is advised.

<b>Ref.</b>	32	<b>STRATHBLANE &amp; BLANEFIELD – GENERAL</b>	
<b>Representations by:</b>			
SLDP_102 - Strathblane Community Council		01462 - Fiona Murray	
SLDP_1319 - W.M. Oswald		01464 - Philip Graves	
01039 - Cycle Stirling		01537 - Sylvia Armstrong	
		<b>Total No.</b>	6
<b>Summary of Comments:</b>			
SLDP_102 - Strathblane Community Council Support rejection of sites SBL 01, 02, 03, 04, 05 and 07 for the reasons given in the site assessments. However, the problem remains that insufficient housing land is identified.			
SLDP_1319 - W.M. Oswald			
i) Totally agree with suggestion sites SBL 01, 02, 03, 04, 05 and 07 should not be developed.			

- ii) Significant need for smaller low cost houses for rent, shared ownership and outright purchase. Stirling Council needs to look imaginatively at its estate to what ground could be released for social housing.
- iii) Land Reform Bill may offer an avenue for communities to acquire land, in conjunction with Stirling Council and the Rural Stirling Housing Association, on the outskirts of the village, though this is likely to be green belt, though other options could be explored.
- iv) MIR omits to address issue of overspill cemetery at Campsie Road.

01039 - Cycle Stirling

Crucial missing link of 2-3 miles on the busy A81, between NCN 754 and NCN 7. Local and cycle tourists would be attracted to cycle between rural communities and local tourism would benefit if this important link was made off the main road. If any developments are approved a priority contribution should be to complete this link.

01462 - Fiona Murray

- i) Wish to comment on why the field between Blanefield Nursing Home and Ballewan Crescent is not on the plan for discussion.
- ii) Pleased with the mix of private and housing association housing on construction site at Campsie Road.
- iii) Any site central to the village should be identified for affordable housing only.
- iv) A study could look at the feasibility of establishing a hub for library, surgery and other meeting place for the village to ensure long stability for the community and village.

01464 - Philip Graves

Support refusing to allow building in the green belt in the area of Mugdock, despite pressure from the same applicants that have already been turned down at appeal. Request 'village' signs be removed.

01537 - Sylvia Armstrong

Support exclusion of green belt sites, which is in line with previous planning decisions and planning appeals. The green belt preserves and secures the rural nature of the village.

**Stirling Council Response:**

Supporting comments are noted.

The Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development. Overall the Strategy supports only modest growth in the 'Western Villages' including Strathblane/Blanefield. The PSLDP's Placemaking and Site Planning Criteria emphasise the importance of good design.

With reference to the comments of 01039 - Cycle Stirling whilst there is merit in the concerns raised it is not appropriate to seek off-site improvements to local active travel routes on the basis of the small scale allocations set out in the PSLDP.

<b>Ref.</b>	33	<b>TRANSPORT</b>
<b>Representations by:</b>		
SLDP_151 – Network Rail	00711 – Stirling Council SNP Group	
SLDP_188 – Scottish Government	01039 – Cycle Stirling	

SLDP_193 – Tactran	01673 – Craig Anderson	
SLDP_324 – University of Stirling	<b>Total No.</b>	6
<b>Summary of Comments:</b>		
<p>Network Rail (SLDP_151) recommend that the LDP continues to provide support for a bridge replacement of two level crossing (Cornton No. 1 &amp; No. 2) as an alternative barrier solution would not sufficiently reduce risk at the crossings and that the Kildean Link Road is required to deal with forecast traffic demand in the wider area. State no sites should be allocated for development which either physically impact on the ability to provide a bridge or which would increase traffic over the crossing in advance of the construction of a bridge.</p> <p>State due consideration should be given to the impacts that new development may have on the existing rail network and highlight it would be appropriate to require contributions towards rail infrastructure where they are directly required as a result of proposed development.</p> <p>Requested that further consideration is given to the need to identify additional rail infrastructure to accommodate increased rail patronage.</p> <p>Scottish Government (Transport Scotland) (SLDP_188) consider the ongoing DPMTAG process as important exercise as the previous modelling undertaken by the council estimated that only 57% of the Adopted LDP allocations could be developed prior to severe congestion on the transportation network.</p> <p>The specific impact of the spatial strategy requires to be investigated with appropriate transport interventions identified to enable the full LDP allocations to be accommodated satisfactorily on the local and strategic network.</p> <p>It is reiterated that the transport appraisal process should determine the appropriate infrastructure required to deliver the land use strategy. In respect to the proposed junction between the M9 and A811, it should be noted SPP (para 275) states: “Development plans should identify any required new transport infrastructure or public transport services, including cycle and pedestrian routes, trunk road and rail infrastructure. The deliverability of this infrastructure, and by whom it will be delivered, should be key considerations in identifying the preferred and alternative land use strategies”.</p> <p>Transport Scotland would welcome the opportunity to comment on any draft policies or documents prior to formal consultation. It is hoped this will assist the Council progress the plan more smoothly and reduce the number of issues which could potentially be raised at a later date.</p> <p>TACTRAN (SLDP_193) state reference should be made to the refreshed Regional Transport Strategy.</p> <p>University of Stirling (SLDP_324) supports enhanced and interlinked transport services as a means of ensuring that the University is properly connected to the City and beyond.</p> <p>Stirling Council SNP Group (00711) indicate concern over the review of transportation policies, particularly relating to modal shift.</p> <p>Cycle Stirling (01039) state that cycling should be given a high priority to maximise modal shift and development (and developers) should address local barriers to active travel and strategic cycling links. Routes should be integrated more effectively with green networks, aiming to be safe, convenient, attractive and linked to everyday destinations and</p>		

attractions. Effective cycling networks provide many local benefits: connecting rural communities, reducing car dependence and attracting tourists.

Craig Anderson (01673) has observed that recent works on Causewayhead have served to highlight the infrastructure dependency upon that road and the impact of there being only two railway crossings in the area. Suggests the small pedestrian level crossing on Easter Cornton Road in upgraded to a full level crossing and the road infrastructure improved as this could ease the burden on Causewayhead.

**Stirling Council Response:**

The Council has commissioned SIAS Limited (SIAS) to carry out a Transport Appraisal to support the Local Development Plan. The Appraisal is aligned with DPMTAG process and examines all modes of travel including rail, bus, road, and active travel (walking and cycling) connections. The Appraisal outcomes support and inform the Council’s vision for its LDP strategy and how the various development allocations could impact on both the local and strategic transport networks. The study identifies the potential impact of the spatial strategy, how these impacts can be mitigated and sets out ‘packages’ of transport interventions required to deliver the strategy.

See Transport Background Report for further details.

The LDP provides support for a bridge replacement of two level crossings (Cornton No. 1 & No. 2), listing it as in infrastructure proposal and safeguarding land for this purpose.

Developer Contributions will be sought to address the impact of new development on transport networks and to ensure new development is has safe and realistic access choices, in accordance with Policy 3.3 and SG14.

<b>Ref.</b>	34	<b>SOUTH OF FISHER PLACE, BUCHLYVIE (BUC01)</b>	
<b>Representations by:</b>			
SLDP_178 – Sportscotland SLDP_126 – Scottish Water SLDP_76 – Buchlyvie Community Council		SLDP_156 – Rural Stirling Housing Association 01619 – Douglas Scobbie	
		<b>Total No.</b>	5
<b>Summary of Comments:</b>			
<p>Scottish Water (SLDP_126) note that there is currently capacity for this development, although possible further investigation required on local network. Recommended developer contact Scottish Water as early as possible.</p> <p><u>Access</u> Sportscotland (SLDP_178) Note that the site is adjacent to Buchlyvie Primary School and raise concern that development of the site would need to be designed to ensure that access to the pitch, both during and post construction, is not affected.</p> <p>Buchlyvie Community Council (SLDP_76) Raise concerns that access would be taken through the existing school site and would result in a loss of the wildlife garden and open space. In addition they raise concern that this access would result in the loss of parking provision for the school/health centre.</p> <p>Rural Stirling Housing Association (SLDP_156)</p>			

See merit in the development potential of this site but agree with the Council's identification of the site as a Period 2 (Post 2027) site to allow for access issues to be overcome.

Douglas Scobbie (01619)

Contents that the site can be developed sooner than the Period 2 identification suggested by the MIR. States that the School, from where the access is likely to be taken, is in the ownership of the Council and it should not take 9 years to resolve this issue.

#### Education Constraints

Rural Stirling Housing Association (SLDP\_156)

See merit in the development potential of this site but agree with the Council's identification of the site as a Period 2 (Post 2027) site to allow for education constraints to be overcome.

Douglas Scobbie (01619)

Question the capacity constraints identified in the Site Assessment and point to the Report of Examination into the adopted LDP that concluded that while there are capacity issues at the primary school, there are management measure that could be employed. Also notes that the reporter was of the opinion that since the Montgomery Place allocation was to be deleted from the adopted plan it would be unlikely that capacity issues would arise during the plan period. Contend that as such there should be no impediment in the development of a much smaller site.

#### **Stirling Council Response:**

The response from Scottish Water (SLDP\_126) is noted.

#### Access

The Council supports and agrees with Sportscotland's (SLDP\_178) submission that access should be maintained at all times both pre and post construction should the site be developed. The Council will include this within the Key Site Requirements in the Proposed Plan.

The Council acknowledges that the school site is in the ownership of the Council as stated by Douglas Scobbie (01619). However, it has yet to be demonstrated through the submitted information that the concerns over securing this access and mitigating the loss of the current open space can be overcome within the plan period. The concerns raised by the Community Council (SLDP\_76) are shared by the Council and warrant further consideration to satisfy all parties that the site can be safely and adequately accessed and any negative impacts of doing so are satisfactorily mitigated.

#### Education Constraints

At pre MIR consultation the Education Authority was consulted on all sites submitted as part of the call for sites stage. The school was reported to not have any spare capacity to accommodate pupils from the proposed development. Acknowledge the reporters comments, however the education picture has moved on since that time and school roles fluctuate. The developers are advised to contact the Education Authority to discuss further what, if any, measures could be put in place to allow the development to proceed.

#### Summary

As noted in the site assessment the Council does see merit in the development of this site and such development would allow for the provision of affordable housing in line with policy. However, there are access and education constraints that need to be overcome to allow development. It is not clear at the present time how these could be overcome.

The Council has a housing shortfall and it is recognised that more land for housing needs to be identified. As part of this process and to address the shortfall the Council has to have regard to a sites effectiveness and ability to be developed within the plan period. On balance it is not considered that this site is currently in a position to demonstrate this.

In order to safeguard the site and to signify the Council's longer term view that the site could be developed, it is proposed to allocate this site in the LDP as a period 2 (Post 2027) site. This period 2 allocation will be considered at the next review of the development plan, where it may be appropriate to identify the site earlier than currently indicated or to remove the site completely.

<b>Ref.</b>	35	<b>ABERCROMBY DRIVE, BRIDGE OF ALLAN (BOA05)</b>	
<b>Representations by:</b>			
01628 – Ami Thomson 01630 – Lewis Goldie 01627 – Jgorg Jvonovo		01652 – Jake Gilmour SLDP_175 – SEPA	
		<b>Total No.</b>	5
<b>Summary of Comments:</b>			
SLDP_175 (SEPA) requests removal of the site for flood risk reasons.			
<u>School pupils</u> 01628, 01630 and 01652 are generally supportive of the site stating that it would constitute a continuation from the existing built up area and that this land is not currently in use. Development at this location would not result in a significant change to the area.			
01627 is of the view that there is already a large population in this area so does not necessarily support the site being developed.			
Overall 4 would support development on this site.			
<b>Drop in Sessions</b> 2 – Would not support development on this site 0 – Unsure 0 – Support development on this site			
<b>Stirling Council Response:</b>			
This site was promoted through the call for sites process but was not identified as an option for residential development in the MIR.			
Whilst the statements of support are noted, the Council is of the view that this is not a suitable site for housing development given its potential to impact adversely on the established character of the conservation area. SEPA also objects to the site for flood risk reasons.			
The Council has also identified sufficient housing land on alternative sites meaning that in terms of housing land supply, there is no need to identify this site for residential development in the proposed plan.			

<b>Ref.</b>	36	<b>CLAREMONT DRIVE, BRIDGE OF ALLAN (BOA04)</b>
<b>Representations by:</b>		
01628 – Ami Thomson 01630 – Lewis Goldie	01627 – Jgorg Jvonovo 01652 – Jake Gilmour	
	<b>Total No.</b>	4
<b>Summary of Comments:</b>		
<p><u>School pupils</u> 01628, 01630, 01627 and 01652 are generally supportive of development of the site stating that it would constitute a continuation from the existing built up area and that this land is not currently in use. Development at this location would not result in a significant change to the area and this area is much less populated.</p> <p>Overall, 4 would support development on this site.</p> <p><b>Drop in Sessions</b> 1 – Would not support development on this site 0 – Unsure 0 – Support development on this site</p>		
<b>Stirling Council Response:</b>		
<p>This site was promoted through the Call for Sites process but was not identified as an option for residential use in the MIR.</p> <p>Whilst the statements of support are noted, the Council is of the view that this is not a suitable site for housing development given its potential to impact adversely on the established character of the conservation area. SEPA also objects to the site for flood risk reasons.</p> <p>The Council has also identified sufficient housing land on alternative sites meaning that in terms of housing land supply, there is no need to identify this site for residential development in the proposed plan.</p>		

<b>Ref.</b>	37	<b>SOUTH EAST OF CLAREMONT DRIVE, BRIDGE OF ALLAN (BOA06)</b>
<b>Representations by:</b>		
01628 – Ami Thomson 01630 – Lewis Goldie	01627 – Jgorg Jvonovo 01652 – Jake Gilmour	
	<b>Total No.</b>	4
<b>Summary of Comments:</b>		
<p><b>Schools</b> 01628, 01630 and 01652 are generally supportive of the site stating that it would constitute a continuation from the existing built up area and that this land is not currently in use. Development at this location would not result in a significant change to the area.</p> <p>01627 is of the view that there is already a large population in this area so does not necessarily support the site being developed.</p> <p>Overall, 4 would support development on this site.</p>		

**Drop in Sessions**

8 – Would not support development on this site

0 – Unsure

9 – Would support development on this site

**Stirling Council Response:**

This site was promoted through the call for sites process but was not identified as an option for residential development in the MIR.

Whilst the statements of support are noted, the Council is of the view that this is not a suitable site for housing development. It would create development that was prominent within an important transitional landscape, appearing as an incongruous part of the setting of Upper Bridge of Allan and the conservation area. It is considered unlikely that the site could be developed for the promoted 20 units because the topography of the site gives rise to surface water flooding issues.

The site is not identified as a housing site in the proposed plan.

<b>Ref.</b>	38	<b>EAST OF KIPPENDAVIE ROAD, DUNBLANE (DUN04)</b>	
<b>Representations by:</b>			
SLDP_70 – Kippendavie Group Trust		01681 – Niamh Porter	
SLDP_1012 – Gillian Allison		01692 – Ellen Pennie	
SLDP_1154 – B. Clark		01695 – Sophie Gilchrist	
SLDP_1275 – S. Profili		01696 – Iona Grant	
01039 – Cycle Stirling		<b>Total No.</b>	9
<b>Summary of Comments:</b>			
<p>Kippendavie Group Trust (SLDP_70) are promoting development upon three sites in their ownership on the east/south-east edge of Dunblane, including East of Kippendavie Road (DUN04). The site extends to approximately 19 ha and is subject to a current application (13/00453/PPP), which includes up to 165 houses comprising a wide range of choice and tenure through a mix of self-build, retirement, market and affordable housing on the site. A building group approach is proposed which consolidates development into areas, retaining wide areas of open space and structural planting that is set within a framework of pedestrian and cycle links.</p> <p>Kippendavie Group Trust maintain that land to the east of Dunblane has the greatest potential of all sites on the urban edge to deliver sustainable, place led development by virtue of its location close to key amenities, landscape capacity, surrounding land uses and infrastructure capacity to accommodate new development. It is argued that an agreed phasing strategy would overcome any infrastructure constraints, e.g. relating to school capacity; the development would not place existing or proposed properties at risk of flooding; there is capacity in the drainage and water network for phased development with on-site water storage; and the local and truck road network can accommodate additional traffic.</p> <p>Reference is made to the 2009 Green Belt Review which proposed that for Dunblane's eastern edge, the green belt should be drawn along the mature shelter belt which forms the outer boundary of site DUN04, reflecting both landscape considerations, the results of the 1991/92 public inquiry into future green belt boundaries and the provisions of the SPP that green belt designations should direct future development and therefore not be tightly</p>			

drawn around a complete settlement and Stirling Council's previous acceptance of the locational merits of this site.

Kippendavie Group Trust seek removal of the site from the green belt; allocation of part of the site (Area 1) for residential development of c.100 units; and support within the LDP for the phased development of the remainder of the site.

Gillian Allison (SLDP\_1012) agrees the site should not be an additional housing allocation option, referring to biodiversity and routes to Sheriffmuir.

B. Clark (SLDP\_1154) and Cycle Stirling (01039) reference the need to link south with the core path between Leighton Avenue and Dykedale Farm.

S. Profili (SLDP\_1275) would have no objection to development of the site subject to the provision of a new primary school as considers Newton Primary to be at capacity.

### **Schools**

Four pupils from Dunblane High School commented on the site at an engagement session held on 23<sup>rd</sup> October with year 4/5 pupils. Sophie Gilchrist (01695) and Iona Grant (01696) specifically expressed disagreement with the development of this site. Niamh Proctor (01681) observed this is an attractive part of Dunblane where many people walk and enjoy the view. Ellen Pennie (01692) referred to the abundant wildlife that depends on habitats located within the site.

Overall, at Dunblane High School, 17 pupils did not support development of this site, 4 did not know or had no view, while 2 pupils did support development.

### **Drop-in Sessions**

17- Do not support development on the site

5- Unsure

1 - Support development on the site

### **Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.

Responses received to the MIR and summarised above support both the allocation and non-allocation of the site, with the majority view not supporting development. The landowner is seeking removal of the site from the green belt; allocation of part of the site for residential development of c.100 units; and support within the LDP for the phased development of the remainder of the site.

The Council remains of the view that the assessment of the site set out in the MIR remains valid and the site should not be allocated for housing development. The landscape impact of extending development would have a detrimental impact on the character and setting of Dunblane.

Development within Dunblane is significantly constrained by school capacity and the Council's preferred additional sites are at Barbush (80 units) and Hillside (15 units) which limits release of any further land at this time.

The site is not identified as a housing site in the proposed plan and is retained as Green Belt.

<b>Ref.</b>	39	<b>IBERT FARM, KILLEARN (KIL01)</b>
<b>Representations by:</b>		
SLDP_89 - Killearn Community Council SLDP_178 - sportscotland	00819 - Sir Archie Edmonston 01314 - Brenda Pell	
	<b>Total No.</b>	4
<b>Summary of Comments:</b>		
<p>SLDP_89 - Killearn Community Council - We note options to develop sites KIL01- Ibert Farm, KIL02 - Dumgoyne KIL03 - Lampson Loan and KIL04 - Lampson Road, are deemed not suitable within the plan.</p> <p>SLDP_178 - sportscotland - The KIL01 site is adjacent to existing tennis courts at Greenend Lane. Any development would need to be appropriately designed to ensure no conflict between uses. sportscotland likely to be a statutory consultee if a planning application were to be submitted and provisions of SPP paragraph 226 would apply.</p> <p>00819 – Sir Archie Edmonston The 11.6 ha site at Ibert Farm, Killearn not currently supported as an option. Would like a smaller revised segment of this site (approx. 5.5 ha) to be considered.</p> <p>This will provide greater potential to integrate with the surrounding townscape of Killearn, enable development at a more appropriate scale, be more respectful of the setting and density of the village, and allow a more sensitive transition between the conservation area and Southern Hills Local Landscape Area. It is also considered this location represents the most deliverable site which is capable of meeting sustainable expansion principles, as set out in the Spatial Strategy Development Approach. An appropriate allocation in this location will also help towards meeting housing demand in the Stirling rural villages.</p> <p>01314 – Brenda Pell Suggested sites KIL01- Ibert Farm, KIL02 - Dumgoyne KIL03 - Lampson Loan and KIL04 - Lampson Road, have been rejected as possible options for various reasons but all suggest Killearn is not a suitable village for major housing development and this would be supported by the majority of the inhabitants.</p>		
<b>Stirling Council Response:</b>		
<p>A larger site submitted at the 'call for sites' stage extended to 11.6 ha and was subject to a detailed site assessment, as set out in the MIR (Ref:- KIL01). For the reasons given it was concluded it was not appropriate to identify the site as an 'option' for consideration in the MIR.</p> <p>Comments received in response to the MIR consultation are summarised above. Comments from 00819 – Sir Archie Edmonston relate to a reduced site area (approx. 5.5 ha) and generally seek to persuade the Council there are planning considerations of sufficient weight to support the allocation of the site for residential development in the Proposed Stirling Local Development Plan (PSLDP).</p> <p>Remaining comments support the conclusion of the MIR that the site should not be identified as a housing option.</p> <p><u>Spatial Strategy and Housing Land Requirement</u> At 5.5 ha this greenfield site has a potential capacity for c.150 units.</p> <p>The MIR states the underlying aims of the Spatial Strategy, as set out in the current adopted SLDP, were not being altered in the PSLDP. Having taken full account of all</p>		

comments submitted in response to the MIR consultation the Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development. In particular the housing land requirement set out in the LDP fully complies with the policy principle set out in Scottish Planning Policy to identify a generous supply of housing land across all tenures, maintaining at least a 5-year supply of effective housing land at all times.

Taking account also of the housing allocation H102 - Blairessan there therefore is currently no demonstrable need for the PSLDP to allocate any additional housing land in Killearn.

Other considerations

As highlighted in in the site assessment, it remains the case, even at 5.5 ha, this reduced scale of housing development raises significant implications for local social infrastructure such as schools and health care. Notwithstanding commentary in the supporting submission, taking account that the site lies within the Southern Hills Local Landscape Area there remains significant concerns over potential adverse impacts of site development on the wider landscape setting of village and the more immediate setting of the adjacent Killearn Conservation Area. Potential arrangements for safe vehicular access to the site also have not been confirmed. Indicative proposals to demolish a building on Balfron Road to allow the formation of a new road junction are unlikely to be acceptable on public safety grounds.

Other comments have been noted and are addressed by the recommendation not to allocate the site for housing.

<b>Ref.</b>	40	<b>FORMER MFI, STIRLING (STR17)</b>	
<b>Representations by:</b>			
01409 – Andrew Simpson 01428 – William Dingwall 01578 – Chris Waring 01662 – Kate Fuller		01039 – Cycle Stirling SLDP_126 – Scottish Water	
		<b>Total No.</b>	6
<b>Summary of Comments:</b>			
<u>Support Allocation</u> Andrew Simpson (01409), William Dingwall (01428), Chris Waring (01578), Kate Fuller (01662) Express concern over current appearance and use of the site. Would prefer the site to be developed.			
<u>Site Layout and Design</u> Andrew Simpson (01409) Would prefer to see detached/semi-detached housing on the site and not a flatted development. Would like to see open space incorporated into the design and for retail units to be provided along the Glasgow Road frontage. Layout should also include linkages through the site.			
<u>Transport and Access</u> William Dingwall (01428)			

Suggests that vehicular access to the site is restricted to Polmaise Avenue or Maitland Crescent.

**Cycle Stirling (01039)**

Suggest that the inclusion of a cycle/pedestrian crossing point on Glasgow Road would provide an important link between the cross city cycle route and local cycling routes.

Water and Waste Infrastructure

Scottish Water (SLDP\_126)

Note that the developer has already been in contact with Scottish Water and flow and pressure tests are being carried out. Note that there is capacity at the Waste Water Treatment Works but there are potential network requirements and further investigation is needed.

**Drop in Sessions**

0 – Would not support development of this site

0 – Unsure

3 – Would support development of this site

**Stirling Council Response:**

Support Allocation

Responses noted. This site is allocated in the Proposed Plan.

Site Layout and Design

Since identification in the Main Issues Report an application (15/00581/FUL) has been submitted. The submitted designs show a mix of detached/semi-detached and flatted accommodation along with up to 4 retail units fronting Glasgow Road. The drawings appear to show a pedestrian link from the development to Glasgow Road.

Transport and Access

The submitted drawings show that the proposed vehicular access is to be from Maitland Crescent. There is no provision within the submitted application for an additional crossing point on Glasgow Road. However, the transport department have yet to provide comments on the application.

Water and Waste Infrastructure

The comments from Scottish Water (SLDP\_126) are noted.

<b>Ref.</b>	41	<b>NEWPARK, CULTENHOVE (STR22)</b>
<b>Representations by:</b>		
01427 – Ian Bennett	SLDP_321 – Ogilvie Homes	
	<b>Total No.</b>	2
<b>Summary of Comments:</b>		
<u>Principle of allocation</u>		
Ian Bennett (01427)		
Questions why this site is being promoted for development ahead of other brownfield sites in the area. Raised concern over where the proposed access is going to be, citing current issues in Sauchie Street. Concerned over current flooding to rear of properties in Sauchie Street and how this development will affect or can improve this issue.		

Ogilvie Homes (SLDP\_321)

Acknowledge the Council's intention to increase the allocation numbers on this site and view it as a positive step. However, contend that the site could take more units, approx.. 190 and should be allocated for such. Propose that the Council could allocate an additional 90 units, instead of the current 50, and spread these over the plan period by identifying 50 units in phase 1 (2017-2022) and 40 units in phase 2 (2022-2027). Note that the site appears to now be classed as an Urban Consolidation site and further reason that the site should be afforded priority over other developments by increasing the capacity and designating the site as Strategic Development.

Consider that the site can be developed flexibly to take account of market needs, such as for smaller or larger house types as the development proceeds over time. Point to the site being sustainable in terms of location and can assist in the delivery of the spatial strategy.

Site Assessment

Ogilvie Homes (SLDP\_321)

Raise concerns over the Council's approach to identifying the increased number and contend there is no sound planning base for arriving at the figure of 150 units. Concerned that this restricts the capacity of the site when they are of the opinion that the true capacity of the site is closer to 200.

Current planning application

Ogilvie Homes (SLDP\_321)

Make reference to the current application under consideration and provide extracts from the submission as a supporting statement (15/00669/FUL).

**Stirling Council Response:**

Principle of Allocation

The site is identified in the current LDP as site H058 Newpark for 100 units, phased for 50 units 2010-2019 and 50 units 2019-2024. The LDP allocates a range of sites to ensure a choice of sites are available for development. It was, and is, the preference of the Council to seek to direct development to brownfield sites in the first instance. However, in order to meet projected need it was also necessary to allocate greenfield sites. A large area of Culterhove is already allocated in the LDP for development over the lifetime of the plan for 100 units. This includes the cleared sites at Graystale Road and Gateside Roads. Development in this area is ongoing with both Forth Housing Association and Stirling Council having development either complete, under construction or planning applications under consideration.

Access to the site is anticipated to be from Gateside Road, as per the Culterhove Masterplan.

The Key Site Requirements for the site in the LDP also note the need to carry out a Flood Risk Assessment and this would be done via a planning application.

The support from Ogilvie Homes over increasing the site capacity is noted. With regard to capacity it is not considered appropriate at this stage to allocate the site for 190 units as this number of units has not been confirmed as acceptable. The planning application submitted is for 190 units, however this is still under consideration and no decision reached at time of writing.

With regard to the site now being classed as Urban Consolidation from Urban Regeneration in the current plan, we would clarify that this is not the case. It is accepted that the way the site is presented in the MIR does not make clear the linkages between

the spatial strategy and the proposed allocations and this will be resolved in the Proposed Plan. To clarify, the site would fall under Core Area: Regeneration due to the sites location in St Ninians/Cultenhove.

It is not accepted that the site should be considered as Strategic Development as the scale and location of the development does not warrant such a designation.

The comments from Ogilvie homes regarding the commitment to ensuring an appropriate mix of house types on the site are welcomed and supported.

#### Site Assessment

As stated above the Newpark site is an existing allocation that is proposed to be carried forward into the next plan, but with an increase in units. At pre MIR a call for sites was issued inviting developers, land owners and community groups to put forward sites for consideration for development in the next plan. At this stage officers were also asked to identify any potential sites or sites that could potentially achieve an acceptable higher density. No representation to this stage was received from Ogilvie relating to an increase in density at the Newpark site.

Officers had identified that this site could potentially take more units after reviewing previous correspondence on the LDP, the Reporters Report and correspondence through the Council's annual Housing Land Audit. Officers noted previous assertions from Ogilvie that the site could be developed for approx. 200 units. At examination of the LDP, the reporter concluded that the site may be capable of accommodating more units than identified but that this depends on a range of factors. The reporter also notes that the figures in the plan are indicative and that *"it is for prospective developers to produce an acceptable scheme for development of the site that accords with all the planning authority's expectations and LDP requirements. It is not for the LDP to predict or restrict the outcome of that design process, and an increase of the numbers envisaged by the LDP is not justified."* The current application is currently undergoing assessment to test the submitted design for 190 units against the policies in the LDP.

Notwithstanding these comments, it was considered by officers that it is clear that the site could be developed in excess of the numbers identified in the plan and that it would be desirable to update the site capacity for the next plan to reflect this. The figure of 150 units was arrived at by applying a cautionary approach after reviewing the information submitted as part of PAN-2015-005. The Transport Statement submitted, which has also been submitted as part of the application, suggests a *"worst case scenario"* of 200 units on the site for the purposes of the Transport Statement. This, and other considerations outlined above, led officers to believe that the 50 unit increase in site numbers would achieve an appropriate balance in giving certainty to developers and the local community that the site could be developed at a higher density, whilst at the same time acknowledging that the LDP sets only indicative numbers and it would be for a detailed application to determine the final density.

#### Current Planning Application

It is acknowledged that an application (15/00669/FUL) is under consideration and many of the concerns outlined above are being addressed through this process. The outcome of this planning application is as yet unknown, however discussions between Ogilvie and the Council's Urban Design Officer and Transport Officers have demonstrated the site can satisfactorily achieve a higher density than both that stated in the adopted LDP and the MIR. To that end the Council propose to allocate this site for 175 units in the Proposed Plan. This does not pre-empt a decision on the application, through which detailed assessment may demonstrate a higher number being approved.

### Summary

The principle of Newpark being developed for housing is already established by its inclusion in the current Local Development Plan. It is acknowledged that Ogilvie Homes currently have an application under consideration for 190 units. This application is yet to be decided so it would not be appropriate for the LDP to identify the site as capable of taking 190 units. Unit numbers in the LDP are indicative and it is considered that the proposed increase to 175 units in the next LDP sets an appropriate balance signifying the Council's view that increased density on the site is acceptable, whilst leaving it to a detailed consideration of the planning application to decide the final number of units.

<b>Ref.</b>	<b>42</b>	<b>SOUTH OF CAMPSIE ROAD, STRATHBLANE (SBL05)</b>	
<b>Representations by:</b>			
SLDP_102 – Strathblane Community Council		SLDP 1319 - Willie Oswald 01477 – Blair Armstrong	
SLDP_1251 - Charles Connell & Company		<b>Total No.</b>	4
<b>Summary of Comments:</b>			
SLDP_102 – Strathblane Community Council - Support the rejection of this site for the reasons given in the site assessment.			
SLDP_1251 - Charles Connell & Company The land adjoins the settlement boundary and a newly developed housing site. It totals 31 acres and is in grazing use. Part of the site is designated for a new cemetery under primary policy 3.3 of the adopted LDP. The proposed development framework, as shown on supporting plans, has been informed by a landscape assessment and transport study and proposes 30 residential properties of a mix of tenure including affordable housing and a new cemetery. It provides land to meet local needs over the new LDP period on a site accessible by non-vehicular means to the village centre and amenities. The proposed cemetery on the eastern part of the site and will enable a robust, long term green belt boundary to be formed for the village.			
The technical submission made on the 'Call for Sites' in December 2014 confirms the site is technically developable with infrastructure and roads access available. It is recognised a Flood Risk Assessment is required. An archaeological survey should be undertaken and there is potential for enhancing biodiversity as part of the open space strategy.			
The site assessment SBL05 is updated to reflect these points accordingly.			
Further comments on the appropriateness of the continuing allocation of the Durieshill site; maintaining range and choice to meet future housing needs throughout the LDP area, and providing for a minimum 5 year effective housing land supply at all times through the allocation of effective housing sites and the provision of a generosity allowance within the Scottish Planning Policy range are summarised and responded separately under i) Main Issue 1 - Housing Land and ii) Durieshill.			
SLDP 1319 - Willie Oswald - Agree totally with the suggestion that the site should not be developed.			
01477 - Blair Armstrong - Those sites within the green belt should be instantly excluded.			
<b>Drop in Sessions</b>			
15 – Would not support development on this site			
0 – Unsure			

1 – Would support development on this site

**Stirling Council Response:**

This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (Ref: SBL05). For the reasons given it was concluded it was not appropriate to identify the site as an 'option' for consideration in the MIR.

Comments received in response to the MIR consultation are summarised above. Comments from SLDP 1251 - Charles Connell & Company generally seek to persuade the Council there are planning considerations of sufficient weight to support the allocation of the site for residential development in the Proposed Stirling Local Development Plan (PSLDP).

Remaining comments support the conclusion of the MIR that the site should not be identified as a housing option.

In response to these comments:

Spatial Strategy and Housing Land Requirement

This site, in the designated green belt, is proposed for development for 30 low density housing units. A proposed cemetery, allocated in the adopted SLDP and lying within the site boundaries, will be relocated to the east of the proposed residential site, all land being in the same ownership.

The MIR states the underlying aims of the Spatial Strategy, as set out in the current adopted SLDP, were not being altered in the PSLDP. Having taken full account of all comments submitted in response to the MIR consultation the Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development. In particular the housing land requirement set out in the LDP fully complies with the policy principle set out in Scottish Planning Policy to identify a generous supply of housing land across all tenures, maintaining at least a 5-year supply of effective housing land at all times.

Taking account of the newly identified housing allocation H153 - South of A81 and remaining capacity at identified housing allocation H106 - Campsie Road there therefore is currently no demonstrable need for the PSLDP to allocate any additional housing land in Strathblane/Blanefield.

Other considerations

Notwithstanding commentary in the supporting submission there remains significant concerns over potential adverse impacts of site development on the landscape setting and eastern gateway of the village, particularly as the H106 allocation already marks a controlled, but limited, expansion of the village in this direction. The cemetery allocation, as well as being conveniently situated to the village and church, would also result in a more open landscape feature on the eastern approaches to the village, with the housing development immediately to the west establishing a clearly identifiable visual marker for the green belt boundary.

Allocation for residential development would also result in further erosion of the green belt, undermining its important role and function, as set out in SG03 Green Belt.

Other Comments

These have been noted and are addressed by the recommendation not to allocate the site for housing.

<b>Ref.</b>	43	<b>VISION</b>
<b>Representations by:</b>		
SLDP_33 – SNH		SLDP_324 – University of Stirling
SLDP_132 – Forestry Commission		<b>Total No.</b> 4
SLDP_178 - sportscotland		
<b>Summary of Comments:</b>		
<p>SNH (SLDP_33) welcome the continued emphasis on the promotion of good place-making and the refreshed way in which the Vision has been expressed in order to better convey the place-making outcomes desired for the area.</p> <p>The Forestry Commission (SLDP_132) consider where the Vision states Stirling will be ‘a connected, green place’, it would be useful to include the word ‘managed’ e.g. ‘there is an established <u>and managed</u> Green Network of open spaces...’.</p> <p>sportscotland (SLDP_178) welcome the revised presentation of the LDP Vision and consider it to be more succinct, clear and visually interesting.</p> <p>It supports the reference to Stirling as ‘a place of learning and sport’ which recognises the significance of sporting interests and sport education in the Council area, with reference to specific institutions and facilities. Reflect that is important to consider the sporting interests of all users and differing environments for participation and therefore propose that the supporting text to the vision headline reflects this broader remit as follows:</p> <p><b><i>A place of learning and sport: the University of Stirling, Forth Valley College, Stirling Sports Village, and other sporting centres of excellence <u>and sporting communities</u> are established and thriving with an increased number of related businesses, and training opportunities <u>and participation</u>, whilst delivering benefits for health and wellbeing.”</i></b></p> <p>In respect to ‘a connected, green place’ request the following addition to the Vision:</p> <p><b><i>A connected, green place: there is an established Green Network of open spaces, integrated habitats, <u>recreational</u> and active travel routes connecting places and settlements, reconnecting Stirling with its river, and encouraging more people to move around and between them by walking, cycling and public transport.”</i></b></p> <p>The University of Stirling (SLDP_324) supports the concept of placemaking. Have expressed surprise and disappointment that the Vision seems to imply that the University <i>will</i> become a place of learning and sport by 2037 where it is clearly already a place of learning and sport and ask that the presentation of the text and visual is amended.</p>		
<b>Stirling Council Response:</b>		
<p>Comments welcoming the re-presentation of the Vision are noted.</p> <p>The amendments to the wording of text following “Stirling will... be a connected, green place” proposed by the Forestry Commission, regarding the management of the Green Network, and sportscotland on recreational routes, differentiating between functional</p>		

walking and cycling (active travel) and recreational cycling and walking, are agreed. The amended statement should read in full:

“Stirling will be... a connected green place: there is an established and managed Green Network of open spaces, integrated habitats, recreational and active travel routes connecting places and settlements, reconnecting Stirling with its river, and encouraging more people to move around and between them by walking, cycling and public transport”.

Sportscotland’s comments in relation to Stirling as a place of learning and sport and the role of the natural environment in sport are noted, however, it is considered the suggested wording referring to ‘sporting communities’ would be at odds with the Vision’s focus on places and placemaking. It is agreed that reference should be made to increased participation.

With regard to the submission from the University of Stirling, the Vision should be read as follows: “*Stirling* will be... a place of learning and sport: the University, Forth Valley College, Stirling Sports Village and other sporting centres of excellence are established and thriving...”. It is not intended to infer that the *University* is not already a place of learning and sport. It is proposed to delete the word ‘established’ to address any potential confusion regarding the current position.

The updated text would read:

“Stirling will be... a place of learning and sport: the University of Stirling, Forth Valley College, Stirling Sports Village, and other ~~sporting~~ centres of excellence are ~~established and thriving~~, participation in sport and learning has increased alongside the number of related businesses and training opportunities, ~~while~~ delivering benefits for health and wellbeing.”

<b>Ref.</b>	44	<b>KEPCULLOCH ROAD, BALFRON (BAL02 &amp; BAL04)</b>	
<b>Representations by:</b>			
SLDP_230 - CALA Homes (West) Ltd		01575 - Mark McGleish	
01338 - CALA Homes (West) Ltd		<b>Total No.</b>	3
<b>Summary of Comments:</b>			
<p>SLDP_230 - CALA Homes (West) Ltd , 01338 - CALA Homes (West) Ltd            (Note - These comments relate to the land identified as BAL02 in the Main Issues Report Site Assessments (5.64 ha) and an adjoining parcel of land, extending to circa 1.3 ha, to the south west (not previously assessed) and covered by separate comments received from 01575 - Mark McGleish, summarised separately below.)</p> <p>CALA Homes and Mark McLeish commend the sustainable release of land on a site between Kepculloch Road and Station Road, for the following reasons:</p> <ul style="list-style-type: none"> <li>i) There is no continued growth planned in the MIR for Balfron.</li> <li>ii) The site is in the hands of a developer with a track record of delivery within the locale.</li> <li>iii) There is capacity to service the site post 2018.</li> <li>iv) There will be no new housing, without additional release, post 2018 – 2027.</li> <li>v) CALA have taken an option on this site in preference to any alternative being suggested and recognise the potential to continue to stimulate the local economy for a further two phases of development 2018 – 2023/24.</li> <li>vi) The site is vacant, not in any agricultural use and, in effect, urban fringe land.</li> <li>vii) The site is available, marketable, developable and can be serviced.</li> </ul>			

- viii) The environmental issues raised by the Council in their Assessment of the site are either capable of mitigation or matters which are simply subjective and therefore challengeable/questionable.
- ix) The opportunity for continued incremental growth in this key rural settlement is supported by this well enclosed and natural settlement expansion in line with sound, sustainable planning and economic regeneration objectives.
- x) The site could be developed post - 2018 and programmed over successive years to 2024 with a notional capacity of 100 houses subject to detailed masterplanning.

01575 - Mark McGleish

My clients, Messrs Leith, offer and support the release of their land at Station Road, Balfron in order to contribute to the areas housing land requirements. Comments received relate to the site as a single planning unit, though it is noted CALA Homes are the preferred developer. Supporting comments are similar to SLDP\_230 and 01338 above.

**Stirling Council Response:**

The greater part of this site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (BAL02). For the reasons given it was concluded it was not appropriate to identify the site as an 'option' for consideration in the MIR.

Comments received in response to the MIR consultation are summarised above and generally seek to persuade the Council there are planning considerations of sufficient weight to support the allocation of the site for mixed use development in the Proposed Stirling Local Development Plan (PSLDP).

In response to the MIR consultation and adjoining parcel of land has been identified as a potential housing site to be developed in conjunction with the larger site. This parcel has been the subject of a separate site assessment which can be found in the appendix to the report to the Council meeting on 30 June 2016.

In response to these comments:

Spatial Strategy and Housing Land Requirement

At c. 7.0 ha these conjoined greenfield sites are being promoted for mixed use development that includes residential development with a potential for 100 housing units.

The MIR states the underlying aims of the Spatial Strategy, as set out in the current adopted SLDP, were not being altered in the PSLDP. Having taken full account of all comments submitted in response to the MIR consultation the Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development. In particular the housing land requirement set out in the LDP fully complies with the policy principle set out in Scottish Planning Policy to identify a generous supply of housing land across all tenures, maintaining at least a 5-year supply of effective housing land at all times. Taking account of the identified housing allocation H086 – Kiltrochan there therefore is currently no demonstrable need for the PSLDP to allocate any additional housing land in Balfron.

The Council is also of the opinion that, recognising Balfron by and large functions as a commuter village, sufficient land is also allocated for employment based development.

Other considerations

As noted in the site assessment, it remains the case this scale of housing development raises significant implications for local social infrastructure such as schools and health care. Notwithstanding commentary in the supporting submission there remains significant concerns over potential adverse impacts of site development on the landscape setting/northern gateway of the village and the Balfron North Conservation Area. Potential arrangements for safe and convenient all ability access to village services and public transport links also remains in doubt.

The main cause of the site's unkempt appearance can be attributed to lack of meaningful agricultural activity and land management, e.g. maintenance of boundary hedges, circumstances that could easily be reversed.

<b>Ref.</b>	45	<b>MILSEYBANK, BRIDGE OF ALLAN (BOA01)</b>
<b>Representations by:</b>		
01396 – Westpoint Homes SLDP_101 – Gillian Allison	01039 – Cycle Stirling	
	<b>Total No.</b>	3
<b>Summary of Comments:</b>		
<p>SLDP_101 (Gillian Allison) agrees with the Council's view that the site should not be an option for inclusion in the LDP. It is in the green belt, is prominent and is an important walking route.</p> <p>01039 (Cycle Stirling) states that this site is on the very important cycle commuting route and hotspot (recorded deaths and incidents) between Dunblane and Stirling previously NCN 765 awaiting a cycle route. This should be mentioned and identified as a priority for developer contributions.</p> <p>01396 (Westpoint Homes) are in control of this site and are promoting it for development. They propose to build up to 40 homes including 33% affordable homes and has been designed to respect its setting adjacent to the green belt whilst also being well connected to the settlement. The site will be visually contained by tree belts and Lecropt Manse to the east. A new tree belt is proposed adjacent to the existing trees to the southern boundary further screening the development from view.</p> <p>Access to the site is proposed form the A9 through the formation of a new priority junction. Alternatively, an access may be achieved via the existing access lane to Lecropt Manse. An area of open space provides an attractive setting for Lecropt Manse, maintaining its open aspect to the south. The proposal will be designed in line with Designing Streets. The site is within easy walking distance of public transport, local amenities and services.</p> <p>Westpoint Homes does not agree with the Council's Assessment of the site as contained within the MIR. With regard to the green belt issues, Westpoint are of the view that this site could be removed from the green belt at no overall detriment to the area as the site is bounded by a maturing tree belt along its western edge. Development would therefore not impact upon the setting or identity of Bridge of Allan and Stirling.</p> <p>With regard to the presence of core paths and other footpaths, these would be retained and improved as part of the development. In terms of Biodiversity, there is potential for enhancement of the site which further studies will be able to demonstrate.</p>		

The Council points out that the site is adjacent to two listed buildings. Westpoint Homes has taken these into account and is of the view that their setting would be unaffected by the development of this site. This also applies to the Lecropt Church on the southern side of the A9.

In terms of landscape impact, the Council pointed out that this site is in a highly prominent and sensitive location within the Keir Local Landscape Area (LLA). Westpoint Homes argue that the site is located on the edge of the LLA and occupies less than 0.4% of its area. This development does not infill the open rural landscape between Bridge of Allan and Dunblane. A maturing tree belt along the western boundary of the site and an existing tree belt combined with the woodland to the south along the A9 creates a strong edge between Bridge of Allan and the Lecropt Kirk, retaining and enhancing the visual relationship with this open area and the landscape to the south.

The existing tree belt and the woodland to the south of the A9 will in time signify the arrival at Bridge of Allan beyond the space between Bridge of Allan and Lecropt Kirk.

There is agreement between the Council and Westpoint Homes that the site is well located for public transport links and has good accessibility to local services and facilities. However, the Council states that the location of the site separate to the settlement means it would not integrate well with the existing community.

Westpoint Homes notes that sites have not been assessed individually against all SEA criteria and that this work will require to be carried out for the Proposed Plan.

**School pupils**

Overall, 2 would not support development on this site, 1 unsure and 4 would support development on this site.

**Drop in Sessions**

- 2 – Would not support development on this site
- 0 – Unsure
- 0 – Would support development on this site

**Stirling Council Response:**

This site, currently in the greenbelt, was promoted through the call for sites process but was not identified as an option for residential development in the MIR.

Comments received stating its unsuitability are noted as are the point raised by Cycle Stirling regarding the request that developer contributions be directed towards improving the adjacent cycle commuting route.

The site is being promoted by Westpoint Homes who disagree with the Council's site assessment as set out in the MIR. They are of the view that instead of the railway being a defensible boundary to the western edge of Bridge of Allan, there is a mature tree belt further west which could serve this purpose. The Council disagrees and maintains its view that the rail line forms an effective and easily identifiable defensible boundary to the town and development beyond this would be inappropriate as it would not form a natural extension to Bridge of Allan. Whilst it is accepted that the site has good public transport links, the impact on nearby listed buildings and their setting also remains of concern particularly that of the Lecropt Church when viewed from main road and rail routes.

The Council has also identified sufficient housing land on alternative sites meaning that in terms of housing land supply, there is no need to identify this site for residential development in the proposed plan.

This site is not identified for residential development in the proposed plan.

<b>Ref.</b>	46	<b>SUNNYLAW FARM, BRIDGE OF ALLAN (BOA02)</b>
<b>Representations by:</b>		
SLDP_1012 – Gillian Allison	00654 – Elizabeth Huntly	
	<b>Total No.</b>	2
<b>Summary of Comments:</b>		
<p>Gillian Allison (SLDP_1012) agrees with the Council's decision not to identify the site as an Additional Housing Allocation Option, noting the site is in the countryside, with fantastic views, remote and would cause increased use of cars.</p> <p>Elizabeth Huntly (00654) raised issues with the capacity of the road to the site; water run-off and stated development would lead to the loss of the 'green backcloth' to Bridge of Allan.</p> <p><b>Schools</b> At an engagement session held with year 4/5 pupils at Wallace High School on 8<sup>th</sup> October, 6 pupils did not support development of this site and 3 did not know or had no view.</p> <p><b>Drop-In Sessions</b> 3 - Do not support development on the site 0 - Unsure 1 - Support development on the site</p>		
<b>Stirling Council Response:</b>		
<p>This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.</p> <p>The assessment of the site set out in the MIR remains valid and responses received to the MIR and summarised above support the non-allocation of the site. The Council is of the view that this is not a suitable site to be allocated for housing development as development would be poorly connected to Bridge of Allan, appear prominently within the landscape and due to surface water flooding issues. Development would also have a significant impact on the setting of a scheduled monument.</p> <p>The site is not identified as a housing site in the proposed plan and is retained as Green Belt.</p>		

<b>Ref.</b>	47	<b>POLMAISE ROAD, CAMBUSBARRON (CAM01)</b>
<b>Comments by:</b>		
SLDP_78 – Cambusbarron Community Council	01179 – Hallam Land and Commercial Estates Group	
SLDP_1012 – Gillian Allison	<b>Total No.</b>	3
<b>Summary of Comments:</b>		

Cambusbarron Community Council (SLDP\_78) object to the development of the site, raising issues relating to the setting and character of Cambusbarron; the site's historical significance; landscape; biodiversity; flooding and road safety. The arguments presented are summarised as follows:

#### Setting/Character

Development of the scale proposed would represent a very significant extension to Cambusbarron and destroy the village's 'sense of place', whereby it would cease to exist as a distinct community and instead be subsumed as a suburb of Stirling. In this regard the site acts as a definite marker of Cambusbarron's status as a distinctive village, separate from Torbrex or St Ninians, particularly in the context of recent development nearby.

#### Historical significance

This area is part of the historic Gillies Hill. It is argued that this field was the likely path of the ghillies in 1314 on their way to the Field of Bannockburn.

#### Landscape

Visually, from a distance (the King's Park, for example), the green sward of this field offsets the quite different green and texture of the wooded land above, serving to act as a dramatic foil to the landscape.

#### Biodiversity

The site is a visible green refuge for wildlife, some of it rare, with red kite, deer, badgers, buzzards and red squirrel all observed in this area.

#### Flooding

Surface water drainage from this proposed development would have to be disposed of via the Raploch Burn which is already prone to flooding in the Mill Road area of the village. The foul sewage from the original village is disposed of through a combined sewerage system, on which emergency storm water overflows discharge to the Raploch Burn at high flows. The flow in the pipe along the banks of the Raploch Burn will be substantially increased with the addition of 220 houses and will tend to overflow more frequently. Sewage contamination of the Burn will therefore be much more likely.

#### Road safety concerns

Increased numbers of road users created by the proposed development would exacerbate danger to school children using St Ninians Road to get to school at either Cambusbarron Primary, St Ninians Primary or Stirling High. The width and underfoot conditions of the single pavement along St. Ninians Road are at present inadequate.

Gillian Allison (SLDP\_1012) agrees with the Council's assessment of the site, referring to its historical and cultural value and its location in the countryside.

Hallam Land and Commercial Estates Group (01179) have submitted detailed information addressing a range of issues in support of the development of the site, which is also subject to a current Planning Permission in Principle application (14/00783/PPP).

The submission in particular addresses the site assessment set out in the MIR which concluded the impact of the scale of development proposed on the setting of Cambusbarron and its visual relationship with Stirling is a key concern and that challenges at Cambusbarron Primary School to support this scale of development remain unresolved, meaning the site as proposed cannot be made effective. Hallam Land and Commercial Estates Group argue this assessment is not sufficiently comprehensive to have reached

the conclusion that the site is not effective and that the site can make a marked contribution towards the Plan's Housing Supply Target.

Landscape

A Landscape and Visual Appraisal (2014) and Addendum Report (2015) conclude that the scale of development proposed is justified by the site's capacity to accommodate development; that the site lies relatively discreetly within the wider landscape, with visibility restricted by a combination of landform, woodlands, tree cover and built form, such that it is largely confined to within the localised area, with no impact in landscape terms on Stirling.

Furthermore, reference is made to the LDP examination report wherein the Reporter was satisfied any built development on the site would have no material impact on the visual or landscape character of this part of the Local Landscape Area.

Education

The developers maintain a solution to the issue of school capacity is possible and, in discussion with the Council and as part of the planning application process, have prepared proposals for an extension to Cambusbarron Primary School which take into account the Council's specifications for primary schools and seek to address the capacity issues that would arise from the development of the Polmaise Road site.

**Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.

Subsequent to the publication of the MIR, in March 2016, Planning Permission in Principle for residential and associated development was refused by Stirling Council.

The assessment of the site set out in the MIR remains valid and the responses received to the MIR and summarised above, including from the Community Council support the non-allocation of the site. The Council remains of the view that this is not a suitable site for housing development due to the lack of primary school capacity, to which it is not considered a solution can be found in the short to medium term, and the impact the scale of development proposed would have on the setting of Cambusbarron and its visual relationship with Stirling.

It is recommended not to allocate the site for housing in the Proposed Stirling Local Development Plan.

<b>Ref.</b>	48	<b>ST. MARGARETS, COWIE (COW01)</b>	
<b>Representations by:</b>			
SLDP_126 - Scottish Water 01039 - Cycle Stirling		01426 - Derek Byrne	
		<b>Total No.</b>	3
<b>Summary of Comments:</b>			
SLDP_126 - Scottish Water			

Adequate water supply, possible further investigation required on local network. Developer should contact Scottish Water as early as possible. Small waste water pipe crossing mid-section of site.

**01039 - Cycle Stirling**

NCN 76 'Round the Forth' passes through Cowie via some busy roads and through a muddy field which needs upgrading for local users and potential cycle tourers. Link paths should be improved to connect Cowie to neighbouring Plean and Fallin.

**01426 - Derek Byrne**

Height, design and type of housing to complement existing, e.g. mixture of bungalows and, potentially, self-build plots. The setting back of building could open up the area and green space and planting would soften development.

Bannockburn Road is a busy road and access should not hinder existing residents' access. Adequate on-site parking should be provided to prevent Bannockburn Road being used. During development efforts need to be made to reduce noise, heavy vehicles, dirt and employee parking. Residents at 5-11 Bannockburn Road may benefit from a new access to reduce parking on Bannockburn Road. A re-located roundabout and bus stop and further speed measures should be considered, along with the undergrounding of power lines and adequate lighting to discourage crime.

Cowie has problems with fire raising and there are concerns as to how long the school will lie vacant.

**Stirling Council Response:**

This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (Ref: COW01). The site was deemed consistent with the Plan's Vision and Spatial Strategy and, taking account of the findings of the other assessment criteria, it was concluded the site should be promoted for c. 15 housing units and therefore was included in the MIR's Table 6 - Additional Housing Allocation Options 1, 2 and 3.

The comments of Scottish Water have been noted. With reference to the comments of Cycle Stirling whilst there is merit in the concerns raised it is not appropriate to seek off-site improvements to local active travel routes on the basis of this small scale development. The points made by Mr. Byrne, particularly where they relate to site planning and design are, where practicable, addressed in the key site requirements.

Having taken full account of all comments submitted in response to the MIR consultation it is therefore concluded it is appropriate to identify the option as a formal housing allocation in the PSLDP, subject to a range of appropriate key site requirements.

<b>Ref.</b>	49	<b>LOCHILLS, DEANSTON (DEA02)</b>
<b>Representations by:</b>		
SLDP_272 – Stewart Milne Homes Ltd.	01039 – Cycle Stirling	
SLDP_1012 – Gillian Allison	<b>Total No.</b>	3
<b>Summary of Comments:</b>		
SLDP_272 – Stewart Milne Homes Ltd. refute the suggestion that the site south of the B8032 at Lochills is an inappropriate location for housing; consider the Site Assessment		

contained within the Main Issues Report ignores much of their submission at the 'Call for Sites' stage and perpetuates the previous inaccurate suggestions that there are constraints to development.

The arguments forwards by Stewart Milne Homes Ltd. are:

- Conservation Area designation and the presence of a listed building/ancient monument does not preclude new development;
- The Council's concerns regarding matters of detail (e.g. traffic generation, pedestrian safety, drainage capacity, visual impact) should all be capable of resolution.
- A housing allocation would be, along with DEA01, 'enabling development' as it would deliver the proper management and maintenance of the retained parkland, leading to enhancement of the conservation area and both the setting of the listed building and scheduled monument. The deteriorating parkland currently detracts from the setting of the listed building and conservation area;
- It is disingenuous of the Council to suggest that there is a risk of flooding, distance to the River Teith and difference in levels means there is no measurable risk;
- There are no capacity constraints in relation to waste water treatment and Scottish Water remain committed to working with developers to address any specific upgrading work that might be required;
- The site is not open in character, with woodland planting and built development on almost all sides. It is visually well-contained on all main approaches to Deanston and Doune. The only exception is on the south boundary at Lochills but even there the backcloth of surrounding woodland minimises the use of the site and the potential visual impact of any development;
- It is disingenuous of the council to suggest that the site is rural in character. The site is contained by built development (residential and commercial) on most boundaries. For this very reason there is no risk of development appearing in any way incongruous.
- Nothing of landscape value would be lost through development as proposed. Development would be remarkably well contained with limited views from most approaches and surrounding woodland providing an effective backcloth where development can be seen from the surrounding area;
- For the reasons already set out there are no grounds whatsoever for the suggestion that development on the site would have any detrimental effect on the setting of the conservation area, Deanston House, the Scheduled Monument or Teith Bridge. The setting of the burial cairn in the northwest corner of the site has been addressed in detail in previous submissions and the latest proposals have increased the setback from the scheduled monument in response to previous council concerns regarding its setting;
- The site is surrounded by built development which includes a petrol filling station containing a convenience shop within walking distance of the proposed development.
- Existing bus stops on Deanston Road are within easy walking distance of the proposed development.
- The claim that development would be one kilometre from the nearest community is simply untrue – there are residential properties on most boundaries of the site while houses within the built up areas of Deanston and Doune are both less than one kilometre away.
- Development would provide extensive new provisions for pedestrians and cyclists, where possible remote from the A84 and B8032. Street lighting exists along the

B8032 from the A84 to the west end of Deanston View at its junction with Ashmill Road. Matters such as speed limits and street lighting are precisely the types of detail that the previous Reporter concluded should be capable of resolution.

- Issues such as speed limits and street lighting are capable of resolution. The junction with the trunk road network could be improved by the installation of traffic lights and tidal movements across the Teith Bridge. This would allow an increase in the width of the footway across the bridge, creating a direct, safe pedestrian link between the site and Doune as well as Deanston;
- The council's Transport Summary is not supported by objective, technical analysis. There is no reason why development would be any more reliant on trips by private cars than the recent new housing development at Leny Road;
- The most recent, available data on the school capacity/roll indicates that, despite suggestions to the contrary, there will be capacity to accommodate further housing as proposed;
- The development will help to consolidate the dispersed edge of Deanston providing permeability and direct linkages between the Lochills, Ashmill and Deanston View areas and the centre of the village

Gillian Allison (SLDP\_1012) agrees with the Council's decision not to identify the site as an Additional Housing Allocation Option, noting it is in the countryside, isolated from Doune and there are road safety implications.

Cycle Stirling (01039) state there is an opportunity to provide a cycle path along the A84 between Teith Bridge and Kirk Lane where cyclists can cycle along the quieter roads to Stirling, Thornhill and Kippen, the B8032 being the preferred cycling route to Callendar and the Trossachs.

**Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.

The assessment of the site set out in the MIR remains largely valid and one response received to the MIR and summarised above supports the non-allocation of the site. The Council is of the view that this is not a suitable site to be allocated for housing development as it is not within or adjoining an existing settlement and is clearly visually separate from Deanston and Doune. Despite surrounding land uses, the site is rural in character and a large-scale housing development, as proposed, would appear incongruous.

Development of the site would be contrary to the spatial strategy set out in the proposed plan for the Rural Villages Area, which envisages small-scale expansion of existing settlements consistent with their size.

The site is not identified as a housing site in the proposed plan.

<b>Ref.</b>	50	<b>EAST OF DOUNE RIGGS, DOUNE (DEA04)</b>	
<b>Representations by:</b>			
SLDP_27 – Moray Estates		01039 – Cycle Stirling	
SLDP_1012 – Gillian Allison		<b>Total No.</b>	3

**Summary of Comments:**

Development of the site for housing is promoted by Moray Estates (SLDP\_27), in the period beyond 2022.

Moray Estates state that the social and economic development of Doune and the rural area could be assisted through the identification land for additional housing and associated development to support this area's growth and meet an acute need for both affordable and market housing.

It is noted that at the LDP Examination, the Reporter made a number of conclusions in relation to the potential development this site, offering qualified support, with additional information on potential impact on the wider landscape from a visual perspective considered necessary before an allocation could be made. In response to the Reporter's comments, a Landscape and Visual Impact Assessment (LVIA) of the site was subsequently undertaken and submitted as part of the Call for Sites process in December 2014, albeit not taken into account in the published Main Issues Report due to an oversight on the part of the Council.

It is argued:

- With careful design, the proposed site could be developed without having a significantly greater impact on the landscape setting of Doune and comprehensive landscaping to the eastern boundary of the site would substantially reduce the visibility of any housing from the northeast;
- All development would be implemented under the direction of a detailed design code, which would ensure that the buildings are appropriate to the rural character of the surrounding landscape in height, density and form;
- The proposal would allow for the establishment of a strong, structural landscape boundary to the eastern side of the village which would be reflective of the pattern of woodland enclosure found in the surrounding area;
- variations in population profile and migration mean that estimations of capacity at Doune Primary School post-2020 cannot be exact and as a result, the forecast capacity of the school should not be considered as a constraint on future residential development in Doune from 2020 onwards;
- limited capacity at the Waste Water Treatment Works in Doune should similarly not be seen as a barrier to growth or development as if development meets Scottish Water's criteria in respect of sustainability and viability, a growth project would be implemented to accommodate the new development.

Moray Estates conclude the site to the east of Station Wynd is the next logical step in the long term sustainable development of the village of Doune, providing a natural extension to the village and establishing a coherent boundary within the existing urban envelope.

Gillian Allison (SLDP\_1012) agrees with the Council's decision not to identify the site as an Additional Housing Allocation Option, noting the site is in the countryside and the presence of the former railway line which now forms a core path.

Cycle Stirling (01039) advise that cycle links to Callendar should be improved by extending the NCN 765. This would provide a vital cycling and active travel route from rural Stirling and Loch Lomond and the Trossachs National Park into Stirling, enhancing community links and tourism potential.

**Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the

reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.

The assessment of the site set out in the MIR remains largely valid; it is accepted that waste water capacity should not be seen as a barrier to development – if Scottish Water’s criteria in respect of sustainability and viability are met, a growth project would be implemented to accommodate the new development. Furthermore, an appraisal of impacts on the landscape and visual amenity was submitted at the Call for Sites stage. This concluded that the development would have no significant effect on the landscape character and setting of the town but that more detailed and localised townscape assessments would be needed once detailed proposals come forward.

The Council, however, remains of the view that this is not a suitable site to be allocated for housing development at this time. Development of the site would be contrary to the spatial strategy set out in the adopted and proposed plan for the Rural Villages Area, which envisages small-scale sustainable expansion of existing settlements consistent with their size. The adopted plan allocated land for approximately 150 new homes at Station Road, the majority of which have been built and are occupied. Further development of Doune is not supported in terms of primary school capacity.

The site is not identified as a housing site in the proposed plan.

<b>Ref.</b>	51	<b>DUCKBURN, DUNBLANE (DUN05)</b>	
<b>Representations by:</b>			
SLDP_132 – Forestry Commission		01420 – D. Greenhill	
SLDP_1012 – Gillian Allison		<b>Total No.</b>	3
<b>Summary of Comments:</b>			
Forestry Commission (SLDP_132) do not support development of this site as it goes against Scottish Government policy on woodland removal.			
Gillian Allison (SLDP_1012) agrees with the Council’s view that the site should not be an option for inclusion in the LDP, noting it is highly scenic, forms the boundary of Dunblane and part of the setting of the town and cathedral and its approach.			
D. Greenhill (01420) also refers to the site forming part of the landscape approach to Dunblane and views to the Cathedral in expressing opposition to the development of the site.			
<b>Schools</b>			
Fourth and fifth year pupils from Dunblane High School considered the site at an engagement session held on 23 <sup>rd</sup> October. Overall, 3 pupils did not support development of this site, 1 did not know or had no view, while 4 pupils did support development.			
<b>Drop-in Sessions</b>			
2 - Do not support development on the site			
0 - Unsure			
0 - Support development on the site			
<b>Stirling Council Response:</b>			
This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the			

reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.

The assessment of the site set out in the MIR remains valid and the responses received to the MIR and summarised above support the non-allocation of the site. The Council is of the view that this is not a suitable site to be allocated for housing development due to its prominence in approaches to the town; the impact development would have on the setting of Dunblane and on the character of the Kippenross Designed Landscape.

The site is not identified as a housing site in the proposed plan.

<b>Ref.</b>	52	<b>BEECH PARK, DUNBLANE (DUN06)</b>	
<b>Representations by:</b>			
SLDP_132 – Forestry Commission		SLDP_1275 – S. Profili	
SLDP_1012 – Gillian Allison		<b>Total No.</b>	3
<b>Summary of Comments:</b>			
<p>The Forestry Commission (SLDP_132) note that the site is subject to a conditional felling licence which require that land to be replanted with trees. Do not consider the site should identified as a housing opportunity.</p> <p>Gillian Allison (SLDP_1012) agrees the site should not be an additional housing allocation option, referring green belt, the historic Darn Road path and access issues.</p> <p>S. Profili (SLDP_1275) noted the sensitive development of the site could improve the access into Dunblane.</p> <p><b>Schools</b> At an engagement session held with year 4/5 pupils at Dunblane High School on 23<sup>rd</sup> November, 6 pupils did not support development of this site and 5 did not know or had no view, while 2 pupils supported development.</p> <p><b>Drop-In Sessions</b> 4 - Do not support development on the site 2 - Unsure 0 - Support development on the site</p>			
<b>Stirling Council Response:</b>			
<p>This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.</p> <p>The assessment of the site set out in the MIR remains valid and responses received to the MIR and summarised above support the non-allocation of the site. While representing a sustainable location near to the town centre, the Council is of the view that this is not a suitable site to be allocated for housing development. The site is highly prominent and within the Green Belt and Kippenross Designed Landscape. The incursion of development into this area would be detrimental to the character and identity of Dunblane and its setting.</p>			

The site is not identified as a housing site in the proposed plan and is retained within the Green Belt.

<b>Ref.</b>	53	<b>DUNBLANE – GENERAL COMMENTS</b>	
<b>Representations by:</b>			
SLDP_987 – K.R. Walker		01692 – Ellen Pennie	
01455 – Hillary Evans		01693 – Holly MacLean	
01519 – Elsie Wallace		01694 – Emma Fitzsimmons	
01681 – Niamh Proctor		01695 – Sophie Gilchrist	
01682 – Fergus Maclachlan		<b>Total No.</b>	9
<b>Summary of Comments:</b>			
<p>NB: a number of representation were made referring in general terms to new development in Dunblane. These are summarised here:</p> <p>K.R. Walker (SLDP_987) and Elsie Wallace (01519) expressed concern at overdevelopment in Dunblane, stating the local services/amenities are already having trouble coping.</p> <p>Hillary Evans (01455) is not in support of more and more houses being built in large development, particularly where it would result in the loss of countryside, fields and woods. States Dunblane’s services are already under considerable pressure, especially the sewerage system and high school where several years are full to capacity.</p> <p>Niamh Proctor (01681), Fergus Maclachlan (01682), Ellen Pennie (01692), Holly MacLean (01693), Emma Fitzsimmons (01694) and Sophie Gilchrist (01695) expressed objections (some strongly) and concerns over new housing in and around Dunblane highlighting impact of development on the local community; habitat loss and impact on wildlife; loss of open space/countryside for recreation and impact on quality of life.</p>			
<b>Stirling Council Response:</b>			
<p>The Proposed Plan identifies two new development sites in Dunblane. The housing site at Barbush (H138) for 80 units replaces an allocation for retail and employment on the same site and lies within the settlement boundary. The second site is a minor incursion into the green belt and countryside at Hillside (H137 - 15 units). The loss of open space/countryside is therefore limited.</p> <p>It is acknowledged that existing primary school provision in Dunblane is limited, but existing planned development identified in the Housing Land Audit 2015 plus a small amount of additional allocated housing consistent with the Main Issues Report can be accommodated with minor modifications to existing primary schools. The same applies to the High School. The Council will continue to work with developers to scheduling the timing of development and manage admissions, including through placing requests, through further use of reserved spaces to ensure the impact from pupil product of future developments can be minimised.</p> <p>It should be noted that the proposed plan identifies fewer additional housing units in Dunblane (95) than was envisaged in the Main Issues Report (130).</p> <p>With regard to the Water Treatment Works, Scottish Water are undertaking a detailed review to establish the remaining capacity at the Dunblane Water Treatment Works. Notwithstanding the results of this review, if Scottish Water’s criteria in respect of</p>			

sustainability and viability are met, a growth project would be implemented to accommodate the new development.

Overall, it is considered that the services and infrastructure within Dunblane can accommodate new development of the scale proposed by the proposed plan.

<b>Ref.</b>	54	<b>KILLEARN HOSPITAL (KIL05)</b>
<b>Representations by:</b>		
SLDP_89 – Killearn Community Council 00711 – SNP Group		01314 – Brenda Pell
<b>Total No.</b>		3
<b>Summary of Comments:</b>		
<p>SLDP_89 – Killearn Community Council The former Killearn Hospital, derelict for c. 40 years, remains of concern. At a recent meeting we were advised that consultants were now assessing the costs of contamination removal and site restoration. We hope that such neutral assessment will lead to serious discussion with the Community Council in developing a Planning Brief for the site.</p> <p>00711 – SNP Group We are heartened that our preferred option to build on Killearn Hospital (KIL05) is included and would seek that priority is given to the development of housing and employment, over other local rural locations.</p> <p>01314 – Brenda Pell Killearn Hospital has development potential but been virtually dismissed. It ranked highly in responses to a recent local survey as an area that required remediation and restoration. It is an eyesore and an insult to the village. We are now in the fifth decade of neglect and residents have been campaigning for decades against the lack of action to bring this land back to some sort of purposeful use. The problem of contamination is recognised but has not been thoroughly investigated - or if it has the results have not been made public. If the owner cannot meet the financial burden of remediation then it is surely the responsibility of Stirling Council to find ways to assist in this matter? The Local Development Plan should be the means by which notice is taken of public opinion and a lead is given in tackling this problem area. Some positive action is needed.</p>		
<b>Stirling Council Response:</b>		
<p>The SLDP allocates the former Killearn Hospital, extending to c.11.0 ha, for employment use, with 2.5 ha included in the business land supply (B47). The remainder of the site maybe suitable for residential, tourism and leisure development. Residential development is permitted to a scale to enable the implementation of a contaminated land strategy and general site restoration, to be determined by a fully costed and independently audited restoration plan.</p> <p>This site was subject to a detailed site assessment, as set out in the MIR (KIL05). It was concluded that relative remoteness from Killearn services and primary school, and absence of safe walking/cycling routes, would result in a high degree of car dependency, thereby precluding large scale 'enabling' residential development.</p> <p>Since the publication of the MIR the Council and site owner have been exploring potential housing led solutions to address the long running contamination and dereliction issues</p>		

referenced in the above comments. Following from this the PSLDP identifies the site as a location for housing development, Period 2: 2027 onwards, capacity to be confirmed.

<b>Ref.</b>	55	<b>LOWER MILTON, BANNOCKBURN (STR02)</b>
<b>Representations by:</b>		
01606 – Cala Homes SLDP_1012 – Gillian Allison		01039 – Cycle Stirling
<b>Total No.</b>		3
<b>Summary of Comments:</b>		
<p>01606 (Cala Homes) are promoting this site for the development of 35 houses. It is argued that the methodology of calculating the housing land requirement is incorrect and that more land needs to be identified to meet with SPP (see 3. Housing Land for more details).</p> <p>Cala do not agree with the Council’s assessment of the site stating that the designation of Stirling South Gateway site has resulted in the physical severance of land between the A91 and the existing settlement boundary. The impact of an incursion into the greenbelt at this location would therefore be limited. With regard to the Council’s concern over the impact of the development on the views between Cat Craig and the A listed Bannockburn monument, Cala states that development on the higher part of the site would be avoided meaning that longer views across the battlefield and, in particular, views between the monument and Cat Craig would not suffer detriment. Cala is of the view that development of this site would result in improved pedestrian access along Bannock Burn and this, alongside the creation of new open space would assist with the Council’s ‘green gateway to the city concept’. Cala is prepared to provide a closer southbound bus stop and to make education contributions in line with SG15 and is of the view that the site is effective.</p> <p>SLDP_1012 (Gillian Allison) agrees with the Council that this site should not be identified as an option for housing development due to the loss of greenbelt.</p> <p>01039 (Cycle Stirling) state that the site is isolated between the busy A872 and the junctions to the west, the Bannockburn Gorge to the north, and an inadequate core path for cycling, and green space to the south. There is a need for safe cycle links along the main road north to link with Milton Gardens and Newlands Road and Chartershall road to and improved cycle access to Bannockburn linking with Newlands Road and Coal Wynd.</p>		
<b>Stirling Council Response:</b>		
<p>This site has been promoted through the call for sites process but was not identified as an option for residential development in the MIR.</p> <p>The comments received stating it should not be a housing site are noted as are Cycle Stirling’s points regarding the need for safe cycle links in this area.</p> <p>Cala Homes who are promoting the site do not agree with the Council's assessment of the site and provide solutions which, in their view, will mitigate against impacts on the battlefield. However, the Council remains of the view that development of this site would inevitably impact on views across the battlefield, between Cat Craig and the monument and on the green network. It would not form a logical expansion to the urban area as it would be highly visible with no natural boundary to the south. Any landscaping planted as part of the development would take a significant number of years to establish and act effectively as screening. The case that Cala has put forward does not change the</p>		

Council's view that this site has significant value as an open space and is not appropriate for housing development.

The site does not appear as a housing site in the proposed plan.

<b>Ref.</b>	57	<b>GARTCLUSH FARM (STR06)</b>
<b>Representations by:</b>		
SLDP_1139 – John Brisbane & Son	01039 – Cycle Stirling	
SLDP_1012 – Gillian Allison	<b>Total No.</b>	3
<b>Summary of Comments:</b>		
<p><u>Non Allocation of site</u>            John Brisbane &amp; Son (SLDP_1139) do not agree with the site assessment or the options presented in the MIR as they do not include their site as an option. Detailed reasons below. Some comments relate to wider issues of land supply or the effectiveness of Durieshill, these are dealt with under Issues 3 and 60 respectfully. This summary will focus on site specific issues.</p> <p>Gillian Allison (SLDP_1012)            Agrees with the non-allocation of the site in the MIR.</p> <p><u>Site Assessment</u>            John Brisbane &amp; Son (SLDP_1139)            Do not agree with the Council's site assessment process as it continues to rely on significant output from Durieshil and the Eastern Villages. Consider that there is limited market demand for the level of housing proposed in these villages and the programming is optimistic. Consider that there has been no progress in developing Durieshill in 11 years and consider the site to be non-effective and not likely to come forward before 2019/2020. Consider that the spatial strategy of the plan has significantly altered from the adopted LDP as there is now a large number of sites proposed to adjoin the eastern villages. Support the inclusion of South Stirling Gateway and encourage major growth of Stirling along the A91. Consider the A91 as being likely to be supported by housebuilders and will deliver long term strategic growth. It would be appropriate to allocate further land in this area for tourism, commercial, retail and residential use along the Falkirk Road in line with the submitted masterplan.</p> <p><u>Environmental issues</u>            John Brisbane &amp; Son (SLDP_1139)            Disagree with the Council's comments on the site leading to coalescence and that the site would be remote and isolated from Stirling. Stress that the identification of the site would be plan led and be a replacement for lost capacity at Durieshill. State that the masterplan would include land between Gartclush and up to the A91 including the former brownfield site and there would be no risk of coalescence. Consider that this area forms part of the Strategic Growth Area that was supported technically by officers, whilst elected members preferred Durieshill. Note the comments on drainage and flood risk and that this would be assessed at the appropriate time, although they do not consider there will be drainage issues. State that archaeological and biodiversity studies required will be carried out and mitigation measures put in place as required. Consider that there are similar issues to those that are holding Durieshill back but that these are on a much smaller scale and that the site is better placed to deliver sustainable linkages to Stirling and should be preferred.</p> <p><u>Masterplan</u></p>		

John Brisbane & Son (SLDP\_1139)

Submit a mastepan showing that the site would be developed in 3 phases. Consider that site A indicated on the masterplan as being to the south east of the former Bannockburn Hospital and would be capable of delivering 300 units within the first 5 years of the plan and a further 300 units in years 5 to 10. Submit that the site is effective and meets the tests of effectiveness as set out in PAN 2/2010.

Transport and Access

John Brisbane & Son (SLDP\_1139)

In respect of transportation a full Transport Impact Assessment would be carried out.

Cycle Stirling (01039)

Consider that identification of the site is an opportunity to increase pedestrian and cycle links in the area and provide a new bridge to cross the nearby motorway junctions and create attractive green travel routes away from the busy roads. Consider that this would encourage local residents to cycle to nearby destinations and attract tourists using the nearby NCN 754.

**Stirling Council Response:**

The output identified in the Proposed Plan from Durieshill and the Eastern Villages is considered achievable. The programming identified is based on the 2015 Housing Land Audit which was fully agreed with Homes for Scotland. The Vision and Spatial Strategy for the Proposed Plan does not differ from the adopted 2014 LDP, with all sites being carried over or having phasing amended. One small site of 15 units has been added at the former St Margarets Primary in Cowie and the Council would refute that this is considered to be a significant inclusion.

With reference to the assertion that major growth should be encouraged along the A91, on the basis that this would likely be an area supported by housebuilders and deliver long term strategic growth, this is not supported. Strategic allocations are already identified in this area at South Stirling Gateway and further south at Durieshill. These allocations are yet to deliver but the Draft Action Programme sets out the steps the Council will take to ensure the delivery of these allocations. Further identification of large scale sites in this area is not considered appropriate at this time. In terms of placemaking, the site assessment notes that development of this site would appear as an isolated large housing estate within the Countryside. The A91 at this point forms a strong boundary of the urban Stirling area and a significant urban expansion in this regard would be a significant departure from the LDP's Vision and Spatial Strategy.

The applicants also note that the site would be deliverable and capable of delivering 300 units within the first phase of the plan, and that this would replace lost capacity at Durieshill. While programming at Durieshill has been pushed back and therefore delivering less than anticipated across the plan period, the Council still feels it is appropriate to continue to identify the site for development as discussions with a national housebuilder progresses. The proposed plan identifies enough land in line with SPP to meet the housing supply target, and additional generosity, and can demonstrate a 5 year supply of effective land at adoption.

For the reasons outlined above it is not considered appropriate to identify the site for development at this time. It would be contrary to the current Spatial Strategy and would not meet any demonstrated shortfall in effective housing land supply.

<b>Ref.</b>	57	<b>BROADLEYS FARM (STR10)</b>	
<b>Representations by:</b>			
SLDP_151 – Network Rail		01039 – Cycle Stirling	
SLDP_263 – Taylor Wimpey Plc		<b>Total No.</b>	3
<b>Summary of Comments:</b>			
<p><u>Site location</u> Taylor Wimpey Plc (SLDP_263) The site is being promoted for approx. 200 units by the applicant and was not identified in the MIR as an option for housing. Consider the site to be a natural extension to Stirling as the wider Springkerse area has seen extensive development over the last 10 years. The site is bounded to the west by a railway, the east by the A91 and to the north by proposed and existing retail and business development. The site amounts to approx. 102 acres and is presently used as pasture land and contains a coal bing.</p> <p><u>Non allocation of the site</u> Taylor Wimpey Plc (SLDP_263) Do not agree with the non-allocation of the site in the MIR. Consider that the Council are not maintaining a 5 year supply of housing land as per SPP 2014 requirements and submit that their site can contribute to the identified shortfall and be deliverable in a 5 year timescale. Consider that the site meets all the tests of effectiveness as identified in PAN 2/2010. The site is effective and there is no constraint identified by the MIR site assessment that cannot be overcome by the sensitive design and layout of the proposal.</p> <p><u>Transport and Access</u> Network Rail (SLDP_151) Note that this site is not identified as an option in the MIR but state that should the site be preferred for development in the future they would have concerns over the impact on the St Ninians pedestrian crossing. They have an aspiration to replace this crossing with an overbridge due to current safety concerns.</p> <p>Cycle Stirling (01039) Consider that cycling links are not poor and that they are good via the NCN 76 to Springkerse and Fallin, via Millhall Road to Braehead and under Thunder bridge to Bannockburn. Consider that there is further opportunity for an off road cycle route along the A91.</p> <p>Taylor Wimpey (SLDP_263) The attached masterplan for the site shows that vehicular access to the site will be from the A91 roundabout to the north of the site and additionally from a new access to the south off of the A91. The site is located close to existing public transport routes and a new pedestrian link with Millhall Road will increase connectivity to bus stops in Braehead. This new link could be used by cyclists and links to the nearby NCN 76 could also be provided. Consider the present at grade crossing is a barrier to safe movement and would be willing to contribute to provision of a suitable footbridge to replace this.</p> <p><u>Greenbelt/Green Network</u> Taylor Wimpey Plc (SLDP_263) Consider that the site does not play a significant role in the wider green belt designation as the site is visually related to the wider urban area being bounded by the existing road network. Consider that the site should be removed from the green belt.</p> <p><u>Placemaking</u></p>			

Do not agree with the placemaking comments in the MIR and contend that it should be recognised that the site is visually connected to wider development to the north and the A91 provides a clear and robust boundary to limit further development pressure. Consider that links to the surrounding retail and residential areas allows good movement between the site and the wider urban area.

#### Landscape Impact

Taylor Wimpey Plc (SLDP\_263)

Reference a 2012 Landscape Appraisal that concluded that the site is generally enclosed with minimal visibility from the adjacent rural areas and filtered and limited visibility from the A91. Views to the Ochil Hills and Wallace Monument are generally open and expansive in nature. Consider that a well-designed development of high quality housing, and appropriate landscape mitigation would be appropriate in this location due to the current containment provided by woodland. Consider that there is no grounds to deny the allocation of the site on the impacts on greenbelt or wider landscape setting.

#### Historic Environment

Taylor Wimpey Plc (SLDP\_263)

Recognise that the site forms part of the wider inventory Battlefield allocation relating to the Battle of Bannockburn. Consider that the evidence to support the Council's view that the site is potentially the site of day 2 of the battle is disputed and cannot be confirmed. Consider that there have been no palaeoenvironmental work carried out on the site and despite a number of archaeological investigations very little has been found to support current theories about the battle on the 24<sup>th</sup> June. Recognise some material has been found but it is not enough to support the argument that the battle was fought on the carse. State that it is possible that the site formed a secondary or peripheral role in the battle. Recognise that the importance of the Battle of Bannockburn and that the proposed site sites within the wider battlefield area, this is not enough to preclude development on the site. Mitigation measures can be applied to ensure there is minimal impact on the wider battlefield area, with proposed improvements where possible could be made to the Bannockburn Heritage Trail that runs in part across the site.

#### Biodiversity

Note the comments made in the site assessment regarding that the site could have a negative impact on the wildlife and habitat on site. Propose that an ecological survey will be undertaken to mitigate any impact.

#### Social and Economic Impact

Taylor Wimpey Plc (SLDP\_263)

Consider that the site benefits from close proximity to local commercial and retail centres at Springkerse and that the site is well linked to the wider services in Stirling and Bannockburn. Note that the site is within the catchment of Braehead Primary and Stirling High School's.

#### **Stirling Council Response:**

Taylor Wimpey Plc (SLDP\_263) contend that the site would be able to contribute to an identified shortfall in housing land and be deliverable within 5 years as there are no constraints. They also contend that there is no constraint that could not be overcome by a sensitive design and layout. The Council does not agree with this assessment.

It is acknowledged that the Council does have a shortage in housing supply and is not compliant with current national planning policy, SPP 2014, with reference to the 2015 Housing Land Audit. The MIR identified 3 options that the Council could take to demonstrate the required level of supply. This site did not form part of any of the 3

options. The Proposed Plan allocates a sufficient Housing Land Requirement and the Council can demonstrate a 5 year effective land supply at adoption.

The site assessment concludes that the site would appear detached from the urban area due to its separation from Braehead by the railway line. It would also be physically detached in this regard and also from the commercial Broadleys/Springkerse industrial areas to the north.

As noted by the site assessment and the applicants, the site is part of the Green Belt and is considered to fall under the wider Battle of Bannockburn battlefield area. Comments from the Council's archaeologist indicate that the site is widely considered to be the likely location of day 2 of the battle. Concerns have been expressed that development in this area has the potential to destroy objects of interest and would adversely impact on the open nature of the site.

The scale of the proposed development on the site would also place significant pressure on Braehead Primary and Bannockburn High School. Capacity would unlikely not be unlocked until the new schools/extensions and the catchment review are complete, delaying development of the site.

Conclusion

Contrary the comments from Taylor Wimpey, the Council does not see merit in identifying this site for development at this time. As shown above, and in the MIR site assessment, there are significant concerns regarding the developments impact on placemaking, the Green Belt and the impact on a designated battlefield. Additionally, the Council is of the opinion that the proposals in the Proposed Plan demonstrate compliance with SPP 2014 and that there is no need for this site to contribute to an identified shortfall in supply. Even if there was a shortfall, this site would unlikely be able to address this within the 5 year period under consideration due the aforementioned education capacity constraints.

<b>Ref.</b>	58	<b>SOUTH OF MILNDAVIE ROAD, STRATHBLANE (SBL07)</b>	
<b>Representations by:</b>			
SLDP_102 – Strathblane Community Council		01477 – Blair Armstrong	
SLDP 1319 - Willie Oswald		<b>Total No.</b>	3
<b>Summary of Comments:</b>			
SLDP_102 – Strathblane Community Council support the rejection of this site for the reasons given in the site assessment.			
SLDP 1319 – Willie Oswald agrees totally with the suggestion that the site should not be developed.			
01477 – Blair Armstrong considers sites within the green belt should be instantly excluded.			
<b>Drop in Sessions</b>			
16 – Would not support development on this site			
0 – Unsure			
2 – Support development on this site			
<b>Stirling Council Response:</b>			

This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (SBL07). For the reasons given it was concluded it was not appropriate to identify the site as an 'option' for consideration in the MIR

These comments support the conclusion of the MIR that the site should not be identified as a housing option and are further addressed by the recommendation not to allocate the site for housing in the PSLDP.

<b>Ref.</b>	59	<b>SOUTH STIRLING GATEWAY</b>	
<b>Representations by:</b>			
SLDP_193 –TACTRAN SLDP_715 – The Tough Family		SLDP_724 –Tulloch Homes 01567 – Cala Homes & Muirhead Family	
		<b>Total No.</b>	4
<b>Summary of Comments:</b>			
<p><u>1. Support for allocation of H055</u> SLDP_715 The Tough Family support the MIR in reaffirming South Stirling Gateway as a strategic expansion allocated within the LDP, confirming that they are working with other parties to bring forward delivery of the site.</p> <p><u>2. Delivery of additional numbers on site</u> SLDP_724 Tulloch Homes argue that in order to help address the Council's need for further housing land/numbers, and make best use of land, developing allocated sites, including H055 South Stirling Gateway, at higher densities should be allowed. This would help achieve a mix of house types and increase the deliverability of allocated sites. Suggest that the allocation of H055 allow for a number greater than 800 units.</p> <p><u>3. Allocation of additional land</u> 01567 Cala Homes and Muirhead Family seek the allocation of additional land at a site to the north of Pirnhall Road. They argue that development of this site will be seen as an appropriate extension to the allocated Housing site – South Stirling Gateway H055, is effective and would constitute a suitable long-term Green Belt boundary.</p> <p><u>4. Protection of site for Park and Ride facility</u> SLDP_193 TACTRAN note that Figure 3 within the MIR identifies a Park and Ride as part of South Stirling Gateway. States that a site should be either protected or referred to within the site assessments relative to the south of Stirling.</p> <p><u>5. Retail allocation</u> Whilst SLDP_715 The Tough Family and SLDP_256 The Stafford Trust support some level of retail provision on the site, claim that previous marketing exercises carried out for the site have shown that there is no interest amongst either major food retailer or discounters for a large scale retail unit. Therefore consider that reference to such a unit within the allocation is both unrequired and undeliverable.</p>			
<b>Stirling Council Response:</b>			
<p>1) Noted.</p> <p>2) At this stage, consider that a figure of 800 units across the allocated site is reasonable. It is accepted that this has been calculated using an 'average density' figure, and that the Masterplan indicates that areas within the allocated site may be appropriate for</p>			

development at a higher density. However, given that the Masterplan also indicates that there are areas of the site where the character, nature and context demand a lower density, coupled with the requirement for an appropriate level of open space delivered within the site, the figure indicated within the adopted LDP as an overall number is considered appropriate at this point. This does obviously not negate the fact that final numbers on the site will be determined through the planning application process. The potential for additional numbers to be considered, subject to an appropriate scheme coming forward, will be through the planning application process.

3) The current extent of site allocation H055 is considered appropriate in terms of its north-western extent. Physically it is defined by an established vehicle track, stone boundary wall and core path, which is considered a more established, effective, and appropriate that the change in topography referred to in the representations made. Furthermore, the current extent of the site allows Croftside Farm steading and Craighforth House to remain 'visible' and obvious as more rural buildings within the landscape. Consider that the area important in terms of retaining a 'green wedge' on this side of the A872, allowing Cat Craig to be discernable. The release of the area of land in question would lead to a further erosion within this area, and could lead to further demands and pressure for the development of the areas to the north.

4) The adopted LDP indicates a site for the Park and Ride, contiguous to the South Stirling Gateway site, and the draft Masterplan for the area reflects the Key Site Requirement within the LDP in this respect. The Transport Background Report supporting the MIR, makes explicit that the proposed Park and Ride are part of the proposed transport improvements.

5) In order to protect the potential for future growth and a return to demand for a range of retail sites in the Stirling area over the period of the Plan, the Proposed Plan continues with the retail strategy embedded within the adopted 2014 LDP. Given the scale of the residential allocation on H055; the desire to incorporate an appropriate mix of uses to serve this new community; the accessible nature of the site for communities (existing and proposed) to the south of Stirling; and the lack of detailed information regarding marketing exercise referred to in the submission, it is considered appropriate for a retail superstore allocation on the site. However, reference to a 4000sqm gross floor space has been deleted.

<b>Ref.</b>	60	<b>DURIESHILL</b>	
<b>Representations by:</b>			
01673 – Craig Anderson		00711 – SNP Group	
SLDP_1139 - John Brisbane and Son		<b>Total No.</b>	3
<b>Summary of Comments:</b>			
01673 (Craig Anderson) the Durieshill development is at odds with overall strategy for the city. Given its location, it is unlikely to contribute to the city in any way. Commuters to Edinburgh and Glasgow will live there and it is unlikely to contribute economically towards the city centre. This does not solve the problems that the city is facing. Cultural and economic generation depends upon integrating people with the city centre. More in favour of development within the M9/A91 boundary which would consolidate Stirling as a city and integrate the communities within that boundary. Strategically this is more sensible. Durieshill only makes sense if it is to be social housing as more people living in such houses will use the city.			

SLDP\_1139 (John Brisbane & Son) are promoting an alternative site to the south of the city and are of the view that Durieshill will not happen within the plan period as there has been no progress on the site for the past 11 years. The MIR relies on a significant contribution to the housing land supply coming from Durieshill. Large sites such as Durieshill which require up front infrastructure such as roads sewage systems schools and other facilities have a considerable lead-in time once all the approvals have been established. Given that the site will need an EIA, even if an application were to be submitted in 2016, a start on site is unlikely before 2019/20. Mr Brisbane suggests that the land supply is therefore augmented or that Durieshill is dropped from the plan.

0711 (SNP Group) Of the view that there is an overdependence on the Bannockburn ward for delivering the new housing needs of Stirling Council. If Durieshill is added, 80% of the housing allocation will take place in this ward. This shows imbalance and probable reluctance on the part of the industry to invest in building houses within the same locality. It is further complicated by the fact that traffic and education requirements have not been fully assessed.

**Stirling Council Response:**

Durieshill is Stirling’s major growth area in the current LDP, identified for the development of 2,500 houses and associated uses. Whilst the commencement of development has suffered delays throughout its time as a major growth area, the Council remains of the view that the site is deliverable. A national house builder is actively pursuing the site and discussions with landowners is well underway. The Housing Land Audit will continue to monitor its precise delivery in close consultation with the developer. It is not considered necessary to augment Durieshill with a further allocation nor is it considered appropriate to delete the site from the plan. This site plays a key role in the LDP spatial strategy which, as stated in the MIR, is remaining largely unchanged from the LDP 2014.

The comments received which doubt the contribution people living there would make to the city centre are noted. Social housing will be required on the site at a rate of 25% meaning that in excess of 600 units will be affordable in nature giving a mix of tenures. Whilst access to the strategic road network is straightforward from the site for commuting purposes, it is considered that residents of Durieshill will integrate with Stirling city centre for leisure and retailing purposes given its relatively close proximity. In addition, the LDP’s vision for the economy, the City Development Framework and the Economic Strategy will all create new jobs in the city. Housing growth areas such as Durieshill complement these strategies well by providing new housing for those employed in Stirling.

The view that there is an overdependence on the Bannockburn ward to deliver new housing is noted. However, this area is most able to accommodate new development in landscape and infrastructure terms. Most of these sites have active developer interest which suggests that the market is willing to take forward multiple sites within this area. A move away from developing Durieshill would constitute a significant departure from the current spatial strategy and it stated through the MIR this would remain unchanged. It is not considered appropriate at this stage to make any changes in this regard.

This site is carried forward to the Proposed Plan unchanged from the Stirling LDP 2014.

	61	<b>ROMAN ROAD, BALFRON (BAL01)</b>
<b>Representations by:</b>		
00082 – Messrs. A&M Paterson	<b>Total No.</b>	1

**Summary of Comments:**

00082 – Messrs. A&M Paterson The site extends to c. 7.2 ha. and is deemed suitable for further residential development and a natural extension to the allocated H086 Kiltrochan site. Access would be from Roman Road via a roundabout shared with the Kiltrochan site. It would provide a new settlement edge defined by structural woodland planting.

Scottish Planning Policy requires planning authorities to identify a generous supply of land for each housing market areas across all tenures. The MIR advises there is generosity allowance of 3.4 %, considerably less than the recommended 10-20%. The Council acknowledges allowance is therefore not being met. The Council is however of the view there is sufficient land for housing in Balfron in the next plan period.

It is considered imperative the Council should identify additional land for housing above that identified over the plan period to help support the need and demand for new housing in Balfron. The owner is fully committed to development, and the site could be brought forward as Phase 2 development beyond the H086 allocation for 35 units.

**Stirling Council Response:**

This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (BAL01). For the reasons given it was concluded it was not appropriate to identify the site as an 'option' for consideration in the MIR. Comments received in response to the MIR consultation are summarised above and generally seek to persuade the Council there are planning considerations of sufficient weight to support the allocation of the site for residential development in the Proposed Stirling Local Development Plan (PSLDP).

In response to these comments:

**Spatial Strategy and Housing Land Requirement**

At 7.2 ha this greenfield site has a potential capacity for c. 200 units.

The MIR states the underlying aims of the Spatial Strategy, as set out in the current adopted SLDP, were not being altered in the PSLDP. Having taken full account of all comments submitted in response to the MIR consultation the Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development. In particular the housing land requirement set out in the LDP fully complies with the policy principle set out in Scottish Planning Policy to identify a generous supply of housing land across all tenures, maintaining at least a 5-year supply of effective housing land at all times. Taking account of the identified allocation H086 – Kiltrochan there therefore is currently no demonstrable need for the PSLDP to allocate any additional housing land in Balfron.

**Other considerations**

As noted in the site assessment, it remains the case this scale of development raises significant implications for local social infrastructure such as schools and health care.

<b>Ref.</b>	62	<b>CARSAIG COURT, BRIDGE OF ALLAN (BOA03)</b>
<b>Representations by:</b>		
SLDP_151 – Network Rail 01397 – Peter McKenzie & Son	01628 – Ami Thomson	
	<b>Total No.</b>	3
<b>Summary of Comments:</b>		
<p>Network Rail (SLDP_151)'s submission states that no sites should be allocated for development which would physically impact on the ability to provide a bridge to replace the Cornton No. 1 level crossing, which is adjacent to the site. Network Rail have procured a study assessing the possibility of installing a road over rail bridge. Before making a final commitment to building a bridge, further design development is required to gain a better understanding of the costs and are in discussions with Stirling Council and consulting local community representatives and groups on these aspirations.</p> <p>Peter McKenzie &amp; Son (01397) note that the site is subject of a pending planning application for residential development and is now vacant, following the winding up of McKenzie Trailers. They confirm the wish the site to be considered for housing development within the local development plan.</p> <p><b>Schools</b> At an engagement session held with year 4/5 pupils at Wallace High School on 8<sup>th</sup> October, one pupil commented on the site. Ami Thomson (01628) supports development upon the site. Overall, 1 pupil did not support development of this site and 2 did not know or had no view, while 2 pupils supported development.</p> <p><b>Drop-In Sessions</b> 1 - Do not support development on the site 0 - Unsure 1 - Support development on the site</p>		
<b>Stirling Council Response:</b>		
<p>This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.</p> <p>The assessment of the site set out in the MIR remains valid. Whilst the statements of support are noted, the Council is of the view that this site cannot be allocated for housing development until the issue surrounding the adjacent level crossing is resolved.</p> <p>The site is not identified as a housing site in the proposed plan.</p>		

<b>Ref.</b>	63	<b>KNOCKHILL, BRIDGE OF ALLAN (BOA07)</b>
<b>Representations by:</b>		
SLDP_1012 – Gillian Allison	01609 – Dr & Mrs. Bowler	
	<b>Total No.</b>	2
<b>Summary of Comments:</b>		
<p>Gillian Allison (SLDP_1012) agrees with the Council's decision not to identify the site as an Additional Housing Allocation Option, noting the site is remote, prominent, within the green belt and divides Bridge of Allan and Dunblane.</p>		

Dr & Mrs. Bowler (01609) have asked the Council to re-consider the site for inclusion in the Proposed Plan. Splitting the site considered at Main Issues Report into two, it is now proposed that the lower part of the site be used for commercial leisure and recreation use. In the area around the existing buildings, the proposal is for the conversion and renovation of the steading buildings, creating 8-13 dwellings.

**School pupils**

Overall, 2 would not support development on this site, 3 were unsure and 5 would support development on this site.

**Drop in Sessions**

2 – Would not support development on this site

0 – Unsure

2 – Support development on this site

**Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.

The assessment of the site set out in the MIR remains valid and one response received to the MIR and summarised above supports the non-allocation of the site. The Council is of the view that this is not a suitable site to be allocated for housing development due to its landscape and Green Belt sensitivities and also the potential impact on the setting of Lecropt Kirk. Subject to Green Belt and Housing in the Countryside policies, the conversion and renovation of the steading buildings to create new dwellings may be appropriate.

In respect to the proposal that the lower part of the site be used for commercial leisure and recreation use, notwithstanding the sensitivities of the site noted above, the Local Development does not allocate sites for such uses.

The site is not identified as a housing site in the proposed plan and is retained within the Green Belt.

<b>Ref.</b>	64	<b>GARTUR HOUSE, CAMBUSBARRON (CAM02)</b>	
<b>Representations by:</b>			
SLDP_78 – Cambusbarron Community Council		01039 – Cycle Stirling	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
Cambusbarron Community Council (SLDP_78) are pleased with the Council's decision not to identify the site as an Additional Housing Allocation Option.			
Cycle Stirling (01039) notes that the village centre and Stirling are well within cycling distance.			
<b>Stirling Council Response:</b>			
This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the			

reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.

The assessment of the site set out in the MIR remains valid and a response received to the MIR and summarised above supports the non-allocation of the site. While the restoration and conversion of the Listed house and stables, with limited new build to complete the steading, is supported in principle, the Council is of the view that any further new build development within the grounds would be detrimental to the setting of the listed buildings. The scheme as whole therefore is not considered appropriate to allocate in the LDP.

The site is not identified as a housing site in the proposed plan and is retained within the Green Belt.

<b>Ref.</b>	65	<b>DEANSTON HOUSE, DEANSTON (DEA01)</b>	
<b>Representations by:</b>			
SLDP_272 – Stewart Milne Homes Ltd.		01039 – Gillian Allison	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
<p>Stewart Milne Homes Ltd. (SLDP_272) refute the suggestion that the site at Deanston House is an inappropriate location for housing; consider the Site Assessment contained within the Main Issues Report ignores much of their submission at the ‘Call for Sites’ stage and perpetuates the previous inaccurate suggestions that there are constraints to development.</p> <p>The arguments forwards by Stewart Milne Homes Ltd. are:</p> <ul style="list-style-type: none"> <li>▪ Conservation Area designation and the presence of a listed building/ancient monument does not preclude new development;</li> <li>▪ The Council’s concerns regarding matters of detail (e.g. traffic generation, pedestrian safety, drainage capacity, visual impact) should all be capable of resolution.</li> <li>▪ A housing allocation would be ‘enabling development’ as it would deliver the proper management and maintenance of the retained parkland, leading to enhancement of the conservation area and the setting of the listed building. The deteriorating parkland currently detracts from the setting of the listed building and conservation area;</li> <li>▪ It is disingenuous of the Council to suggest that there is a risk of flooding, distance to the River Teith and difference in levels means there is no measurable risk;</li> <li>▪ There are no capacity constraints in relation to waste water treatment and Scottish Water remain committed to working with developers to address any specific upgrading work that might be required;</li> <li>▪ The site assessment notes development would represent a discreet, isolated pocket of housing separate for the most part from the existing townscape – it is countered that it is common place in rural areas for development to take a more dispersed form than in urban areas and discreet areas of development can be the appropriate response where there is a strong landscape framework capable of containing the development. The proposed discreet areas of development at Deanston House are a response to the landscape setting and the wider benefit in maintaining and enhancing the setting of the listed building;</li> <li>▪ The potential for archaeological remains has already been addressed in previous submissions and there is no constraint to development;</li> </ul>			

- The assertion the site is remote from the village and not readily accessible by public transport is incorrect. There is an appropriate, direct pedestrian link to the site and Grierson Drive and proposals for the development of the site include provision of new footway links to Deanston Road (in the vicinity of the existing bus stop) and to the proposed adjoining housing site south of the B8032. With the existing and proposed footways all of the existing bus stops within Deanston and on Deanston Road will be within easy walking distance;
- Issues such as speed limits and street lighting are capable of resolution. The junction with the trunk road network could be improved by the installation of traffic lights and tidal movements across the Teith Bridge. This would allow an increase in the width of the footway across the bridge, creating a direct, safe pedestrian link between the site and Doune as well as Deanston;
- The council's Transport Summary is not supported by objective, technical analysis. There is no reason why development at Deanston House would be any more reliant on trips by private cars than the recent new housing development at Leny Road;
- The most recent, available data on the school capacity/roll indicates that, despite suggestions to the contrary, there will be capacity to accommodate further housing as proposed;
- The development (along with DEA02) will help to consolidate the dispersed edge of Deanston providing permeability and direct linkages between the Lochills, Ashmill and Deanston View areas and the centre of the village

Stewart Milne Homes Ltd. state There are no fundamental reasons why an element of sensitively designed development cannot take place which would enhance the landscape setting of the listed building and the conservation area and remain happy to work closely with the council in determining the appropriate balance between enabling housing development and retention/enhancement of parkland.

Gillian Allison (SLDP\_1012) agrees with the Council's decision not to identify the site as an Additional Housing Allocation Option, noting the requirement for employment opportunities.

**Stirling Council Response:**

This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.

The assessment of the site set out in the MIR remains largely valid and one response received to the MIR and summarised above supports the non-allocation of the site. The Council is of the view that this is not a suitable site to be allocated for housing development as development within this parkland landscape would harm the setting of the B-Listed Deanston House and the character of the Conservation Area and furthermore would be poorly related to the village of Deanston.

Development of the site would be contrary to the spatial strategy set out in the adopted and proposed plan for the Rural Villages Area, which envisages small-scale sustainable expansion of existing settlements consistent with their size. Deanston has recently been expanded with the development at Leny Road.

The site is not identified as a housing site in the proposed plan.

<b>Ref.</b>	66	<b>DOUNE RIGGS, DOUNE (DEA03)</b>
<b>Representations by:</b>		
SLDP_1012 – Gillian Allison	01039 – Cycle Stirling	
	<b>Total No.</b>	2
<b>Summary of Comments:</b>		
<p>Gillian Allison (SLDP_1012) agrees with the Council's decision not to identify the site as an Additional Housing Allocation Option, noting the requirement for employment opportunities.</p> <p>Cycle Stirling (01039) advise that cycle links to Callendar should be improved by extending the NCN 765. This would provide a vital cycling and active travel route from rural Stirling and Loch Lomond and the Trossachs National Park into Stirling, enhancing community links and tourism potential.</p>		
<b>Stirling Council Response:</b>		
<p>This site was submitted at the 'Call for Sites' stage in December 2014 and subject to a detailed site assessment, set out in Appendix A of the Main Issues Report. For the reasons given, it was concluded not appropriate to identify the site as an additional housing allocation option in the MIR.</p> <p>The site is identified as an employment site in the proposed plan. This reflects two extant planning permissions for the site.</p>		

<b>Ref.</b>	67	<b>DUMGOYNE, KILLEARN (KIL02)</b>
<b>Representations by:</b>		
SLDP_89 - Killearn Community Council	01314 – Brenda Pell	
	<b>Total No.</b>	2
<b>Summary of Comments:</b>		
<p>SLDP_89 - Killearn Community Council We note options to develop sites KIL01- Ibert Farm, KIL02 - Dumgoyne KIL03 - Lampson Loan and KIL04 - Lampson Road, are deemed not suitable within the plan.</p> <p>01314 – Brenda Pell Suggested sites KIL01- Ibert Farm, KIL02 – Dumgoyne, KIL03 - Lampson Loan and KIL04 - Lampson Road, have been rejected as possible options for various reasons but all suggest Killearn is not a suitable village for major housing development and this would be supported by the majority of the inhabitants.</p>		
<b>Stirling Council Response:</b>		
<p>This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (Ref: KIL02). For the reasons given it was concluded it was not appropriate to identify the site as an 'option' for consideration in the MIR.</p> <p>These comments support the conclusion of the MIR and are further addressed by the recommendation not to allocate the site for housing in the PSLDP. Some development may, however, be possible through the Housing in the Countryside policies.</p>		

<b>Ref.</b>	68	<b>LAMPSON LOAN, KILLEARN (KIL03)</b>
<b>Representations by:</b>		
SLDP_89 - Killearn Community Council	01314 - Brenda Pell	
SLDP_719 - WS Gordon IV Trust	<b>Total No.</b>	3
<b>Summary of Comments:</b>		
<p>SLDP_89 - Killearn Community Council We note options to develop sites KIL01- Ibert Farm, KIL02 - Dumgoyne KIL03 - Lampson Loan and KIL04 - Lampson Road, are deemed not suitable within the plan.</p> <p>SLDP_719 - WS Gordon IV Trust The LDP's Spatial Strategy supports: i) Small-scale expansion of the Rural Villages; ii) Concentrating development within settlements; and iii) Helping sustain local services. It requires 50 units to be provided within Killearn. The LDP allocated 30 units at Blaressan and 6 units at Crosshead Road. The Housing Need and Demand Assessment has shown there to be high levels of need and high house prices in the Stirling Rural sub-area, which includes Killearn.</p> <p>There is a particular need for affordable housing in Killearn. Rural Stirling Housing Association also supports the allocation of land for affordable housing.</p> <p>The site at Lampson Loan is a small site suitable for affordable housing and would be consistent with the Spatial Strategy for the village, i.e. i) Small scale incremental development; ii) Opposite/Contiguous with existing houses; iii) Continues pattern of development; iv) 100% affordable housing supported by Rural Stirling HA; v) Easy, safe access; and vi) Adjacent to existing services.</p> <p>01314 - Brenda Pell Suggested sites KIL01- Ibert Farm, KIL02 – Dumgoyne, KIL03 - Lampson Loan and KIL04 - Lampson Road, have been rejected as possible options for various reasons but all suggest Killearn is not a suitable village for major housing development and this would be supported by the majority of the inhabitants.</p>		
<b>Stirling Council Response:</b>		
<p>This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (Ref: KIL03). For the reasons given it was concluded it was not appropriate to identify the site as an 'option' for consideration in the MIR.</p> <p>Comments received in response to the MIR consultation are summarised above. Comments from SLDP_719 - WS Gordon IV Trust generally seek to persuade the Council there are planning considerations of sufficient weight to support the allocation of the site for residential development in the Proposed Stirling Local Development Plan (PSLDP).</p> <p>Remaining comments support the conclusion of the MIR that the site should not be identified as a housing option.</p> <p>In response to these comments:</p> <p><u>Spatial Strategy and Housing Land Requirement</u> This site is promoted for affordable housing, circa 4-6 housing units.</p> <p>The MIR states the underlying aims of the Spatial Strategy, as set out in the current adopted SLDP, were not being altered in the PSLDP. Having taken full account of all</p>		

comments submitted in response to the MIR consultation the Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development. In particular the housing land requirement set out in the LDP fully complies with the policy principle set out in Scottish Planning Policy to identify a generous supply of housing land across all tenures, maintaining at least a 5-year supply of effective housing land at all times.

Taking account also of the housing allocation H102 - Blairessan there therefore is currently no demonstrable need for the PSLDP to allocate any additional housing land in Killearn. Whilst it is noted allocation for affordable housing is supported in principle by the Rural Stirling Housing Association the H102 allocation will also provide a 33% affordable housing contribution.

Other considerations

Notwithstanding commentary in the supporting submission and the comparatively small scale of the development there remains significant concerns over the locational shortcomings of the site, particularly its relative remoteness from village services and amenities and adverse impact on placemaking and the landscape setting of the village.

Other Comments

These have been noted and are addressed by the recommendation not to allocate the site for housing.

<b>Ref.</b>	69	<b>LAMPSON ROAD, KILLEARN (KIL04)</b>	
<b>Representations by:</b>			
SLDP_89 - Killearn Community Council		01314 - Brenda Pell	
SLDP_719 - WS Gordon IV Trust		<b>Total No.</b>	3
<b>Summary of Comments:</b>			
<p>SLDP_89 - Killearn Community Council We note options to develop sites KIL01- Ibert Farm, KIL02 - Dumgoyne KIL03 - Lampson Loan and KIL04 - Lampson Road, are deemed not suitable within the plan.</p> <p>SLDP_719 - WS Gordon IV Trust The LDP's Spatial Strategy supports: i) Small-scale expansion of the Rural Villages; ii) Concentrating development within settlements; and iii) Helping sustain local services. It requires 50 units to be provided within Killearn. The LDP allocated 30 units at Blairessan and 6 units at Crosshead Road. The Housing Need and Demand Assessment has shown there to be high levels of need and high house prices in the Stirling Rural sub-area, that includes Killearn.</p> <p>There is a particular need for affordable housing in Killearn. Rural Stirling Housing Association also supports the allocation of land for affordable housing.</p> <p>The site at Lampson Road is a small site suitable for affordable housing and would be consistent with the Spatial Strategy for the village, i.e. i) Small scale incremental development, ii) Opposite/Contiguous with existing houses, iii) Continues pattern of development, iv) 100% affordable housing supported by Rural Stirling HA, v) Easy, safe access and , vi) Adjacent to existing services.</p>			

01314 - Brenda Pell

Suggested sites KIL01- Ibert Farm, KIL02 – Dumgoyne, KIL03 - Lampson Loan and KIL04 - Lampson Road, have been rejected as possible options for various reasons but all suggest Killlearn is not a suitable village for major housing development and this would be supported by the majority of the inhabitants.

**Stirling Council Response:**

This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (Ref: KIL04). For the reasons given it was concluded it was not appropriate to identify the site as an 'option' for consideration in the MIR.

Comments received in response to the MIR consultation are summarised above. Comments from SLDP\_719 - WS Gordon IV Trust generally seek to persuade the Council there are planning considerations of sufficient weight to support the allocation of the site for residential development in the Proposed Stirling Local Development Plan (PSLDP).

Remaining comments support the conclusion of the MIR that the site should not be identified as a housing option.

Spatial Strategy and Housing Land Requirement

This site is promoted for affordable housing, circa 4-6 housing units.

The MIR states the underlying aims of the Spatial Strategy, as set out in the current adopted SLDP, were not being altered in the PSLDP. Having taken full account of all comments submitted in response to the MIR consultation the Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development. In particular the housing land requirement set out in the LDP fully complies with the policy principle set out in Scottish Planning Policy to identify a generous supply of housing land across all tenures, maintaining at least a 5-year supply of effective housing land at all times.

Taking account also of the housing allocation H102 - Blairessan there therefore is currently no demonstrable need for the PSLDP to allocate any additional housing land in Killlearn. Whilst it is noted allocation for affordable housing is supported in principle by the Rural Stirling Housing Association the H102 allocation will also provide a 33% affordable housing contribution.

Other considerations

Notwithstanding commentary in the supporting submission and the comparatively small scale of the development there remains significant concerns over the locational shortcomings of the site, particularly its relative remoteness from village services and amenities and adverse impact on placemaking and the landscape setting of the village.

Other Comments

These have been noted and are addressed by the recommendation not to allocate the site for housing.

<b>Ref.</b>	70	<b>MANOR POWIS (MAN01)</b>
<b>Representations by:</b>		
SLDP_704 -Tom Cox	01039 – Cycle Stirling	
	<b>Total No.</b>	2
<b>Summary of Comments:</b>		
<p>SLDP_704 – Tom Cox Recommend that the land is allocated for the proposed development in the Proposed LDP, as justified by information submitted at the Call for Sites stage.</p> <p>The proposed residential element is on greenfield land (approx. 16.2 ha.), predominantly agricultural but incorporating farm buildings and holiday cottages. A low density, high quality 'eco-village' housing is proposed, c. 120 dwellings. It will incorporate a combination of renewable/sustainable energy innovations to provide a 'state-of-the-art' community comprising new homes, open space and facilities to the highest design and 'zero carbon' standards. Higher density would also be supported, up to 458 units based on 30 units per ha. A range of house types will be accommodated and affordable housing provided in accordance with Council policy. Development would take account of known flood risks. Drainage solutions are under active discussion with SEPA and Scottish Water. Access taken from A907 via local road (Alloa Road). Local bus network accessible from A907 and adjacent access to footpath and National Cycle Network.</p> <p>The proposal will contribute towards meeting identified short fall in the housing land requirement. In addition, alongside proposals for wide ranging mix of uses on land to the north and a solar farm to the south, it will comply with the LDP's Vision and Spatial Strategy.</p> <p>01039 – Cycle Stirling Established off road cycle routes to the east, but heading west they stop at Manor Powis roundabout junction, a top cycle hot spot and barrier. The A907 and A91 are too busy to promote active travel and urgently need off road alternatives for current and potential uses. Good cycle link via Blairmains/Blairlogie, though improved signage and a crossing would help pedestrians cross the A907.</p>		
<b>Stirling Council Response:</b>		
<p>This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (Ref: MAN 01). For the reasons given it was concluded it was not appropriate to identify the site as an 'option' for consideration in the MIR.</p> <p>Comments received from SLDP_704 - Tom Cox in response to the MIR consultation are summarised above and generally seek to persuade the Council there are planning considerations of sufficient weight to support the allocation of the site for housing development, as a component part of a wider mixed use development, in the PSLDP.</p> <p>Comments from 01039 - Cycle Stirling seek improvements to local cycling infrastructure in association with the development.</p> <p>In response to these comments:</p> <p><u>Spatial Strategy and Housing Land Requirement</u> This site is being promoted for between 120 – 485 housing units, as part of a wider mixed use development.</p>		

The MIR states the underlying aims of the Spatial Strategy, as set out in the current adopted SLDP, were not being altered in the PSLDP. Having taken full account of all comments submitted in response to the MIR consultation the Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development. In particular the housing land requirement set out in the LDP fully complies with the policy principle set out in Scottish Planning Policy to identify a generous supply of housing land across all tenures, maintaining at least a 5-year supply of effective housing land at all times.

There therefore is currently no demonstrable need for the PSLDP to allocate any additional housing land at Manor Powis.

Other considerations

As highlighted in in the site assessment development at this scale has significant implications for primary and secondary school provision. In addition all pupils would require to be bussed or rely on private transport. The assessment also identifies a range of other considerations associated with this scale of development, including flood risk, placemaking, landscape impact and remoteness from services and amenities. Notwithstanding commentary in the supporting submission, and taking particular account of proposed 'low carbon' design and solar energy park, there remains significant concerns over the long term adverse planning and environmental impacts of this scale of development at this relatively isolated location.

Other Comments

The comments of 01039 - Cycle Stirling have been noted. Potential for improvements to local cycle routes would be a material consideration in the event the site was allocated for development.

<b>Ref.</b>	71	<b>PLEANBANK FARM, PLEAN (PLE01)</b>	
<b>Representations by:</b>			
SLDP_1286 – Scottish Wildlife Trust		1039 – Cycle Stirling	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
<p>SLDP_1286 - Scottish Wildlife Trust            We previously commented on this and it is good to see that Pleanbank Wood is now recognised as a provisional LNCS. The woodland should definitely be protected and it is worrying to see that the developers have now included it in the area for potential development. The adjacent rough grassland is also rich in biodiversity with good populations of plants characteristic of unimproved meadows. If alternative sites are available this area should remain undeveloped.</p> <p>1039 - Cycle Stirling            The busy A9 and motorway create difficult barriers for cycling within Plean, and connecting it with current and future neighbouring communities and employers, e.g. FVRH. Cycling links should be planned at the earliest stages. Need for specified local improvements to encourage cycling.</p>			

**Drop in Sessions**

0 – Would not support development on this site

0 – Unsure

1 – Would support development on this site

**Stirling Council Response:**

This site was submitted at the 'call for sites' stage and subject to a detailed site assessment, as set out in the MIR (Ref: PLE01). For the reasons given it was concluded it was not appropriate to identify the site as an 'option' for consideration in the MIR. It also remains the case there has been no meaningful progress with the conclusion of s.75 agreement associated with an outline planning permission which the Council was minded to grant in January 2009. Having further regard to the Spatial Strategy and housing land requirement set out in the PSLDP, and the identified H069 Cushenquarter allocation in Plean itself, there therefore is currently no demonstrable need for the PSLDP to allocate this site for housing purposes.

The concerns raised by SLDP\_1286 - Scottish Wildlife Trust and 1039 - Cycle Stirling have been noted and are addressed by the recommendation not to allocate the site for housing. Potential for improvements to local cycle routes would be a material consideration in the event the site was allocated for development.

<b>Ref.</b>	72	<b>GLASGOW ROAD, WHINS OF MILTON (STR01)</b>	
<b>MIR Ref.</b>	STR01	<b>Officer:</b>	EF
<b>Representations by:</b>			
01039 – Cycle Stirling	<b>Total No.</b>	1	
<b>Summary of Comments:</b>			
Cycle Stirling have made some general comments on this site stating that it is adjacent to the only safe cycle route to the south (Carron Valley and Plean via Roman Road) avoiding the A872, the motorway and services junction. Over the A782 is the Bannockburn heritage trail at Milton and part is accessible by cycle to Bannockburn.			
<b>Stirling Council Response:</b>			
Cycle Stirling's comments on this site are noted.			

<b>Ref.</b>	73	<b>CATHERINE STREET, STIRLING (STR03)</b>	
<b>Representations by:</b>			
SLDP_1012 – Gillian Allison	SLDP_126 – Scottish Water		
	<b>Total No.</b>	2	
<b>Summary of Comments:</b>			
Gillian Allison (SLDP_1012) Supports allocation of the site			
Scottish Water (SLDP_126) Note that there is capacity for new development at waste water treatment works. There is also adequate water supply, possible further investigation required on local network. Developer should contact Scottish Water as early as possible.			

**Drop in Sessions**

- 2 – Do not support development of this site
- 0 – Unsure
- 2 – Support development of this site

**Stirling Council Response:**

Responses noted. This site is identified for housing development in the Proposed Plan.

<b>Ref.</b>	74	<b>FORMER BANNOCKBURN HOSPITAL (STR07)</b>	
<b>Representations by:</b>			
SLDP_137 – NHS Forth Valley		01039 – Cycle Stirling	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
<p><u>Non allocation of the site</u>  NHS Forth Valley (SLDP_137)  Note the comments from the site assessment that the site is not identified as an option in the MIR and that the site is better suited for the crematorium use as put forward by a recent PAN. Consider that since there has been developer interest for the use of the site for residential purposes all options for the site should be maintained and progressed. Consider that this demonstrates that the site would be highly deliverable and effective in the short term. State that the Council's assessment of the site should not be prejudiced by the PAN submission as NHSFV is not responsible for, or party to, this.</p> <p><u>Background to site</u>  NHS Forth Valley (SLDP_137)  The site is the former grounds of Bannockburn Hospital which closed in 2012. The site is approx. 2.1ha and is located 2.8miles south east of Stirling City Centre, south of the A91. All buildings have been cleared from the site and is suitable for a housing development of around 50 units. State that the site has been marketed for 2 years and bids received primarily from residential developers and 1 commercial developer.</p> <p><u>Flood Risk and water quality</u>  NHS Forth Valley (SLDP_137)  Note that the Council does not consider there to be any known risk of flooding on the site. A development impact assessment was submitted to Scottish Water to determine constraints on the network. The assessment concluded there was sufficient capacity on the local network.</p> <p><u>Topography and Ground conditions</u>  NHS Forth Valley (SLDP_137)  Relevant technical surveys covering ground contamination, topography and soil would be completed in line with requirements.</p> <p><u>Greenbelt/Green network</u>  NHS Forth Valley (SLDP_137)  Note that the site is not in the green belt. Consider that the proposal could lead to improvements to active travel and habitat connectivity.</p> <p><u>Placemaking</u>  NHS Forth Valley (SLDP_137)</p>			

Consider that the principle of development on this site is supported through existing planning policies. The proposal addresses the principles of both the Council's Countryside Design Guidance and the Scottish Governments Designing Places and Designing Streets guidance. The submission is accompanied by an indicative design proposal that justifies the proposals and creates a safe and pleasant environment. Siting and distribution of house types will be carefully considered to create a rural enclosure and maintain the natural edge. The design will create a rural identity appropriate within this context.

#### Landscape Impact

NHS Forth Valley (SLDP\_137)

Recognise that the site slopes upwards from the A91 frontage and that some areas of the site are highly visible from the A91. The proposed development will strengthen the existing boundary and enhance a sense of place. Views from the site out to the North/East will be maintained.

#### Historic Environment

NHS Forth Valley (SLDP\_137)

Note the Council's comments in the site assessment that development of the site will not impact on the sites designation as part of Sauchieburn Battlefield.

#### Biodiversity

NHS Forth Valley (SLDP\_137)

Acknowledge the Council's comments in the site assessment that biodiversity enhancement is considered further and this would form part of any development proposal which comes forward.

#### Transport and Access

NHS Forth Valley (SLDP\_137)

Consider that although the site is detached from the existing settlement the proposal can offer improvements to active travel by enhancing existing facilities. A variety of improvements including reducing the speed limit on the A9 between the site and the A91 and widening some sections of an existing footpath on the west side of the A9. The proposals are relatively modest but can bring about significant improvements. Consider the site to be well located in location to key destinations for cyclists, but that there are no existing formal cycle facilities in the vicinity of the site. The existing pedestrian footways could be utilised and that confident cyclists could use the A9, supported by the proposed change to speed limits. The site is considered to be well placed for public transport due to existing facilities. Car access to the site would be via a new ghost island priority junction on the A9. Visibility splays could be enhanced in line with current standards. Consider that trip generation from the site would be low and there would not be an adverse impact on the wider road network.

#### Cycle Stirling (01039)

Consider that identification of the site is an opportunity to increase pedestrian and cycle links in the area and provide a new bridge to cross the nearby motorway junctions and create attractive green travel routes away from the busy roads. Consider that this would encourage local residents to cycle to nearby destinations and attract tourists using the nearby NCN 754.

#### Social and Economic

NHS Forth Valley (SLDP\_137)

Note the Council's comments on education constraints at the sites catchment Schools in Bannockburn, but consider that these could be appropriately considered at a later date where a planning application submitted. Consider the development of the site would bring

about significant improvements to the site and wider area, particularly with regards to road safety and access.

**Stirling Council Response:**

Whilst it is accepted that there is developer interest in developing the site for residential use, this does not in itself suggest that this should be the preferred use for redevelopment of this site. As noted by the site assessment, the site is separated visually and physically, from the Stirling urban area and sites south of the A91. Development of the scale proposed, approximately 50 units, would appear as an isolated development in the Countryside and would not be in keeping with the surrounding landscape and open views.

The Council would reiterate that as a brownfield site, it would be preferential to redevelop this site. However, the use and scale, of the development would need to be in keeping with the sites location and visual impact. The Council would not suggest that housing is not an appropriate use on this site, however any application for housing development would need to be in line with the Housing in the Countryside Policy of the Proposed Plan. A development of the scale proposed is unlikely to be considered acceptable under this policy.

This site is not allocated for development in the Proposed Plan.

<b>Ref.</b>	75	<b>BACK O’MUIR FARM (STR08)</b>	
<b>Representations by:</b>			
SLDP_48 – Wallace Land Investment Management		01039 – Cycle Stirling	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
<p><u>Non allocation of site</u> Wallace Land Investment Management (SLDP_48) Do not agree with the sites non-inclusion as an option in the MIR. Consider the site to be effective and can meet housing needs. Consider that when assessed against the vision and spatial strategy of the plan it is difficult to understand a number of green belt releases when other non-green belt sites exist. State that the site meets the criteria as set out on page 31 of the MIR, these criteria being consistent with national policy and guidance, and there is no reasonable basis up which the site should not be supported. Consider that the site assessment process does not take account of these criteria. In addition the site is justified on the basis of the housing land supply position and other development in the area. This is discussed further in issue 3 Housing Land Supply.</p> <p><u>Overall Assessment</u> Wallace Land Investment Management (SLDP_48) Do not agree with the assessment in the MIR that development of the site would be premature in advance of the completion of other strategic sites in the LDP. Cite the inclusion of Airthrey Kerse as an option in the MIR as this is not predicated by completions of strategic sites. Accept that development of the site would represent expansion of the built area but that this is not a reason alone to preclude development. The site would not have any adverse impact on landscape. The site has well defined boundaries and cite the picture on page 26 of the MIR as showing that the site relates well to the existing urban area.</p> <p><u>Water Quality</u> Wallace Land Investment Management (SLDP_48)</p>			

Consider that on a development of this scale there will be a requirement to reinforce existing connections, and that this cannot weigh against the acceptability of the proposed allocation of the site. State that in the preparation of the detailed infrastructure design, relevant bodies will be consulted to ensure the development does not have any adverse impact. Consider that the proximity of the site to the Norbord pulp plant does not represent an impediment to development of the site. State that the site is no more at risk than the nearby allocation of South Stirling Gateway, and note that the Norbord plant is in Cowie, which has 3 housing allocations where the Council do not seem to be concerned about the impact of the plant on these.

#### Topography and Ground Conditions

Wallace Land Investment Management (SLDP\_48)

Consider that the topography of the site lends itself to large scale development without impacting on views into or out of the site. The issue of previous mining activity is known to the promoters and there is no known or anticipated geotechnical considerations to preclude development.

#### Green Belt

Wallace Land Investment Management (SLDP\_48)

Consider that the site should be preferable for development in advance of the proposed green belt releases of Airthrey Kerse and Hillside. Consider that in the event that the Council consider these releases to be required to support the provision of a generous and effective supply of housing land then this should have been accompanied by a review of the boundaries of the green belt. Consider that this approach would have been open and transparent and would have allowed for party's to interrogate the Council's approach.

#### Green Network

Wallace Land Investment Management (SLDP\_48)

Do not agree with the comments in the site assessment in the MIR that the site would not be able to make a meaningful contributions towards improvements to the green network. The site is no worse off than the South Stirling Gateway allocation in its ability to make a meaningful contribution to establishing more active travel patterns between the site and surrounding area. Cite the picture on page 26 of the MIR as demonstrating this.

#### Placemaking

Wallace Land Investment Management (SLDP\_48)

Consider it is clear from the Landscape Character Assessments that the site could accommodate development without giving rise to any adverse impacts. This is due to the nature of the topography. Consider it unreasonable to describe the site as being rural in character and unrelated to any settlement. Cite the picture on page 26 of the MIR as demonstrating that this is not the case. State the site would appear as a logical extension of South Stirling Gateway, although could be developed individually. Subject to careful design of the development there is no basis to conclude that the site would lead to sprawl in the countryside. State that placemaking guidance from the Scottish Government would form an integral part of the design process. Consider that at this stage there is no basis to conclude that the site would not be able to make a meaningful and positive contribution towards the wider placemaking agenda.

#### Landscape Impact

Wallace Land Investment Management (SLDP\_48)

Consider that a number of independent studies have shown that the site is capable of accommodating development and that a LVIA is not required to establish this at this stage, however this would be required later to inform the detailed design. State it does not appear that a LVIA studies are in place to justify the preferred option sites of Airthrey Kerse and Hillside.

### Historic Environment

Wallace Land Investment Management (SLDP\_48)

The site falls within the boundary of the inventory of the Battles of Bannockburn and Sauchieburn. This is not an impediment to development as both the Durieshill and South Stirling Gateway allocations are within this boundary. Archaeological considerations would form an integral process of the development of the site and would respect the setting of the nearby Bannockburn House. Consider that this could be done without compromising the development potential of the site.

### Biodiversity

Wallace Land Investment Management (SLDP\_48)

Consider there is no reason that with the application of appropriate measures that the site could not make a positive contribution towards biodiversity enhancements. The site in its current form makes a limited contribution towards the overall biodiversity value of the surrounding area.

### Active Travel

Cycle Stirling (01039)

Consider that identification of the site is an opportunity to increase pedestrian and cycle links in the area and provide a new bridge to cross the nearby motorway junctions and create attractive green travel routes away from the busy roads. Consider that this would encourage local residents to cycle to nearby destinations and attract tourists using the nearby NCN 754.

Wallace Land Investment Management (SLDP\_48)

Accept and acknowledge that further consideration is required to assess the most appropriate means of accessing the site. Initial work suggests that satisfactory access, taking into account the needs of pedestrians could be provided which would not lead to loss of capacity on the A91.

### Public Transport

Wallace Land Investment Management (SLDP\_48)

Appropriate provision for public transport access to the site will form part of the detailed design of the site. Consider that there is no basis at this stage to suggest that the site could not be suitably served by public transport. The site is well placed to enhance and provide new public transport connections. These could be delivered through a Section 75 Agreement.

### Transport Summary

Wallace Land Investment Management (SLDP\_48)

Do not accept the view that the site will be any more disconnected from existing facilities than South Stirling Gateway and that the site will be in easy reach of the facilities proposed on that site as part of the South Stirling Gateway Draft Masterplan. Consider that the connectivity by both public and private transport is comparable as they would share a common access. Submit that if the Council is content to support South Stirling Gateway then there is no justifiable case to not reach the same conclusion for Back O'Muir Farm.

### Social and Economic Assessment

Wallace Land Investment Management (SLDP\_48)

Consider there is no basis to state that the site would or could not be well served by public transport. In addition consider that with regards to infrastructure, the site is better placed than Durieshill to deliver this and that this could be secured by a Section 75 Agreement.

**Stirling Council Response:**

This site, along with all sites submitted at 'call for sites' stage was subject to a site assessment and consultation from key agencies. With regard to the comments regarding the site meeting the criteria set out on page 31 of the MIR, the Council is still of the opinion that the site does not meet all these criteria. The site assessment concludes that the site would be of a scale, and in a location, not consistent with the LDP Vision and Spatial Strategy. Development of this location would cross the A91 and expand the settlement into open countryside. It is considered that the A91 forms a strong boundary to the edge of Bannockburn.

The site can also not be thought of in isolation. The site sits adjacent to the South Stirling Gateway allocation for 800 units, cumulatively this would amount to approximately 1400 units being proposed for the A91 corridor. Again, it is reiterated that this would remove the strong boundary of the A91 and invite further expansion to the south.

With regard to the comments that the site would be premature in advance of other strategic sites, the Council reiterates these comments. The applicant's reference to Airthrey Kerse is not accepted as comparable as the sites vary in many respects. The site assessment for Airthrey Kerse concluded that the site, although not without constraints, was broadly compliant with the LDP Vision and Spatial Strategy and therefore sequentially preferable to further greenfield release to the south and south east of the city. Airthrey Kerse has, since this assessment was carried out, subsequently not been carried forward in the Proposed Plan as the concurrent application for the site has been refused.

Both South Stirling Gateway and Durieshill have been carried forward in to the Proposed Plan. The Council is committed to delivering both these Strategic sites and the Action Programme sets out how this is to be achieved. It is not accepted at this time either, or both, of these sites are undeliverable or that there is a need to allocate further strategic sites. It is accepted that Durieshill is progressing slower than anticipated, however the Proposed Plan demonstrates a compliance with housing land supply policies as set out in SPP 2014 and a 5 year supply at adoption can be shown. On this basis the inclusion of the site is not warranted.

In summary, the Council remains of the opinion that this site would represent a significant departure from the LDP Vision and Spatial Strategy and there are no other factors which would lead the Council to propose the site for development through the LDP. This site is therefore not allocated in the Proposed Plan.

<b>Ref.</b>	76	<b>KILDEAN (STR13)</b>
<b>Representations by:</b>		
01039 – Cycle Stirling	SLDP_126 – Scottish Water	
	<b>Total No.</b>	2
<b>Summary of Comments:</b>		
<p>Cycle Stirling (01039)          Suggest there is a need and opportunity at the point to strengthen cycle routes with the City and the West. State that there is an opportunity to improve the access across pipe bridge and core path for cyclists. If the Kildean Link Road is proposed then cycling should be prioritised to make it easier and safer for cyclists and assist with the required modal shift.</p>		

Scottish Water (SLDP\_126)  
 Note that there is capacity for new development at waste water treatment works. There is also adequate water supply, possible further investigation required on local network. Developer should contact Scottish Water as early as possible.

**Stirling Council Response:**

The comments by Cycle Stirling are noted. The Council supports making active travel routes more attractive to encourage the modal shift as set out in the Local Transport Strategy. The proposed site would not directly be expected to provide upgraded paths due to the sites location and previously consented uses surrounding the site. However any contribution to active travel infrastructure would be in line with SG14: Ensuring a Choice of Access for New Developments.

The comments from Scottish Water are noted. This site is identified for housing development in the Proposed Plan.

<b>Ref.</b>	77	<b>RIVERSIDE POOL, STIRLING (STR15)</b>	
<b>Representations by:</b>			
SLDP_126 – Scottish Water		01431 – David Duncan	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
<p>Scottish Water (SLDP_126) note that there is currently capacity for this development, although possible further investigation required on local network. Recommended developer contact Scottish Water as early as possible.</p> <p>David Duncan (01431) does not raise any objection to the development of the site. However, requests that development of the site should explore the possibility to enhance the gas supply and extend it to properties on Forthview.</p>			
<b>Stirling Council Response:</b>			
<p>Note response from Scottish Water.</p> <p>With regards to gas supply, development on this site was approved through planning application number 15/00005/FUL on 28/5/15. This is not an issue the Local Development Plan or the application can reasonably take account of.</p> <p>This site is identified for housing development in the Proposed Plan.</p>			

<b>Ref.</b>	78	<b>ARGYLL CENTRE, STIRLING (STR16)</b>	
<b>Representations by:</b>			
01463 – Keith Potter		SLDP_126 – Scottish Water	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
<p>Keith Potter (01463)          Suggests that any new development on the site should not be taller than the existing centre and there is a need to avoid overlooking, or blocking the outlook of, of existing properties on Darnley Street. Also suggests that development on the site should include</p>			

provision to tidy up the waste ground between Darnley and Princess Streets and reopen the stairway between the two.

Scottish Water (SLDP\_126) note that there is currently capacity for this development, although possible further investigation required on local network. Recommended developer contact Scottish Water as early as possible.

**Drop in Sessions**

0 – Do not support development of this site

0 – Unsure

4 – Support development of this site

**Stirling Council Response:**

Comments on design are noted. The Council already has a Planning Brief for this site in the form of Supplementary Guidance 08 Argyll Centre. This document addresses many of the concerns raised by Keith Potter (01463) and will be a material consideration in the assessment of any planning application submitted for the site.

The comments from Scottish Water (SLDP\_126) are noted.

This site is not identified in the Proposed Plan for housing development as it is now identified under the City Development Framework for use as a workshop space for traditional skills by apprentices, Forth Valley College and the University of Stirling.

<b>Ref.</b>	79	<b>SOUTH KILDEAN, STILRING (STR18)</b>	
<b>Representations by:</b>			
01039 – Cycle Stirling		01617 – CCG	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
01039 (Cycle Stirling) have stated that there is a need for cycle route links and crossing points at this site.			
01617 (CCG) has submitted a representation in support of the development of the site at south Kildean, Stirling. The proposal has been named 'Stirling Western Gateway'. CCG would take a master planned approach to development of the site to form an integrated gateway development of national importance.			
CCG have set the development proposal within the context of the City Development Framework (CDF). It acknowledges that Stirling has already taken ambitious steps to improve the offer of the city on a strategic scale and that six signature concepts are being developed. One of these projects is a 'City Park' which would act as an entry point to the city, attracting people to the castle and the wider city. CCG would like to ally with Stirling Council to deliver this aspect of the CDF vision.			
<u>Housing Land Supply</u>			
There is currently a shortfall of effective housing land to secure a generous supply to meet growth ambitions. Whilst land has been identified, CCG are of the view that more effective land is needed. In the context of the current adopted plan, there is only a 4.1% generosity which falls significantly below SPPs 10-20%. The MIR presents three options which would provide up to 14.6% generosity but this relies on some high delivery targets for major developments to the south and east of Stirling. CCG consider that more can be done to			

provide a security of housing land supply by providing 20% generosity in more marketable locations. Their proposal is to provide a new 'urban village' would succeed in achieving this.

#### Site Context

The historic context of the surrounding area is important to the proposal. The south eastern corner of the site is located within the Stirling Town and Royal Park Conservation Area and land further to the east at King's knot, beyond Raploch Road, is included within the Historic Environment Scotland Inventory of Gardens and Designed Landscapes. Stirling Castle and King's Knot are also designated as Scheduled Monuments. Whilst there are no listed buildings or structures within the proposed site, there are a significant amount of listed buildings within relatively close proximity of the site including the A listed Stirling Castle and other listed buildings and structures to the east, the Category B listed King's Park and boundary wall to the south and the category B listed Craigforth Hill to the west.

#### 'Stirling's Western Gateway'

Over the last 25 years the Kildean gateway has changed significantly with developments taking place at Kildean and Castle Business Park being created. There are allocations and consents for over 250 new houses to be built at Kildean in addition to the new college campus. This has collectively led to a change in character of this area. To the south, Falleninch Junction has remained much more rural in feel.

#### Development Components

CCG aim to create two sustainable gateway developments into the city from the west. The development itself has three key components. *Kildean Village* is a mixed use mixed density place. A new model village and gateway location containing a mix of uses shops, cafes, restaurants and a mix of business units as well as a mix of housing at different densities. The precise mix of uses is open for discussion. Large scale public buildings / educational uses can also form part of the approach. *The Three Parks* will become a visitor attraction in its own right. This will meet the Council's City Development Framework aspirations for a Heritage park while acting as a true destination to introduce what the City of Stirling has to offer. Inspired by the transformational impact of the Kelpies and Helix park in Falkirk, it will offer a Heritage park, People's Park and Carse Park.

*Falleninch Heritage Gateway* will provide a House of Bruar type commercial development on the site of Falleninch Farm. This could utilise the proposed new slipways from the M9 to provide a destination and focal point for tourism and for residents across central Scotland. This redevelopment could also provide a purpose built visitor coach parking area to replace or support the existing coach area on Glendevon Road and to direct visitors to viewing features within the park.

CCG are of the view that a proposal of this scale and ambition should ideally be delivered through the development plan process. CCG is confident that this Stirling Western Gateway proposal can be significantly more developed as an idea within the next six to nine months to tie in with progress with the development plan. It is believed that with support the site could be delivered within the first five years of the emerging development plan. CCG consider that the MIR stage of the plan should be used to embrace and consider ambitious ideas as to how Stirling can strive towards meeting its full potential over the next decade. This should include potential for beneficial amendments to the adopted Spatial Strategy, such as to green belt boundaries or the allocation requirements for major retail and employment proposals. For this reason, CCG do not agree that the MIR has not invited discussion on any amendments to Stirling's overall vision and spatial strategy.

### Landscape Character

CCG notes that SG28, landscape Character Assessments identifies the site as forming a small part of the eastern edge of Landscape Character Area 2, L2 Carse West of Stirling. It is a large area comprising the broad, flat valley floor of the River Forth which is in contrast to rising ground to the north, south and the crags of Stirling Castle, Craigforth and Abbey Craig to the east. Key sensitivities of this area include: role and importance of the open landscape in the setting of key natural and cultural heritage features, cumulative effects of development which can erode the distinct identity and quality of the landscape, relatively large viewing population from key public viewpoints, settlements and routes with panoramic views within and across the landscapes particularly important and strong horizontal emphasis which makes the landscape particularly sensitive to the introduction of tall structures.

CCG is of the view that the proposal affords the opportunity to enhance the relationship between the carse landscape to the east of the M9 and Stirling Castle and the Kings Knot through the creation of the Three Parks. The implementation of the Three Parks and structural landscape associated with Kildean Village will, in CCG's view, make a positive contribution to the wider Stirling Green Network.

CCG notes that the Council has concerns about the site of the Kildean Village not being suitable for residential development but argues that this development would provide an opportunity to enhance the landscape condition and management of the site and unlock potential for this area to provide further open space opportunities including a venue for events and scope for interpretation of the wider historic landscape through the provision of the Three Parks.

### Green Belt

The site is contained within Stirling Green Belt which almost entirely surrounds the City of Stirling. Whilst the landscape setting of historic features is considered to be a particularly important part of the identity of Stirling and the surrounding area, SG03 Green Belts notes that green belts are not used as a designation to protect natural heritage. The site forms part of the landscape setting of Stirling Castle, former part of the expansive carse landscape to the west and north west of the castle and affords views of Castle Craig and long distance views of the Wallace Monument and Abbey Craig beyond Stirling Castle.

Masterplanned development of this site offers the opportunity to enhance the understanding and appreciation of the setting of the castle and to manage, maintain and enhance the land to the immediate west of Stirling Castle as a part of the wider green network with stronger links to the settlement of Stirling. The site assessment carried out in 2015 for the Kildean Village area only was concerned that the site did not have a strongly enough designed southern boundary. CCG's proposal would see the larger Three Parks area retained as greenbelt but would improve public access to this area.

### Views

Views from the castle would be enhanced by the Three Parks area with potential for a unique floor mural artwork to tell the story of Stirling. The proposed built development would be seen in the context of the large scale carse and landscape and Touch hills beyond.

The majority of Kildean Village will be screened by the woodland and landform to the west. CCG is of the view that it would be located within the least sensitive location for impact on landscape character and views, both from the carse and from Stirling. A linear park within the Kildean Village would maintain a visual corridor which frames the view towards the Wallace monument from the M9 and within Kildean Village.

### Flooding

Indicative SEPA maps show that the majority of the northern part of the site in the Kildean Village area is of 'medium risk and is likely to be susceptible to fluvial flooding in a 1:200 year event. Other remaining areas are identified as being at risk of surface water flood events. Detailed flood risk studies and assessments will be undertaken as the proposal is progressed.

### Traffic and Transport

There are numerous potential access points to a site of this size. The Three parks also offers the opportunity for a full new footpath network to be created incorporating the current core path. This would then link back into the city drawing more people to it. Initial ideas are that the South Kildean site would be accessed via two points from a new roundabout at the access point to the park and ride facility. The ambition of a landmark or anchor tourism/retail development could assist in creating a slip road for the M9 at Falleninch which is an aspiration in the adopted LDP.

### Conclusion

CCG would like to work in partnership with the Council to help deliver its City Development Framework. The housing proposed is considered effective.

### **Drop in Sessions**

- 0 – Would not support development on this site
- 2 – Unsure
- 3 – Would support development on this site

### **Stirling Council Response:**

Cycle Stirling's comments on this site are noted.

With regard to CCG's proposal to develop an extensive area of housing at this location, the Council remains of the view that this area is not suitable for development in landscape or visual terms because of its location within a key open area important for protecting the setting of Stirling Castle, the sweep of the carse to the base of the Castle crag and the setting of Craigforth crag. It is not accepted that this area has changed in character resulting in housing development being more acceptable. It is further considered that housing development here would be isolated from the city with no connections to other residential areas.

With regard to the site augmenting the LDP housing land supply, the proposed plan already identifies sufficient housing land to provide a generous supply of housing in line with SPP. There is therefore no need to release further land at this sensitive location.

CCG's proposal to provide a city park in line with the Council's emerging City Development Framework (CDF) are noted. However, the City Park concept is currently being pursued separately through the CDF funding bid. It is not considered appropriate or necessary at this time to allocate land on this sensitive site in order to fund the park. Development of the greenbelt at this location would be detrimental to its function to protect the identity and setting of Stirling. The Council is of the view that the City Park should form a gateway to the City, and not housing development at South Kildean.

This site is not identified for housing development in the proposed plan.

<b>Ref.</b>	80	<b>HILL O'DRIP (STR20)</b>	
<b>Representations by:</b>			
01039 – Cycle Stirling		SLDP_126 – Scottish Water	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
<p>Cycle Stirling (01039) note that the site is close to a strategic cycle link to Stirling and the western villages. Suggest that there is opportunity to improve pavements and crossing points for both cyclists and pedestrians between the Old Bridge and Dobbies.</p> <p>Also suggest that there is opportunity to extend the Park and Ride service to Dobbies.</p> <p>Scottish Water (SLDP_126) note that there is currently capacity for this development, although possible further investigation required on local network. Recommended developer contact Scottish Water as early as possible.</p>			
<b>Stirling Council Response:</b>			
<p>STR20 was the subject of application 10/00616/FUL which received planning permission on 7/11/2014. The suggestions by Cycle Stirling (01039) are noted, however these are not issues that are addressed by the approval. The consent does place conditions on the development requiring that the access is upgraded.</p> <p>Scottish Water (SLDP_126) comments are noted.</p>			

<b>Ref.</b>	81	<b>EAST OF CARBETH INN (SBL01)</b>	
<b>Representations by:</b>			
SLDP_102 – Strathblane Community Council		SLDP_1319 – W.M. Oswald	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
<p>W.M. Oswald (SLDP_1319) and Strathblane Community Council (SLDP_102) express support for the site not being identified as an option in the Main Issues Report.</p>			
<b>Drop in Sessions</b>			
12 – Would not support development on this site			
0 – Unsure			
0 – Would support development on this site			
<b>Stirling Council Response:</b>			
Responses noted. This site is not identified in the Proposed Plan.			

<b>Ref.</b>	82	<b>MUGDOCK NORTH</b>	
<b>MIR Ref.</b>	SBL02	<b>Officer:</b>	MM
<b>Representations by:</b>			
SLDP_102 – Strathblane Community Council		SLDP_1319 – W.M. Oswald	
		<b>Total No.</b>	2

<b>Summary of Comments:</b>
W.M. Oswald (SLDP_1319) and Strathblane Community Council (SLDP_102) express support for the site not being identified as an option in the Main Issues Report.
<b>Drop in Sessions</b> 12 – Would not support development on this site 0 – Unsure 0 – Would support development on this site
<b>Stirling Council Response:</b>
Responses noted. This site is not identified in the Proposed Plan.

<b>Ref.</b>	83	<b>MUGDOCK SOUTH</b>	
<b>MIR Ref.</b>	SBL03	<b>Officer:</b>	MM
<b>Representations by:</b>			
SLDP_102 – Strathblane Community Council		SLDP_1319 – W.M. Oswald	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
W.M. Oswald (SLDP_1319) and Strathblane Community Council (SLDP_102) express support for the site not being identified as an option in the Main Issues Report.			
<b>Drop in Sessions</b> 12 – Would not support development on this site 0 – Unsure 0 – Would support development on this site			
<b>Stirling Council Response:</b>			
Responses noted. This site is not identified in the Proposed Plan.			

<b>Ref.</b>	84	<b>TELECOMMUNICATIONS</b>	
<b>Representations by:</b>			
SLDP_54 - Mobile Operators Association		SLDP_188 – Scottish Government	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
Mobile Operators Association (SLDP_54) propose a policy for telecommunications as follows:  “Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.  Proposals for telecommunications development will be permitted provided that the following criteria are met:			

- (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;
- (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;
- (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.
- (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.

When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”

Scottish Government (SLDP\_188) refer to the expectation is that local development plans should provide some local context around the delivery of strengthened digital communications capacity and coverage across Scotland by setting out local roll out plans and confirm how the Proposed LDP will support the digital aspirations of the Council (i.e. as set out in its Strategic Infrastructure Plan).

(page 95 of the proposed East Ayrshire Local Development Plan provides an example of how could be covered in the Proposed LDP).

The Scottish Government also note the Plan should ensure that developers of new residential or business premises consider opportunities to install the necessary digital infrastructure as an integral part of their proposed development.

**Stirling Council Response:**

A new policy is included in the Proposed Plan applicable to the Installation of Communications Infrastructure as follows:

“Providers of communications equipment will require to demonstrate that the following options have been considered in the selection of sites and design of base stations:

- (i) Mast or site sharing
- (ii) Installation on buildings or other existing structures
- (iii) Concealing or disguising mast, antennas, equipment housing and cable runs using design and camouflage techniques where appropriate
- (iv) Installation of ground based masts

As part of any planning application for such developments, applicants will require to provide the following information:

- An explanation of how the proposed equipment fits into the wider network;
- A description of the siting options (primarily for new sites) and design options which satisfy operational requirements, alternatives considered, and the reasons for the chosen solution;
- Details of the design including height, materials and all components of the proposal;
- Details of any proposed landscaping and screen planting, where appropriate and;

- An assessment of the cumulative effects of the proposed development in combination with existing equipment in the area;
- An assessment of visual impact, if relevant.

Developments which deliver entirely new connectivity to an area will be particularly encouraged.

Should any communications installations become operationally redundant, the Council will require their immediate removal and the restoration of the site to its original condition.”

Furthermore, part (d) of Primary Policy 3: Provision on Infrastructure has been updated to require developers to install the necessary infrastructure to enable fibre-based high-speed broadband in new homes and business premises.

<b>Ref.</b>	85	<b>MINERALS</b>	
<b>Representations by:</b>			
SLDP_78 – Cambusbarrow Community Council		SLDP_175 – SEPA	
SLDP_110 – The Coal Authority		<b>Total No.</b>	3
<b>Summary of Comments:</b>			
Cambusbarrow Community Council (SLDP_78) have commented, in respect to the Review of Scottish Planning Policy (Appendix B of the Main Issues Report) and the current planning application for the reactivation of Murrayshall Quarry, as follows:			
<ul style="list-style-type: none"> <li>• Do not disagree with the action to map areas of workable mineral resources but note that substantial resources – both financial and (in-house) knowledge-based would be required to produce robust data and that the production of superficial data could be counterproductive to community environmental protection;</li> <li>• Agree will general criteria for mapping areas of workable mineral resources, availability etc. and particularly requirement for minerals;</li> <li>• Local authorities should not only consider workable mineral resources within the authority area but resources available to the market area but lying outwith the geographical boundary;</li> <li>• Issue of ‘over-supply’ should be considered, especially in relation to the proposed extraction of minerals not needed to meet the 10 year land-bank criterion. It should be explicitly stated in the LDP that this has to be considered;</li> <li>• In terms of any ‘criteria-based approach’, it is not clear what Stirling Council would adopt and in the absence of guidance the value of the consultation value is diminished. Communities would have to be consulted again on the criteria to be adopted in any revised LDP;</li> <li>• Economic development may be a factor that influences the significance attached to impacts upon specific environmental factors.</li> </ul>			

The Coal Authority (SLDP\_110) notes the LDP needs to address the following issues, as required by SPP:

- The definition of appropriate broad areas where surface coal extraction may be acceptable;
- The inclusion of appropriate development management policies to ensure that mineral resources are not needlessly sterilised – these should include criteria to encourage the prior extraction of surface coal resources where it is necessary for non-minerals development to take place within safeguarded areas;
- Ensuring that areas and sites identified/allocated for non-minerals development take account of surface coal resources and do not unnecessarily sterilise the resources within safeguarded areas;
- specific policies for energy minerals, including policies to allow coal extraction proposals to be considered on their merits and suitable restoration;
- Identify PEDL 133 area and set out a policy approach for hydrocarbon extraction;
- The inclusion of suitable policies to ensure that all development proposals within coalfield areas take account of any coal mining-related land stability and/or other public safety risks and, where necessary, incorporate suitable mitigation measures to address them.

SEPA (SLDP\_175) note that areas of search and policies relating to mineral workings should be consistent with SEPA guidance relating to air, water and soils ensuring that there are no significant negative impacts on such issues.

With regard to Primary Policy 11: Minerals and Other Extractive Industries, generally support the consideration of environmental impacts in points b) and d), however recommend that the word ‘natural heritage’ of the footnote in point c) is defined further to refer to ‘the environment’ (i.e. natural heritage and the environment) as we consider that in its current wording the definition of natural heritage could be misinterpreted and be restricted to matters related to SNH only i.e. designated sites under natural heritage legislation.

Also, state the development plan should require the submission of a restoration and aftercare plan. It is noted that PP11 refers to an extractive waste management plan and refer to planning of restorative work, however SEPA **recommend** changing this to state: “*Extractive waste management plans, including restoration and aftercare plans, will be required*”.

#### **Stirling Council Response:**

SPP states that LDPs should safeguard all workable mineral resources which are of economic or conservation value and ensure that these are not sterilised by other development and support the maintenance of a landbank of permitted reserves for construction aggregates of at least 10 years at all times in all market areas through the identification of areas of search, or alternatively, set out a criteria-based approach. Such an approach is likely to be appropriate where a sufficient landbank already exists or substantial unconstrained deposits are available.

The proposed plan – Primary Policy 11 – safeguards workable mineral resources – including coal – by stating development will not generally be supported if it sterilises, degrades or otherwise makes unavailable, workable mineral deposits and supports the extraction that contributes to the maintenance of at least a 10 year supply of permitted reserves of construction aggregates, subject to criteria specified in part (d).

Supplementary Guidance will be developed, setting out detailed criteria against which all proposals for the extraction of minerals will be assessed; defining the market area for aggregates, which may extend beyond the Council boundary; and to confirm the current position regarding supply and demand and whether a 10 year landbank exists.

In respect to surface coal extraction, the proposed plan does not identify areas where surface coal extraction may be acceptable as it is considered that the area east of Stirling and south of the Forth, where there may be reserves, is identified as highly constrained for environmental and social reasons and the Spatial Strategy recognises the eastern villages as a priority area for regeneration.

Primary Policy 11 also identifies the Petroleum Exploration and Development Licence (PEDL) area within the Plan area and sets out a policy for the exploration, appraisal and the development of wellhead and transmission infrastructure for unconventional oil and gas extraction (coal bed methane, shale gas and other forms of onshore oil and gas) should the current moratorium on unconventional oil and gas development end.

Primary Policy 11 has been updated require the submission of a restoration and aftercare plan.

<b>Ref.</b>	86	<b>SPATIAL STRATEGY</b>	
<b>Representations by:</b>			
SLDP_62 – East Dunbartonshire Council		01550 – Alistair Dickson	
SLDP_324 – University of Stirling		<b>Total No.</b>	3
<b>Summary of Comments:</b>			
<p>East Dunbartonshire Council (SLDP_62) welcomes the vision, spatial strategy and preferred options set out in the Stirling Main Issues Report. It is acknowledged and agreed that these will contribute towards development in the right places without compromising Stirling’s environment, and will provide a stronger framework for implementing Scottish Planning Policy.</p> <p>University of Stirling (SLDP_324) supports the identification of the University as a strategic development location in Table 1. Require it to be cross referenced to the 2012 Masterplan and to a specific policy dealing with the needs of the University.</p> <p>Alistair Dickson (01550) is broadly in agreement with the Spatial Strategy, however, considers it is not being applied equally through the rural area as not all rural villages are proposed to benefit from this strategy, including Deanston. Development as proposed in the MIR only involves new housing in Strathblane and Kippen. As a consequence, it is considered that the implementation of the Strategy is flawed. Furthermore it is considered that the Spatial Strategy is also too concentrated on the Core Area. Whilst this as a general approach is accepted, it also has to be recognised that Stirling has a large rural area. The current proposed allocation of 74 housing units over the next 10 years will do little to sustain rural villages. These village should be given flexibility to expand and accommodate development demand.</p>			
<b>Stirling Council Response:</b>			
Comments from East Dunbartonshire Council are noted.			
The Spatial Strategy does not specifically cross reference Masterplans/Development Frameworks etc. of which there are a number and as such it is not considered appropriate			

to refer to the University’s masterplan, particularly as it is not a Council document. In general terms, it is considered the Plan supports the aspirations of the University (see also Issue 100).

It is not accepted that the implementation of the Spatial Strategy, particularly in the Rural Villages Area, is flawed. The Spatial Strategy supports planned small-scale extensions to identified settlements in the Rural Villages Area, consistent with their size and role in the Settlement Hierarchy in order to help sustain local services and facilities. It is not the strategy’s approach for there to be development opportunities in every settlement; not all settlements require development to sustain local services and facilities, while in other cases, further development cannot be sustained. Furthermore, in the case of Deanston the adopted plan allocated land for the development of 60 houses which were developed 2010 – 2015. Additional development would not be appropriate at this time.

<b>Ref.</b>	87	<b>DEVELOPER CONTRIBUTIONS</b>	
<b>Representations by:</b>			
SLDP_188 – The Scottish Government		01553 - Dandara	
		<b>Total No.</b>	2
<b>Summary of Comments:</b>			
<p>SLDP_188 (The Scottish Government) In taking forward the Proposed Plan, the approach to developer contributions should accord with circular 3/2012 as well as circular 6/2013, paragraph 139 which sets out what should be in supplementary guidance and what should be in the plan itself.</p> <p>01553 (Dandara) of the view that consideration should be given to a review of Policy 3.3 relative to developer contributions and its associated Supplementary Guidance (SG) particularly SG16 Developer Contributions and SG06 Healthcare Facilities. There was significant objection to the policy in the course of preparing the current adopted 2014 LDP and whilst the policy and objections to it were considered at the Examination for this plan, the SG was not. The Council should therefore have taken the opportunity to reconsider the content of the SG and the policy formulated from it.</p> <p>Dandara notes that the SG makes reference to and generally adheres to circular 2/2012 Planning Obligations and Good Neighbour agreements. However, Dandara is concerned that the developer obligations being imposed by the Council are becoming a ‘roof tax’ on development. The circular advises that planning obligations have a limited but useful role to play in the development management process where they can be used to overcome obstacles to the grant of planning permission and that they should be agreed between parties involved; developers should not automatically be required to enter into a planning obligation.</p> <p>Dandara is of the view that it is wrong for the Council’s SG to state, <i>“to facilitate a planning application progressing to a favourable recommendation in a timeous manner, it is important that developers discuss levels of contributions with the Council at the earliest opportunity”</i>. This suggests that planning applications will be refused in the absence of agreement on the level of developer contributions regardless of the planning merits of the proposed development.</p> <p>Dandara is of the view that the Council retaining the monies for 7 years before being returned to the developer if unspent. This is not consistent with elsewhere in Scotland</p>			

where this time period is 5 years. There is no reason why a similar timescale cannot be adhered to in the Stirling Council area.

There is disagreement with the formulaic approach set out in Table 3 of the appendix to SG16. It can be good to know exact levels of contributions but the SG provides no detail or transparency as to how the costs per unit were arrived at but the costs take no account of individual sites and local circumstances. For example, the cost of a new build primary school would differ from the cost of an extension. It may also be more suitable to reconfigure the internal layout of a school to accommodate increased pupil numbers and again, the cost is likely to be significantly different.

Set contributions towards off-site improvements to the green network and open space provision are also unacceptable as such actual costs will vary from site to site.

Dandara is most concerned about the requirement for contributions towards the provision of healthcare facilities. Dandara Ltd. Consider the contributions to healthcare facilities are unacceptable. Many GP practices operate from privately owned facilities and it is inappropriate to expect the development industry to fund the extension of privately owned premises. Healthcare is funded by central government through taxation and differs significantly from other locally funded infrastructure such as roads and education. The reporter overlooked this fact during the examination for the 2014 LDP.

The SG on healthcare facilities is based upon an assessment of facilities in 2008, now 7 years out of date. In many instances these could have been put under pressure through natural growth in the population. Whilst the guidance states that the Council will only seek contributions where the additional pressure on existing facilities is a direct or cumulative result of new development, it goes on to advise that no capital investment to expand/provide new facilities is currently planned. Dandara has serious reservations about this given that the assessment of facilities was carried out in 2008. LDPs should be based on the most relevant and up to date information and as such, it is unacceptable to rely on assessments carried out in 2008.

The requirement to transfer land at nil cost for healthcare is not acceptable to the development industry. As highlighted previously, many GP practices operate from buildings owned by the Partners within the practice and by providing land free of charge, as well as contributions towards to new facilities, developers would effectively be subsidising individuals. This cannot be what was intended by policy therefore a robust review of policy and associated SG is required.

**Stirling Council Response:**

With regard to the Scottish Government's response, the Council can confirm that it will take circulars 3/2012 and 6/2013 as well as paragraph 139 of SPP into full account in the production of the Proposed Plan.

With regard to Dandara's concerns over developer contributions, the key purpose behind the quick review of the 2014 LDP was to ensure that the LDP identifies a generous supply of housing in line with SPP as well as update other matters such as SPP's requirement for planning authorities to incorporate a Spatial Framework for Wind Energy. It is not considered necessary at this time to carry out a full review of policy 3.3 or of the relevant associated Supplementary Guidance as the principles and content of these remain sound and valid. Minor amendments to the SG may however be made when it is being rolled forward to form part of the new plan.

The developer contributions being sought are not considered to be a notional roof tax as Dandara state; instead the amounts being sought per residential unit or per square metre

are there to provide certainty to developers. The amounts have been calculated in a transparent way which is set out in other Supplementary Guidance and are required as a direct result of new development. Whilst Circular 2/2013 states that planning obligations should be devised as an agreement between the developer and the Council, it is nevertheless the Council's responsibility to ensure that all necessary infrastructure necessary to support new development is either in place or that future provision has been made for it through a legal agreement. The Council would not be fulfilling its statutory duties if such provisions were not in place and following this logic, planning consent should not be granted in such circumstances. The Council is therefore fully justified in refusing a development which would fail to meet with infrastructure requirements.

With regard to the SG stating that unspent monies will generally be paid back in 7 years, there is no national policy or guidance which sets out a specific time period for this. 7 years is considered appropriate for Stirling Council because of the cumulative nature of some of the contributions. Certain contributions such as health and education require to be pooled from more than one development in order for them to be spent. This can result in delays as different sites will have different build out periods. Seven years is considered to be a short enough time period to allow multiple developments to make their respective contributions as well as giving the development industry some degree of comfort that their funds will not be held by the Council for an unreasonable length of time.

Dandara's opinion of the formulaic approach set out in SG16 is noted. However, the Council has put a great deal of effort into coming up with these formulas and is of the view that the methods of calculation are justified and sound.

The use of developer contributions to fund health care facilities is well established in Aberdeenshire and Aberdeen City Councils and in the examination for the 2014 LDP, the reporter stated that this is a reasonable approach to take and made no modifications to the policy in this regard. The Council is therefore of the view that this approach can be carried over to the LDP 2017 in full consultation with all relevant parties.

It is accepted that the assessment of healthcare facilities was carried out in 2008. However, there is no more recent comprehensive information available at this time.

The Council would reinforce the fact that its approach to developer contributions and healthcare provision is robust and commonly used elsewhere in Scotland and it is therefore considered appropriate to take this forward to the new plan.

<b>Ref.</b>	88	<b>EDUCATION</b>
<b>Representations by:</b>		
SLDP_178 - Sportscotland	SLDP_188 – The Scottish Government	
	<b>Total No.</b>	2
<b>Summary of Comments:</b>		
SLDP_188 (The Scottish Government) provided comment on the Education Provision Background Report which was published alongside the MIR. It is noted that Appendix A 'Capacity of Primary Schools' section 1.1 and Appendix B, 'Capacity of Secondary Schools' refer to the " <i>The Application of the 80% rule</i> ". It is pointed out that this is no longer applicable as the Education (Publication and Consultation etc) (Scotland) Regulations 1988 were replaced with the Schools (Consultation) (Scotland) Act 2010. There is not a comparable reference to 80% of capacity within the 2010 Act.		

Scottish Government Guidance on determining Primary School Capacity published on October 2014 can be found at: [www.gov.scot/Resource/0046/00461513.pdf](http://www.gov.scot/Resource/0046/00461513.pdf)

SLDP\_178 (SportsScotland) understands that Supplementary Guidance 'SG15 Education Provision' is to be updated and issued with the Proposed Plan for consultation. It would be useful to consider the need for improvement or provision of additional sports facilities at school sites to cater for planned expansions, and where these would encompass community use. SportsScotland has produced design guidance for school sports facilities, including anticipated levels of provision, and would be happy to speak with the Council to provide further guidance should this assist.

**Stirling Council Response:**

With regard to the Scottish Government's response, the Council notes that updated guidance relating to determining the capacity of schools has been produced and will take this on board in producing the Proposed Plan and supporting documents.

The Council also welcomes SportsScotland's design guidance for school sports facilities and will take this into account in the update of SG15.

SG15 will not be published alongside the proposed plan. It will instead be reviewed in late 2016/2017 and will be the subject of full public consultation.

<b>Ref.</b>	89	<b>EAST AND SOUTH OF ASHFIELD (ASH01)</b>	
<b>Representations by:</b>			
SLDP_1012 – Gillian Allison		01693 – Holly MacLean	
		<b>Total No.</b>	1
<b>Summary of Comments:</b>			
<p>Gillian Allison (SLDP_1012) Expresses support for the Options presented in the MIR which does not include ASH01 East and South of Ashfield. Would not like to see this site developed as it is in the Green belt.</p> <p>Holly MacLean (01693) Would support development on this site as it may help improve the surrounding area as well as the building area.</p> <p><b>School pupils</b> Overall, 3 would not support development on this site, 2 were unsure and 4 would support development on this site.</p> <p><b>Drop in Sessions</b> 4 – Would not support development on this site 0 – Unsure 0 – Would support development on this site</p>			
<b>Stirling Council Response:</b>			
Responses noted. This site is not identified in the Proposed Plan.			

<b>Ref.</b>	90	<b>FORMER RAPLOCH LOCAL OFFICE (STR19)</b>
<b>Representations by:</b>		
SLDP_126 – Scottish Water	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
Scottish Water (SLDP_126) note that there is currently capacity for this development, although possible further investigation required on local network. Recommended developer contact Scottish Water as early as possible.		
<b>Stirling Council Response:</b>		
Response noted. This site received planning permission on 20/11/2014.		

<b>Ref.</b>	91	<b>FORMER MINK FARM (STR21)</b>
<b>Representations by:</b>		
SLDP_126 – Scottish Water	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
Scottish Water (SLDP_126) Note that there is currently capacity for this development, although possible further investigation required on local network. Recommended developer contact Scottish Water as early as possible.		
<b>Stirling Council Response:</b>		
The response from Scottish Water is noted. This site received planning permission on 19/11/14.		

<b>Ref.</b>	92	<b>MAINS OF BOQUHAPPLE (THR01)</b>
<b>Representations by:</b>		
01405 – Norman Greer	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
Norman Greer (01405) Suggests that development of this site will provide a new defensible edge and entrance to the village.  The submission also notes that there will be provision for active travel by the creation of a new footpath along the road and the opportunity for a new footpath connecting the development to Back Yetts is being investigated. Private transport will also be improved by upgrading the existing access.		
<b>Stirling Council Response:</b>		
The response to the MIR is noted. However, new development would appear to 'jump' the existing village edge. Significant new development here is not supported by the Council and the site is therefore not identified in the Proposed Plan as a development site. However, conversion of existing buildings to residential use may be possible through the Housing in the Countryside policy. It is noted that an application has been received by the Council (ref: 15/00345/FUL)		

<b>Ref.</b>	93	<b>WESTERLEA, BRIDGE OF ALLAN</b>
<b>Representations by:</b>		
01367 – Persimmon Homes East Scotland	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
<p>Persimmon Homes East Scotland (01367) submit their site for consideration. They consider that their site is effective and should be allocated in the proposed plan.</p> <p>A variety of documents relating to the previous call for sites in 2010 have been resubmitted and include site location, indicative masterplan, the Council's site assessment and a landscape and visual impact assessment. These have been accompanied with an updated site deliverability statement. Consider that through the previous LDP process that there was support for development of the site. The submission concludes that the current Local Development Plan and previous local plans have failed to allocate any sizable housing sites in Bridge of Allan and sufficient housing sites across Stirling.</p> <p><u>Proposal</u>  Submit that the site is capable of accommodating approximately 50 units and would have a range of house types and sizes. Reflecting current LDP policy for 33% affordable housing in Bridge of Allan there would be approximately 16 affordable units on the site. No detailed masterplan has been prepared but state that this could be developed into a full masterplan. The masterplan would address other issues to ensure "best fit" with the existing setting. The site would be designed in accordance with Designing Streets. Consider that the site is effective and meets the test of effectiveness as set out in PAN 2/2010.</p> <p><u>Access</u>  Contend that the site is well located for public transport and that there is appropriate links.</p> <p><u>Flood risk</u>  Submission is accompanied by a Flood Risk Assessment that concludes that the higher eastern and lower western areas of the site lie out with the 1 in 200 year river floodplain. State that this is reflected in the masterplan for the site and that any further flood prevention methods will be agreed in detail with the Council and other stakeholders.</p> <p><u>Ground conditions</u>  Consider that there are no adverse ground conditions affecting development.</p> <p><u>Ecology</u>  Submission is accompanied by an Ecological Assessment that concludes that the site has limited nature conservation value and no evidence of protected species. The report also notes that development of the site should take account of the non-native invasive species on adjacent properties and recommends that any landscape strategy incorporates the planting of native hedgerows and trees.</p> <p><u>Greenbelt</u>  Consider that there is currently limited opportunity for development in Bridge of Allan. Accepts that Scottish Planning Policy seeks to direct development to brownfield sites but that greenfield sites are normally needed to meet housing needs. Consider this is an important consideration in Bridge of Allan as there is limited scope for brownfield development. Also of the opinion that the MIR does not make clear if the site would remain greenbelt in light of the proposal for development at Airthrey Kerse. Consider that it would</p>		

be inappropriate to leave the site as greenbelt as this would leave a parcel of greenbelt between 2 residential areas. Suggest that to do so would not meet Scottish Planning Policy criteria for greenbelt areas. Submission references the previous site assessment which noted that development of the site would be viewed as a step towards the disappearance of the greenbelt. Persimmon disagrees with this assessment in light of the inclusion of Airthrey Kerse in the options in the MIR.

#### Landscape and visual impact

Submission accompanied by a Landscape and Visual Impact Assessment that concludes that development of the site would have a largely constrained impact within the immediate vicinity of the site due to the screening from existing development. Consider that seen from wider viewpoints the site would be seen as a small and insignificant addition.

Furthermore suggest that the boundary of the site could be made more robust by the use of mitigation planting, possibly by reinforcing historic field boundaries, the regeneration of existing hedgerows and the introduction of appropriate planting to integrate the development into the wider landscape.

#### Bridge of Allan housing developments

Consider that current sites allocated in the area are mostly brownfield small scale windfall sites and only a limited number have shown any progress with development. Consider that Airthrey Kerse is a large development that is unlikely to come forward quickly, and that this should not be considered as counting towards new homes in Bridge of Allan.

#### **Stirling Council Response:**

This site was subject to a post MIR site assessment and consultation with Key Agencies. It is acknowledged that there are positive aspects in favour of developing this site. For example the site is in a marketable location, therefore it is likely the site would be able to contribute quickly to the land supply and is well located in terms of active travel networks and access to the city and wider road and rail networks. However, the site suffers from significant constraints that preclude its development.

As part of the aforementioned post MIR site assessment process, SEPA were consulted and confirmed that they do not support development of the site and requested that the site be removed from consideration and that they would object if this site was included in the Proposed Plan. Based on the information held by them they consider the site at significant risk of flooding from surface water, small and culverted watercourses and potentially groundwater. On this basis they consider avoidance the most sustainable option and recommend that the site is removed. SEPA do note that they would be willing to review their position if the site was included in the plan, supported by an FRA.

It is noted that the applicants submitted an FRA, carried out in 2012, indicating that the lower western area of the site is not suitable for development, however the eastern portion which sits higher would not be at risk. The remaining central section is shown to be within the flood plain but might be available for development subject to further study.

Access to the site would also prove problematic. Road access could only be taken from the private access road at Carsiag Cottages which leads on to Cornton Road, close to the Cornton Rail Crossing. The site assessment concludes that due to the possibility of vehicles turning right onto the private access road leading to other vehicles backing up onto the rail crossing, the development could not be supported on road safety grounds. Network Rail have longer term plans to review this crossing and replace the 'at grade' crossing with a bridge.

Persimmon also contend that the LDP fails to allocate sufficient housing in Bridge of Allan and across the Stirling area. The Council does not agree with that view. The Proposed

Plan allocates a range of site sizes across the Stirling area to meet the Housing Supply Target and the required level of generosity as set out in SPP 2014.

Summary

On balance, it is considered that it is not appropriate to identify this site for development in the Proposed Plan. Whilst the concerns of SEPA may likely be addressed by the findings of the FRA, this reduces the developable area of the site and the FRA also shows that there is further detailed work to consider the ability of the central section of the site to support development. This raises concerns in terms of site layout as the access from the site is from the west and may lead to a visually isolated housing development unrelated physically to the housing to the north. In either regard, the concerns raised in terms of access to the site are significant that the site cannot be supported on road safety grounds. At this time the Council remains unconvinced of the need for the release of this site and is not allocated for development in the Proposed Plan.

<b>Ref.</b>	94	<b>BLAIRESSAN, KILLEARN</b>
<b>Representations by:</b>		
01314 - Brenda Pell	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
01314 - Brenda Pell The site SC246 (i.e. housing allocation H102 Blaieressan) seems to be the appropriate location for some development but there is currently no notice of how soon development might be expected. More information will be welcome.		
<b>Stirling Council Response:</b>		
The PSLDP continues to identify the H102 Blaieressan allocation for housing. At the time of writing (May 2016) an established housing developer is progressing a scheme for 33 houses and an initial public consultation meeting took place at the end of March 2016.		

<b>Ref.</b>	95	<b>PIRNHALL (B07)</b>
<b>Representations by:</b>		
SLDP_269 – Moto Hospitality Ltd.	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
Moto Hospitality Ltd. (SLDP_269) confirm their intentions for the site, allocated as an Employment Opportunity in the LDP (B07), remain active and they are marketing the site as an immediate business opportunity. The site has planning permission (subject to signing of a s.75 agreement). Moto Hospitality Ltd. seek the retention of the employment allocation for the site at Pirnhall in the new Local Development Plan.		
<b>Stirling Council Response:</b>		
The site at Pirnhall (B07) remains as an employment allocation in the proposed plan.		

<b>Ref.</b>	96	<b>DRUMTIAN ROAD, KILLEARN</b>
<b>Representations by:</b>		
01479 – Land and Property Holdings Ltd.	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
<p>01479 – Land and Property Holdings Ltd.  For reasons set out in supporting information, comprising a written justification statement, civil engineering site assessment and location, context and site plans, it is considered appropriate to allocate the identified site for residential development, as an effective part of the housing land supply.</p> <p>i) Overall MIR approach to housing land supply is inadequate to meet the demand, but also continued reliance on large allocations should be supplemented by the identification and allocation of smaller sites which are more easily developed, and will cumulatively make a valuable contribution in meeting the housing lands supply target. There should be a “generous” rather than a “modest” approach to housing land supply. The site can be developed within the LDP 5-year period.</p> <p>ii) For Killearn the MIR only allows for the continued allocation of one site, being Blaressan, allocated in the present plan. Further allocation of appropriate smaller sites will ensure village's housing needs are met. From an agreed requirement for 56 houses, there remains a shortfall of 20. There is a requirement for further sites to be allocated just to meet the “fully justified” and “modest” on-going requirement for 50 units, via controlled small scale expansion of the village.</p> <p>iii) A site in Drumtian Road is an appropriate location for new housing development in Killearn, and can contribute to the shortfall discussed above. The 0.77ha site is a former quarry, located immediately north-west of the existing houses on the northern edge of this part of Killearn. It is in a mature woodland setting which would not be affected by the development. It is adjacent to land already allocated for housing development in the adopted LDP and is easily accessible to village amenities and services and a regular bus service. Detailed consideration against the MIR's site assessment criteria and supported by a civil engineering site assessment indicates no significant planning, environmental or infrastructure constraints.</p>		
<b>Stirling Council Response:</b>		
<p>This site was submitted in response to the MIR consultation and therefore not considered at the earlier 'call for sites' stage as a potential option for inclusion in the MIR. A site assessment has been carried out.</p> <p>The MIR states the underlying aims of the Spatial Strategy, as set out in the current adopted SLDP, were not being altered in the proposed plan. Having taken full account of all comments submitted in response to the MIR consultation, the Council remains of the view the Spatial Strategy's managed development approach for the Stirling Core Area and Stirling Rural Villages continues to comply with relevant national planning policies and guidance, by supporting sustainable economic growth and allocating land for development whilst also taking proper account of important environmental, cultural and infrastructure constraints that influence the location and scale of new development. In particular the housing land requirement set out in the LDP fully complies with the policy principle set out in Scottish Planning Policy to identify a generous supply of housing land across all tenures, maintaining at least a 5-year supply of effective housing land at all times.</p>		

Having taken account of the submitted supporting information, the findings of the site assessment and the current housing allocation H102 - Blairessan there therefore is currently no demonstrable need for the PSLDP to allocate any additional housing land in Killearn.

<b>Ref.</b>	97	<b>MARYHILL, KIPPEN</b>
<b>Representations by:</b>		
01508 – Alan and Val Beaton	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
<p>Aland and Val Beaton (01508) Request an additional site be allocated for development in the village. Submitted representation contends that the site can be developed for 4 units without any impact on capacity constraints at the local School.</p> <p>Submit additional information suggesting that the site would confirm with the Vision and Spatial Strategy of the LDP and will contribute to the identified shortfall in housing. Recognition that the site is within the Countryside Policy Boundary and the Local Landscape Area but contend that the site is visually contained and development would not be visually intrusive on the LLA or impede access.</p> <p>Submission contends that the site satisfies the requirements set out in the Call for Sites Site Assessment.</p>		
<b>Stirling Council Response:</b>		
<p>It is accepted that in terms of education, a 4 unit development on this site would not likely pose an issue for the local primary school, however early contact with the Education Authority is advised due to other planned development within the village.</p> <p>As the site is within the Countryside Policy Boundary it must be demonstrated to the Council that development is in line with Policy 2.10: Housing in the Countryside or that there is other material considerations that warrant the inclusion of the site within the settlement boundary. In the opinion of the Council neither of these have been demonstrated. The submission states that the site is in line with the LDP Vision and Spatial Strategy, and while there are elements where the Council accepts this is broadly true, the site specific considerations of this site do not lend the site for allocation in the LDP.</p> <p>The site is steeply sloping up and away from the road and the impact of development on the surrounding views into the area are not fully understood at this stage. The designation of the LLA in itself does not preclude development, however the development would be required to satisfy the requirements of Policy 9: Managing Landscape Change and Policy 9.1: Protecting Special Landscapes. From the submitted information, it is not clear that development would satisfy these policies.</p> <p>Additionally there are concerns that appropriate access to the site could be created. The site is currently accessed by a narrow single track road which is not currently adopted. No information on how safe and appropriate access could be formed was submitted other than the assertion that access to the site is available from the unadopted road adjacent to the site.</p>		

As the submission notes there is an identified shortfall in land available for housing. As part of the MIR, sites effectiveness is also a key consideration. It would not be beneficial to allocate development that is unlikely to come forward. The submission notes that the site is not in the control of, or under option to, a housebuilder. Nor is the site being marketed. This raises concerns over the sites effectiveness and ability to contribute to the housing shortfall.

Summary

Whilst it is accepted that the site broadly accords with the LDP Vision and Spatial Strategy and there would be little impact on education capacity, on balance it is not appropriate to allocate the site for development in the Proposed Plan at this time.

There are constraints concerning impact on the LLA and access that would require to be satisfactorily overcome.

<b>Ref.</b>	98	<b>WEST OF BURNSIDE, KIPPEN</b>
<b>Representations by:</b>		
SLDP_745 – James Wilson	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
James Wilson (SLDP_745) Submitted an additional site for consideration and requests the site be allocated for housing. The site comprises 2 fields to the west of the site KIP02 identified in the MIR options		
<b>Stirling Council Response:</b>		
The submission was not supported by any accompanying material setting out site density, access arrangements or a justification as to why, on planning grounds, the site should be identified.		
Whilst the number of units proposed is unclear, the Council is of the opinion that development of the 2 fields would represent a significant expansion of the village into the Local Landscape Area and there is not currently infrastructure capacity to support such expansion beyond development already identified.		
It is not accepted that identifying the submitted site for development would be appropriate at this time.		

<b>Ref.</b>	99	<b>DEANSTON FARM</b>
<b>Representations by:</b>		
01550 – Alistair Dickson	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
Alistair Dickson (01550) is promoting the development of a 4.2 ha site to the west of Deanston for residential development, adjacent to the CALA development off James Smith Road. The submission contests that:		
<ul style="list-style-type: none"> <li>▪ The site would form a logical extension to the existing residential development and to the settlement. Additional housing would provide the opportunity to provide a strong and robust settlement edge as the current boundary is poor and not well defined – the</li> </ul>		

community pitch extends into the countryside in an unsympathetic manner, creating visual intrusion at this location;

- It is located in the Countryside but is not covered by any environmental designations;
- Connections to the existing settlement are available through the land adjacent which has already been developed. Alternative access options may also be available;
- The proposal would represent a small-scale expansion of the settlement in line the Spatial Strategy and would deliver both market and affordable housing that will assist to sustain services and facilities in the village.

**Stirling Council Response:**

This site was submitted in response to the Main Issues Report and has been subject to a detailed site assessment.

The Council is of the view that site should not be allocated for housing development as, although development would form a logical extension to Deanston and could assist in creating a stronger settlement edge, the village has limited services and any further development would inevitably result in additional car trips as options for sustainable travel are limited. Development would be contrary to the spatial strategy set out in the proposed plan for the Rural Villages Area, which envisages small-scale expansion of existing settlements consistent with their size in order to sustain local services and facilities.

Furthermore, the Council has also identified sufficient housing land on alternative sites meaning that in terms of housing land supply, there is no need to identify this site for residential development in the proposed plan.

The site is not identified as a housing site in the proposed plan.

<b>Ref.</b>	100	<b>UNIVERSITY</b>
<b>Representations by:</b>		
SLDP_324 – University Of Stirling	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
<p>The University of Stirling (SLDP_324) suggests that the Council should include a specific policy in the Proposed Plan which sets out the University site as an allocation appropriate for a range of uses to support the activity and continued development of the University. This is to ensure a presumption in favour of development, subject to satisfying other LDP policies, for a range of uses including: Academic; Research; Business/Incubator/Innovation/Enterprise; Commercial; Sport; Student Accommodation; Hotel and Leisure; and Retail.</p> <p>The University requests that the policy should also make reference to the 2012 Stirling University Masterplan which provides the detail to support matters referred to in the University planning policy.</p>		
<b>Stirling Council Response:</b>		
<p>In response to the submission by the University of Stirling and a subsequent follow-up meeting, the Bridge of Allan Settlement Statement has been updated to read as follows:</p> <p>“The University of Stirling produced a Campus Masterplan in 2012 which sets an overarching vision, core themes and key projects, providing a framework for future development of the campus. This Plan supports development within the campus in accordance with this and subsequent masterplans and which protects, preserves and</p>		

enhances the Airthrey Estate, which is included in the Inventory of Gardens and Designed Landscapes (see Policy 7.8). At the University of Stirling Innovation Park, the Plan safeguards existing employment areas and identifies opportunities for future employment development”.

The Spatial Strategy identifies the University as a Strategic Development location and in it is considered that the general land use polices, safeguards and allocations already set out – in addition to the text noted above – supports the University in its future aspirations and that a specific policy in this regard is not required.

<b>Ref.</b>	101	<b>KEIR LOCAL LANDSCAPE AREA</b>
<b>Representations by:</b>		
01553 – Dandara	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
<p>Dandara (01533) note the MIR only considers a very specific matter relative to Policy 9.1. – Protecting Special Landscapes, however, contend that the opportunity should be taken to review landscape designations where there is pressure for development, with particular reference to that part of the Keir Local Landscape Area lying to the north and east of the A9.</p> <p>A Landscape &amp; Visual Impact Assessment submitted by Dandara in support of the Concept Plan for the DUN01 site fully considered that part of the local landscape area lying to the north of the A9 in the context of criteria set out in SPP. It concluded that the area under consideration does not have a high quality landscape and is not an “important setting” for outdoor recreation and tourism locally. It is stated it does not have “local landscape or nature conservation value” and as such, it does not comply with the SPP definition.</p> <p>Additionally, and in respect to its designation as part of the Keir designed landscape, the Landscape &amp; Visual Impact Assessment concluded that the area separated by the construction of the A9, on its own, has very limited work of art, historical, horticultural, arborocultural and silvicultural, architectural, scenic and nature conservation value (the six categories, which Historic Scotland use to classify the Inventory of Gardens and Designed Landscapes). It further advised that it would be reasonable to remove the eastern section from the overall designed landscape designation and that this would also justify its removal from the Local Landscape Area identified in the Local Development Plan.</p>		
<b>Stirling Council Response:</b>		
<p>This representation relates to the Keir Local Landscape Area and Garden and Designed Landscape, specifically, the inclusion of land north of the Keir roundabout, east of the A9 and west of the B8039 within these designations.</p> <p>At this location, the boundary of the Local Landscape Area, designated by Stirling Council, and the Designed Landscape, defined by Historic Environment Scotland (previously Historic Scotland) are contiguous. The review of existing sites on the Inventory of Gardens and Designed Landscapes and/or the removal of a site from the Inventory is in the remit of Historic Environment Scotland.</p> <p>While physically separated from the rest of the designed landscape by the A9, it remains a parkland landscape of high quality, with mature parkland trees and woodlands. Despite its separation, it is important in the context of the overall designed landscape.</p>		

SPP requires planning authorities to protect and, where appropriate, seek to enhance gardens and designed landscapes included in the Inventory of Gardens and Designed Landscapes and designed landscapes of regional and local importance. Inclusion within a LLA is one means of doing this.

SPP also states the purpose of identifying areas of local landscape value should be to safeguard and enhance the character and quality of a landscape which is important or particularly valued locally or regionally; or promote understanding and awareness of the distinctive character and special qualities of local landscapes; or safeguard and promote important local settings for outdoor recreation and tourism. In this context it is considered the land in question is important and valued locally, demonstrated, in part, by its designation as designed landscape.

The boundary of the Local Landscape Area remains unaltered in the proposed plan.

<b>Ref.</b>	103	<b>HEAT NETWORKS &amp; GREENHOUSE GAS REDUCTION</b>	
<b>Representations by:</b>			
SLDP_175 – SEPA		SLDP_682 - Scottish Renewables	
SLDP_188 – Scottish Government		<b>Total No.</b>	3
<b>Summary of Comments:</b>			
<p>SLDP_175 - SEPA            We recommend changing Primary Policy 4 as current wording does not meet the requirements of SPP in relation to heat networks and district heating. We do not consider the proposal outlined in Appendix B of the MIR sufficient to address these requirements. We recommend SPP requirements are addressed as part of this current LDP (LDP2) and not as part of LDP3 or as a Supplementary Guidance, as proposed in the MIR. We consider that the MIR approach would cause serious delays in meeting greenhouse gas reduction objectives and addressing fuel poverty issues.</p> <p>In addition we recommend that the policy reflect the latest guidance provided by the Scottish Government in the Heat Policy Statement: Towards Decarbonising. Overall we recommend a separate policy is developed to address these requirements in more detail and suggest using the equivalent policy of the Midlothian Council as an example.</p> <p>SLDP_188 - Scottish Government            We note from the MIR and monitoring statement that heat network opportunities mapping still needs to be done. Aware Stirling participating in the Heat Network Partnership Strategy Programme and should therefore have started preparing a heat strategy for your area. Expect the Proposed LDP to take full account of this strategy and to have supportive policies to aid its implementation. The policies should be complemented by a spatial diagram which identifies where heat networks, heat storage and energy centres exist or would be appropriate, in order to comply with paragraphs 158-160 of SPP. This is particularly relevant as NPF3 requires Scotland’s “cities to be exemplars of low carbon living and a focus for essential energy infrastructure...”</p> <p>New development should be future-proofed to ensure that connections to existing or planned heat networks are taken forward as soon as they are viable”. The Scottish</p>			

Government and their heat network partners would therefore welcome the opportunity to discuss your approach in more detail.

Raise concern that existing Primary Policy 4 does not reflect the emphasis placed on the topic by para 287 of SPP (2014). Suggest that the Proposed Plan should update Primary Policy 4 to reflect closer the SPP provision and to be clearer on the locational decisions which generate significant travel generating uses.

SLDP\_682 - Scottish Renewables

The MIR recognises heat mapping 'still needs to be done' (p18). However it does not appear it will be taken forward as an issue to be considered for this LDP.

More than half of the energy consumed in Scotland is in the form of heat, and heating also accounts for 50% of Scotland's total CO2 emissions. Paragraphs 158 and 160 of SPP sets out the requirements for LDP's in relation to heat, including:- using heat mapping to identify potential for co-locating developments; support the development of heat networks; identify networks, heat storage and energy centres; support safeguarding of piperuns, and encourage microgeneration and heat recovery technologies, where heat networks are not viable.

Given the importance of renewable and low carbon heat in helping to reach government targets, we do not understand why this MIR fails to meet any of the requirements set out above. We recommend that opportunities for heat are included in the main issues arising for this LDP.

**Stirling Council Response:**

In response to these comments and in recognition of emerging Scottish Government guidance set out in SPP, The Scottish Government's Heat Policy Statement (June 2015) and a Planning and Heat online advice sheet (October 2015), section B. Climate Change Adaptation and Mitigation of the PSLDP includes a new policy: Policy 4.3: Heat Generation. This supports the renewable generation of heat and provision for, and the development of, energy centres, local heat networks and heat stores. There is also a commitment to prepare supporting supplementary guidance on Heat Generation which include use of Scotland's Heat Map.

<b>Ref.</b>	104	<b>ELECTRIC VEHICLES</b>
<b>Representations by:</b>		
SLDP_188 – Scottish Government	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
Scottish Government (SLDP_188) have observed that the current LDP does not address electric vehicle provision, which is an Action of National Planning Framework 3 and an expectation of SPP paragraph 289. They state the Proposed LDP could therefore address the infrastructure requirements for electric vehicles.		
<b>Stirling Council Response:</b>		
Supplementary Guidance SG14: Ensuring a Choice of Access for New Developments acknowledges that electric vehicles will play an increasingly important role in the ability of the population to use motor vehicles as a means of transport and that the ability to use, and increase the use of, electric vehicle relies in part on sufficient charging points. SG14		

encourages the provision of charging points for employee and pool vehicles for commercial properties and in domestic properties for residents' vehicles.

Policy 3.1, which SG14 supports, has also been updated to refer to electric vehicles.

<b>Ref.</b>	105	<b>AREA 3, LAURENCROFT, RAPLOCH (H062)</b>
<b>Representations by:</b>		
SLDP_175 – SEPA	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
SEPA (SLDP_175) request removal of this site on flood risk grounds.		
<b>Stirling Council Response:</b>		
<p>The Council notes the response from SEPA and is amenable to the removal of the site for the Proposed Plan.</p> <p>H062 is identified in the Current LDP as a Period 2 (Post 2024) site. Housing land is assessed annually through the Housing Land Audit (HLA) and the 2015 HLA does not indicate a change in programming from the LDP. The site no longer features in the Raploch Masterplan and the Raploch URC are currently investigating other uses for the site.</p> <p>This site is not identified in the Proposed Plan.</p>		

<b>Ref.</b>	106	<b>GREEN NETWORK AND OPEN SPACE</b>
<b>Representations by:</b>		
SLDP_175 - SEPA	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
<p>SEPA (SLDP_175) generally support the wording of Policy 1.3 – Green Network and Open Space, including the commitment that financial contributions may be sought to ensure that green infrastructure is not diminished by development, as well as the clarification provided by the foot note as to the inclusion of the blue infrastructure in the green network.</p> <p>However, do not support wording in section 1.3 (b) which says: ‘Such proposals resulting in a net reduction of open space, including loss of connectivity or accessibility, should ensure that the remaining elements of the Green Network are enhanced and that alternative routes are provided or enabled’. Consider that this seems to allow for loss of spaces and loss of connectivity, trading off loss at one point with addition or enhancement elsewhere. Recommend changing the text to read: ‘Such proposals resulting in a net reduction of open space, including loss of connectivity or accessibility <i>would require to be assessed in the widest context to ensure that loss of connectivity is minimised</i>, should ensure that the remaining elements of the Green Network are enhanced and that alternative routes are provided or enabled’.</p>		
<b>Stirling Council Response:</b>		

The concerns raised by SEPA are acknowledged. The sentence highlighted by SEPA has been removed altogether.

The policy has been re-ordered to clarify that, first-and-foremost, there is a presumption against the loss of open space and, secondly, where open space is to be lost, adequate compensatory measures will be required to ensure that appropriate alternative provision is provided, the remaining elements of green infrastructure are enhanced, loss of any connectivity is minimised and that alternative routes are provided or enabled.

<b>Ref.</b>	107	<b>AIR QUALITY</b>
<b>Representations by:</b>		
SLDP_175 - SEPA	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
<p>SEPA (SLDP_175) require that either a new policy on air quality is included in the LDP or an addition to an existing policy (e.g. Primary Policy 1 – Placemaking) is made to cover air quality issues. The SEA ER however states that the significant environmental effects predicted in the assessment of the options outlined in the MIR include negative effects upon air quality and amenity arising from increase traffic resulting from development particularly within the core area and air quality remains an ongoing environmental problem (as confirmed in Stirling Council’s 2014 Air Quality Progress Report).</p> <p>SEPA’s guidance states that the LDP should have policy coverage to ensure that any proposed development which could have a detrimental impact on air quality, through exacerbation of existing air quality issues or introduction of new sources of pollution, provides appropriate mitigation measures which are agreed with the local authority.</p> <p>Recommend that good air quality is recognised as an important element of sustainable place making that contributes towards health and well-being and that revisions to Supplementary Guidance 1 – Placemaking consider air quality, including siting and design options that would improve local air quality.</p>		
<b>Stirling Council Response:</b>		
<p>Primary Policy 1 – Placemaking has been updated to make reference to air quality issues. An additional part has been added which states in order to achieve the Council’s placemaking objectives, development of all scales must:</p> <p>“Have minimal adverse impact on air quality. Air quality assessments and appropriate mitigation measures will be required for any proposed development which the Council considers may significantly impact upon air quality, either on its own or cumulatively”.</p>		

<b>Ref.</b>	108	<b>PROVISION OF INFRASTRUCTURE (Primary Policy 3)</b>
<b>Representations by:</b>		
SLDP_175 - SEPA	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
<p><u>Primary Policy 3 – Provision of Infrastructure</u> SEPA supports the general purpose of Primary Policy 3 but recommends that the following modification is made:</p>		

In paragraph e) change the wording to reference to the Green and Blue Network in order to meet with the objectives of the Water Framework Directive.

Policy 3.1 – Addressing the Travel Demands of New Development

SEPA generally supports this policy in delivering the objectives of the Climate Change Act 2009 and SPP (paras 46, 104, 270, 273) it is noted that SG 14 supports this policy. Note that SEPA recommends that the LDP includes a new policy on air quality as this is currently missing from the plan. It is recommended that this is included in Primary Policy 1.

Policy 3.2 Site Drainage

SEPA generally supports policy 3.2 in relation to both foul drainage and surface water drainage. Please note that the Sewers for Scotland is now at its 3<sup>rd</sup> edition. This is in line with SPP. There are, however, concerns about the distinction between point a) and b) made on the basis of private sewage with a threshold on 2000PE and require that in all cases the connection should be made to the public sewer where possible. Further discussion on this point at a post MIR meeting is needed. It is also recommended that the following is added to point b):-

- Surface water is controlled at source wherever possible through the use of permeable surfaces and green roofs
- Developments are designed to conserve water usage
- Opportunities are taken to retrofit SUDS wherever possible for developments that involve a change of use and/or redevelopment.

Policy 3.3 Developer Contributions

SEPA recommends that policy 3.3 (d) (iv) to be changed to Green/Blue corridors

**Stirling Council Response:**

The footnote at the end of Policy 1.3 is clear that the Green Network includes ‘blue’ infrastructure such as rivers and watercourses. As such it is not proposed to update Primary Policy 3 and Policy 3.3 to specifically refer to Blue Network/Corridors.

Point (b)(i) has been updated to state: “ Developments should be designed to conserve water usage and control surface water at source wherever possible. Opportunities to retrofit SuDS are encouraged”.

The first line of Policy 3.2 (a)(i) states “a connection to the public sewer will be required for all development within or close to urban areas (i.e. all settlements of greater than 2000 population equivalent) and other sewered areas”. As such, it is considered that, in effect, the policy requires connection to the public sewer network where possible.

Reference to Sewers for Scotland has been updated.

<b>Ref.</b>	109	<b>RESOURCE USE AND WASTE MANAGEMENT</b>	
<b>Representations by:</b>			
SLDP_175 - SEPA		<b>Total No.</b>	1
<b>Summary of Comments:</b>			
SEPA (SLDP_175) support Primary Policy 6 - Resource Use and Waste management as it addresses most of the issues required by SPP, paragraph 178 to 187 and it helps in meeting the objectives of the Zero Waste Plan, however, require a modification to more			

clearly reference Lower Polmaise as the principal waste management facility in the area and other waste management facilities on the spatial strategy map.

Also generally support Policy 6.1- Provision and safeguarding of waste management infrastructure, and in particular point 6.1(b) referring to the safeguarding of existing waste management sites, including safeguarding or protecting land for expansion surrounding existing waste facilities, to allow for growth without being prejudiced or restricted by adjoining land uses.

SEPA recommend:

- 'minimise the unnecessary transportation of waste by road and/or utilise access by rail or water' is added to 6.1 (iii) in order to minimise carbon emissions;
- the wording of 6.1 (iv) is changed from 'consider the potential' to 'enable the implementation of 'energy from waste' and/or reuse of waste heat (e.g. by preparing a heat plan)' in order that sites identified for energy from waste facilities are designed to enable links to be made to potential users of the heat and/or power generated at the site.

Reference is also made to paragraph 185 of SPP which states that LDPs should set out spatial strategies which make provision for new infrastructure, indicating clearly that it can generally be accommodated on land designated for employment, industrial or storage and distribution uses. It is suggested the wording of Policy 6.1(a)(ii) could be expanded to correlate with the SPP.

**Stirling Council Response:**

The footnote at the end of Policy 6.1 identifies Lower Polmaise as the principal waste management facility in the area and the site is indicated on the Fallin Proposals Map and the Key Diagram for the Core Area. A second Household Waste Recycling Centre operates within the plan area at Dunkeld Court, Balfron which has been identified on the Balfron Proposals Map. Other licenced wastement management infrastructure sites are also identified.

We note the comments regarding the transportation of waste by rail and water, however, as the Plan area does not have the infrastructure to facilitate transport by these modes, it is considered that simply stating development proposal for waste management infrastructure or facilities should minimise transport of waste from its source is sufficient.

We agree the wording of 6.1 (iv) should be changed from 'consider the potential' to 'enable' energy from waste.

The Stirling Local Development uses the term employment land/uses to encompass Class 4, 5 and 6 therefore it is considered that Part 6(a)(ii) does clearly indicate that new waste management infrastructure can be accommodated on land designated for employment, industrial or storage and distribution uses.

<b>Ref.</b>	110	<b>PRIMARY POLICY 10: FORESTS, WOODLANDS AND TREES</b>	
<b>Representations by:</b>			
SLDP_175 – Scottish Environment Protection Agency		<b>Total No.</b>	1
<b>Summary of Comments:</b>			

Criteria (a)(ii) of the adopted LDP's Primary Policy 10 – Forests, Woodlands and Trees states the Stirling and Clackmannanshire Forestry and Woodland Strategy will *'encourage sustainable forestry that delivers a range of economic, social and environmental benefits, including the mitigation of climate change and ecological adaptation'*. We have concerns regarding the use of forestry as a climate change mitigation tool. Evidence suggests forestry operations can play a part in Natural Flood Management but current evidence base may not provide sufficient certainty at this time. Consequently suggest policy wording be modified to read *'including the potential mitigation of climate change'*.

In relation to criteria (a)(iii) we recommend rewording point to read: *'set out the local circumstances and factors (including environmental factors related to soil, water, flood risk, waste) in the assessment of planting and felling proposals.'*

In relation to Supplementary Guidance 30 - Stirling and Clackmannanshire Forestry and Woodland Strategy we have concerns about the reference to flood risk and therefore require modifications to this SG as follows:-

i) Removal of the text in page 13 relating to energy forests, i.e.: *'This type of planting can also be used in flood risk areas or areas of poor quality land, acting to stabilise soils and ameliorate pollution'*. This is commercial woodland with crops requiring frequent harvesting. We do not consider this activity to be compatible with being grown within flood risk areas or on unstable soils.

ii) In relation to text on Natural Flood Risk Management (p8) recommend changing the word 'can' into 'may'. Also recommend removing text on page 18 relating to Indicative Flood Risk. This is because the SEPA Flood Map identifies areas of flood risk and it is a misuse of it to suggest that it can be used to identify areas suitable for riparian woodland. We would not be supportive of riparian woodland if we thought that it would add to the woody debris that could block or partially block culverts and bridges that might lead to an increased risk of flooding to properties and impact upon human health.

**Stirling Council Response:**

Minor changes have been made to the wording of Primary Policy 10: Forests, Woodlands and Trees in the PSLDP, in line with SEPA's comments. It is not currently proposed to review the recently adopted Supplementary Guidance 30 - Stirling and Clackmannanshire Forestry and Woodland Strategy. It will, however, required to be consulted upon again in order to form part of the new LDP. This is likely to take place in 2017.

<b>Ref.</b>	111	<b>PRIMARY POLICY 14: SOIL CONSERVATION AND AGRICULTURAL LAND</b>	
<b>Representations by:</b>			
SLDP_175 – Scottish Environment Protection Agency		<b>Total No.</b>	1
<b>Summary of Comments:</b>			
In relation to Primary Policy 14 - Soil Conservation and Agricultural Land we generally support Primary Policy 14 as it recognises the principles set out in the Scottish Soils Framework. However we consider the scope of criteria (a) should be expanded and wording modified from <i>'consider means of minimising impact on soil resources'</i> to <i>'consider means to protect and enhance soils'</i>			

We also recommend several additions to be consistent with Planning Advice Note 33 Development of Contaminated Land and other national legislation and guidance, particularly in relation to contaminated land.

A policy or supplementary guidance should ensure the sustainable use of soils during the development and operation of sites and a commitment to minimise soil sealing. This could be supported by reference to the DEFRA good practice on construction sites document.

**Stirling Council Response:**

Where appropriate minor changes have been made to the wording of Primary Policy 14 - Soil Conservation and Agricultural Land in the PSLDP, in line with SEPA's comments.

<b>Ref.</b>	112	<b>PRIMARY POLICY 13: THE WATER ENVIRONMENT</b>	
<b>Representations by:</b>			
SLDP_175 – Scottish Environment Protection Agency		<b>Total No.</b>	1
<b>Summary of Comments:</b>			
<p>Generally support Primary Policy 13 - The Water Environment. Consider the Council's support for the Water Framework Directive's "enhance" objective should be strengthened by modifying policy wording. Instead of '<i>All development must minimise and mitigate any potential impacts on the water environment</i>', we suggest the following wording:- '<i>All development must enhance and protect, by minimising and mitigating any potential impacts, the physical, chemical and biological quality of the water environment (all rivers, lochs, streams, groundwater, estuaries, wetlands), or 'Ensuring that new developments protect, and where possible deliver improvements to water bodies (rivers, streams, lochs, groundwater, estuaries, and wetlands). Improvements can include the re-naturalisation of channels, removal of culverts and barriers to fish passage, all of which must include consideration of potential flood risk aspects</i>'.</p> <p>This should be reflected in the reference to Supplementary Guidance 34 - The Water Environment where, in addition to protecting the water environment, the planning system has a role in enhancing the water environment.</p>			
<b>Stirling Council Response:</b>			
Minor changes have been made to the wording of Primary Policy 13 - The Water Environment in the PSLDP, in line with SEPA's comments.			

<b>Ref.</b>	113	<b>SUPPLEMENTARY GUIDANCE</b>	
<b>Representations by:</b>			
SLDP_175 - SEPA		<b>Total No.</b>	1
<b>Summary of Comments:</b>			
<p>SEPA have provided comments on a number of the adopted Supplementary Guidance documents as follows:</p> <p><b>SG01 – Placemaking</b></p>			

Note from section 7 of the MIR that the Council is intending to change SG1- Placemaking to reflect SPP and other government guidance, however are unclear on the reasons for removing the reference to Designing Places.

As a result of new guidance have requested to strengthen Primary Policy 1 to consider more explicitly air quality issues and would expect the SG to be revised and strengthened accordingly. Recommend, therefore, that the revised SG considers air quality in more detail, including siting and design options that would improve local air quality. Examples of such options are incorporation of green infrastructure, setting buildings back from pavement edges, varied building height and short block lengths.

Recommend changing the reference in point 5.3.5 to blue network as well as green network.

### **SG02 – Green Network**

Note that the Council is not intending to revise SG02 as its content and purpose are still valid, however an update to make reference to NPF3 (rather than NPF2) may be required but recommend that the SG is changed to make more explicit the links with blue network and give more consideration to the protection and enhancement of the water environment (including the enhancement of riparian habitat).

Also recommend that the Council considers the protection and enhancement of soil and soil functions (see new SEPA topic guidance on soil for more details).

### **SG03 – Green Belts**

Agree that changes may be required to reflect the allocation of new housing development in the PP.

### **SG 10 – Housing in the Countryside and Design Guide**

Support the intention to change current SG following the outcome of reviewing Policy 2.10 Main Issue 8). Furthermore note that the policy references in the design guide are out of date as it refers to the 2009 policy.

### **SG16 – Developer Contributions**

Note and agree that no changes are proposed to this SG as its contents and purpose are still valid.

### **SG 17 – Low and Zero Carbon Developments**

Agree with the Council decision to review this Guidance depending on the outcome of reviewing Policy 4.1.

### **SG 18 – Planning and Flood Risk Management**

Support that SG will be updated to reflect the requirements of SPP in relation to natural flood management and clarification within the SG that some areas outwith PVA will be at risk of flooding.

The weblink in Section 3.5 should be updated to:

[www.sepa.org.uk/environment/water/flooding/flood-risk-management/national-flood-risk-assessment/](http://www.sepa.org.uk/environment/water/flooding/flood-risk-management/national-flood-risk-assessment/)

Reference to 'Scottish Planning Policy (Feb 2010)' in Section 5.1 should be modified to 'Scottish Planning Policy (2014)' and recommend that the quote is updated to reflect the current wording in SPP (paragraph 256) from 'Development which would have a significant probability of being affected by flooding or would increase the probability of flooding elsewhere should not be permitted' to 'development which would have a

significant probability of being affected by flooding or would increase the probability of flooding elsewhere.'

Recommend that the wording in the second paragraph of Section 5.1 is updated to reflect the current wording with SPP (paragraph 255) and include the probability of flooding from reservoirs and drainage systems. From 'coastal, fluvial (water course), pluvial (surface water), groundwater, sewers and blocked culverts' to 'coastal, water course (fluvial), surface water (pluvial), groundwater, reservoirs and drainage systems (sewers and culverts), taking account of the predicted effects of climate change'.

Require that any reference to the 'SEPA Indicative River and Coastal Flood Map (Scotland)' is updated and reference made to the 'SEPA Flood Maps' and any weblinks updated to [www.sepa.org.uk/environment/water/flooding/flood-maps/](http://www.sepa.org.uk/environment/water/flooding/flood-maps/).

Recommend that the whole of Section 5.2 should be updated to reflect the current advice within Scottish Planning Policy.

Require that Section 5.2 (v) is updated to refer to The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR) and the weblink in Section 5.2(vi) updated to [www.sepa.org.uk/regulations/water/](http://www.sepa.org.uk/regulations/water/)

Require that the wording of Section 5.3 is amended as Planning Advice Note 69 has been superseded with Online Planning Advice on Flood Risk.

The weblink in Section 7.3 is required to be updated to:  
[www.sepa.org.uk/environment/land/planning/advice-for-developers/](http://www.sepa.org.uk/environment/land/planning/advice-for-developers/)

### **SG19 – Waste management- requirements for development sites**

5.27 We note from Section 7 that contributions are being sought via planning conditions and that the Council considers the content and purpose of SG19 still valid. We agree with this approach.

### **SG 30 – Forest and woodland strategy**

Have concerns about the references made to flood risk in this SG and therefore require modifications to this SG as follows:

Removal of the paragraph in page 13: '*This type of planting can also be used in flood risk areas or areas of poor quality land, acting to stabilise soils and ameliorate pollution*'. This is commercial woodland with crops requiring frequent harvesting. We do not consider this activity to be compatible with being grown within flood risk areas or on unstable soils. We would wish to discuss with the Council the use of energy forest in the context of flood risk, land stabilisation and pollution.

Recommend changing the word can into may: *Natural Flood Risk Management - Restoration and enhancement of natural features and characteristics of a landscape may play a role in managing the sources and pathways of floodwaters. Woodland planting may provide an opportunity to manage downstream flood risk via land use change in upland areas, for example through a combination of reduced stocking densities, blocking of drains and creation of upland woodlands. (see page 8)*

Recommend removing the following section: *Indicative Flood Risk Map – highlighting the 'area of search' for new flood plain and riparian woodland to contribute to climate change adaptation. (See page 14)* because the SEPA Flood Map identifies areas of flood risk and it is a misuse of it to suggest that it can be used to identify areas suitable for riparian woodland. SEPA would not be supportive of riparian woodland if we thought that it would

add to the woody debris that could block or partially block culverts and bridges that might lead to an increased risk of flooding to properties and impact upon human health.

**SG 33 – Wind Energy Development**

SEPA commented on the draft SG33 earlier in the year (our ref: PCS/140136, 3 July 2015). Expressed concerns with regards the lack of information included within the sections relating to carbon rich soils and water environment and stated that if the coverage of these issues was not expanded they would consider objecting to the guidance at subsequent formal consultation periods in the LDP process. Also made comments in relation to forestry and waste.

Recommend preparing another SG or expanding this one to cover other forms of renewable energy in addition to wind energy to consider in more detail the implications of the location and siting of different technologies on issues that relate to SEPA interests such as soils, water environment, waste and heat networks.

**SG34 – The Water Environment**

Agree that the content and purpose of SG34 remains valid but consider some additions are required to conform with the current guidance therefore recommend that the SG34 (and/or PP13) is modified to refer to the following:

- In addition to protecting the water environment, the planning system has a role in enhancing the water environment.
- Development proposals will be assessed within the context of the wider blue/green network. We note that reference is made in LDP1 to the green network including blue network. We recommend that the wording is changed in the LDP2 policy to make this clearer upfront.
- Siting and design of the development is informed by the natural flow paths of water through the site.
- Development proposal identify and promote the protection of Groundwater Dependent Terrestrial Ecosystems (GWDTE). GWDTE are specifically protected under the Water Framework Directive and are sensitive receptors to the pressures that are potentially caused by development. The suggested modification to the policy to include specific reference to GWDTE will ensure the Council accords with its duties to protect and improve the water (including groundwater) environment.
- Development proposal reflect best practice guidance in construction, minimising the impact of development on the water environment in the first instance and applying all appropriate mitigation measures to the satisfaction of Stirling Council and SEPA. This will include the application of pollution prevention measures relating to discharges, leachates and disturbance of contaminated land.

**Stirling Council Response:**

SEPA’s comments on the suite of Supplementary Guidance are noted. SG will not be published alongside the Proposed Plan but will be reviewed subsequent to this and will be adopted in tandem with the LDP.

In addition to formally consulting with SEPA, the Council will seek to involve SEPA in the preparation of the revised SG where issues relating to SEPA’s interests arise.

<b>Ref.</b>	114	<b>HILL OF DRIP (EMPLOYMENT ALLOCATION)</b>
<b>Representations by:</b>		
SLDP_327 – Graham’s The Family Dairy	<b>Total No.</b>	1

**Summary of Comments:**

Graham's The Family Dairy (SLDP\_327) seek the allocation of a 35 acre site at the Hill of Drip as an employment area for bespoke food and drink related uses (Classes 4, 5 & 6) to support a proposed dairy facility comprising production, logistics, product research and tourism. The site is promoted as an ideal location due to its accessibility to the trunk road network, infrastructure and agricultural land. Development would support 500 jobs and create a further 400 plus 50 apprenticeships, creating a combined GVA with the Airthrey Kerse housing development of £36m per annum.

**Stirling Council Response:**

The greenfield site at Hill of Drip proposed for development (Class 4, 5 and 6) is located west of the M9 and thus within the Rural Villages Area, albeit close to the Prudential, Garden Centre and Stirling Agricultural Centre.

The Proposed Plan identifies over 77ha of land for employment use within the Plan area, including 12ha close to the Hill of Drip site at Kildean. No justification has been provided as to why further land is required for employment use or for the release of a greenfield site when planning policy favours the re-use of previously developed, brownfield sites.

It is not considered there is a requirement to identify further employment land and therefore the site at Hill of Drip is not identified as an employment site in the proposed plan and is retained within the Countryside.

<b>Ref.</b>	115	<b>CLIMATE CHANGE ADAPTATION AND MITIGATION</b>
<b>Representations by:</b>		
SLDP_682 - Scottish Renewables	<b>Total No.</b>	1
<b>Summary of Comments:</b>		
<p>The Adopted Local Development Plan sets out 4 themes that underpin the policies of the plan, one of which relates to climate change adaptation and mitigation. While we agree with the statements made it fails to recognise the role of renewable energy which is one the best tools we have in mitigating climate change, and one that the Scottish Government has embraced as a priority, driven by its 2020 renewables targets and national indicator on renewable electricity. We recommend that this section is reworded to include a revised policy on climate change which recognises the role that renewable energy developments can play.</p>		
<b>Stirling Council Response:</b>		
<p>Criteria (c) in the Overarching Policy has been modified to state: <i>(c) Appropriate measures for mitigation of and adaptation to climate change which seek to ensure an area's full potential for electricity and heat from renewable sources is achieved.</i> Additional commentary has also been added to the opening text to section B. Climate Change Adaptation and Mitigation drawing attention to The Scottish Government's Heat Policy Statement (June 2015) and the three specific objectives of the Heat Hierarchy, i.e. reducing the need for heat, supplying heat efficiently and at least cost to consumers; and using renewable and low carbon heat.</p>		

## Further Information

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