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<th>Clackmannanshire Heritage Trust</th>
<th>Sauchie Tower/Howetown</th>
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<td>1</td>
<td>Proposed new mixed development site comprising 1.3 ha of brownfield land 100m north of Sauchie Tower.</td>
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Site comprises a redundant mine waste bing, former minehead buildings and self-seeded woodland.

Surrounding land uses include housing to the north and west, restored agricultural land/SSPCA enclosures to the east and the woodland setting of Sauchie Tower to south.

Site ownership is split between Clackmannanshire Heritage Trust and Clackmannanshire Council.

Proposed use is for a mix of heritage, tourism and housing, all related to, or to facilitate the restoration and future management of Sauchie Tower for opening to the public, and to serve the wider heritage interests of the county.

A market housing element for sale is intended to raise working capital for investment in further stages of the project. Numbers and densities etc. will be dependent on market conditions to be researched closer to the development stage, and to make an appropriate fit with the other components.

To also include tourist lettable accommodation to provide income to help support future running costs of Sauchie Tower and CHT. Numbers and footprints will be dependent on market conditions and the capital investment available from the associated housing development.

CHT has a longer term aspiration to form a Heritage hub serving the whole county; a building offering (1) interpretation of Sauchie Tower; (2) a meeting/lecture/conference venue for heritage organisations, specific projects or wider interests; (3) potentially a storage/display/exhibition facility (possibly including parts of the Council's Heritage Collection for which CHT is expected to take a management role).

The Council controls a clawback clause in CHT's title for the southern portion of the site requiring 50% of any development profits to be paid to them. The project will only be able to proceed with Council support including the waiving or deferral of this clawback, which CHT will seek in the broader public interest of the overall scheme. The Council's title to the northern half of the site includes restrictions on any building operations close to the former mine shafts, and all proposals are subject to approval by the successors of the NCB.

Potential ground contamination from mine waste not yet investigated. Advice received is that mine waste of this type and age is not likely to contain significant contaminants, but this can only be
determined by sampling/testing by an appropriate specialist. If certified inert, options for removal the material will be examined and/or re-shaping of the material on the site undertaken to produce significant improvements to the site’s landscape quality and its capacity for biodiversity, all subject to SEPA approval.

The purpose of this scheme is to provide the nearby Sauchie Tower - a Scheduled Monument - with a secure and viable future. For several years progress on the restoration of Sauchie Tower has been prevented by the lack of suitable funding. From its experience approaching the problem in different ways CHT sees little prospect of improvements to the funding environment for historic buildings in Scotland in the foreseeable future, and that any progress can probably only be made through its own efforts to raise funds through a development project of this sort.

The project will not be able to proceed if Developer Contributions are required.

Potential for on site energy generation is considerable - to be explored. In other roles the CHT trustees have extensive experience of renewable energy projects including hydro-electric generation, wood chip, pellet, deep- and surface ground, and air-source heating systems, for individual building and district applications, and they will be interested to examine how such systems can be applied here.

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<th>2</th>
<th>Cullross Ltd.</th>
<th>Solsgirth</th>
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<td>Support the continued inclusion of sites H51 and B21, Solsgirth, in the LDP.</td>
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Own the former Longannet Minehead site at Solsgirth and would want to see the sites stay in the LDP zoned as residential and other uses.

Sites are 5.7ha (H51) and 4.7ha (B21), previously part of the former Longannet minehead site, now fully remediated.

Surrounding land uses are farmland and wooded areas.

The sites are in the sole ownership of Cullross and have been openly marketed since around April 2017. It is hoped that the sites will be sold to a private sector developer.

The proposed use on site H51 would be around 50 homes which are likely to be detached and for private sale with affordable housing provision on site to meet policy requirements. Currently only residential accommodation is being considered but the flexibility to incorporate some mixed use (retail/leisure) on the site would be preferred.

The proposed use on site B21 is yet to be finalised with options appraisals currently being prepared. These include leisure/tourism/residential mix or large scale solar arrays.

A full SI and remediation strategy was submitted to Clackmannanshire Council and remediation works are now understood to be complete. DIA completed. Private drainage on site is proposed via a reedbed system (partially installed) although Drainage Impact Assessment required.
There is a burn running along the western edge of the site that is identified on the SEPA flood map as a potential flood risk.

It is understood developer contributions will be required to upgrade of B913, provision of a pathway to A977, potential for Education contribution.

On site energy generation and/or district heating has not been investigated but there is certainly the opportunity to generate electricity on such a large scale residential project, it would depend on the viability of incorporating such systems.

| 3 | Miller Homes Ltd. | Alloa West |

Propose a residential led mixed-use scheme with approximately 300 housing units on a 53.48 hectare greenfield site to the west of Alloa.

Site is currently in agricultural use and is allocated as employment land in the existing LDP under Policy EP1.

Surrounding land uses include employment, educational and farmland, with the River Forth to the south.

The site is currently under the ownership of a single family who have negotiated a legal agreement with Miller Homes to promote the site for residential development either in whole or in part as part of a mixed use development. Due to commercial confidentiality, details of financing cannot be provided at this stage.

It is anticipated that 300 units would be developed on approximately half (27 hectares) of the site. These would be of mixed stock and include houses and flats and would be a variety of 1, 2 and 3 bedroom homes. As per Clackmannanshire Planning Policy approximately 25% of these would be affordable. Details of the mixed use element of the scheme have not yet been finalised but it is envisaged that this would consist of commercial and employment uses.

As part of this Call for sites submission a series of supporting statements have been prepared including a Land Use Study, Housing Land Study and Employment Land Study.
Proposed new residential development site comprising 0.785ha of land north of the A977 at Forestmill.

The site previously comprised the land attached to and surrounding the former Zetland Cottage. The remains of the cottage were removed in the 1980’s. The land has not been used for any other defined purpose since then but is currently used for intermittent grazing. The site may be categorised as greenfield, depending upon definitions, but the most recent active use was residential.

Surrounding land uses are principally housing and forestry. Some adjacent commercial planting has recently been felled.

The proposed use is housing. There is no practicable opportunity for mixed use development. In that respect, the only business in the village (Loganlea Coffee Shop) has been closed for approximately three years. The proposal represents a simple, logical and sustainable extension of the cluster of housing that currently defines the existing village.

Around 8 – 10 detached or semi-detached private houses is envisaged, all served off a single public access road. This will be general needs housing. A subsequent planning application will address council policy guidance on affordable housing.

The site is not allocated or identified for development in the adopted local development plan. This call for the site to be allocated provides for the proposed re-alignment of the Forestmill settlement boundary to include this and adjacent properties on the north-west side of the A977 within the village boundary.

The site is outwith any area identified as being at risk of flooding on the SEPA flood maps. However, there is land in close proximity to the site that appears to be identified as being at risk from flooding from the Black Devon River. A desktop Flood Risk Assessment would be produced for a planning application as a proportionate response to these circumstances. [N.B. The northern part of the site appears to lie within an area identified as being at medium risk from a 1 in 200 year flood event]
Support the continued inclusion of residential development site H28 in the LDP.

Premier Property’s interest extends to 2.7ha of the site, outlined pink above, which is agricultural land with housing and agricultural land adjacent. The remainder of the site is owned by James Logan of Hillend Farm.

2 previous applications covering the whole site were withdrawn when a legal issue arose concerning ownership. This matter has now been resolved.

The site has been very fully investigated, including; intrusive mineral investigation, railway noise acoustic study, drainage study and a design produced for a roundabout on the A907.

Although the whole site has an indicative capacity of 55 units, it is envisaged the Premier Property’s part of the site could accommodate 20 units.

Support the continued inclusion of the Dollar Settlement Expansion Proposal H47.

Mrs K Stewart/Dollar Academy’s interest extends to 22.67ha, or thereby, outlined red in the plan above, and includes some land outwith the current LDP Proposal, highlighted in blue hatching on the plan above. Dollar Academy own 3.8ha or thereby (Newfield portion of site south of Strathdevon School) and Dollarfield (Mrs K Stewart) 18.87ha or thereby.

The site is being promoted by the landowners at this time. Approaches have been received by various national house builders interested in developing the site or parts thereof. Land sales will fund development of the residential and commercial elements of the site and the infrastructure necessary to support that. Dollar Academy is in the process of identifying funding sources and packages to deliver the sports academy proposed. These matters can be further detailed as part of the forthcoming planning application process.
The blue hatched land to the south of the site (east of Devon Road) is outwith the current allocation but is proposed for sports provision as part of the wider sports academy proposals for the site. It is suggested that this is an acceptable reversible use of Greenbelt land and will enable the full delivery of a national quality sports academy within the site.

The land is currently greenfield and in agricultural use. To the north lies the southern, predominantly residential edge of Dollar, including Strathdevon Primary School, Dollar Health Centre and the Library/Community Centre. To the south and east lies agricultural land and to the west, agricultural land and residential development at Lower Mains.

Proposals are for a mixed use development including residential, sports facility, commercial uses, landscaping, access arrangements and associated uses in line with the current Local Development Plan allocation and Proposal of Application Notice.

There have been numerous meetings and discussions with Council planning officials since before Local Development Plan Adoption in 2015 in respect of the site uses, boundaries and delivery timescales. The landowners are keen to work proactively with the Council to deliver a development that meets the requirements of the Local Development Plan in full on the landholding in question.

A Proposal of Application Notice and Environmental Impact Assessment Screening Opinion have been submitted to, and agreed with, the Council for the development as proposed on the land in question. It is intended that an application for planning permission in principle will be submitted in early 2018 with matters specified in conditions applications thereafter and a site start with occupations in 2020. It is anticipated that the site will be fully built out by 2025, see programme below:

- 2018 – planning permission in principle application submitted/granted;
- 2019 – matters specified in conditions applications submitted and granted
- 2020 – site start and year one completions
- 2020-2025 - site completions ongoing
- 2025 – site complete

It is anticipated that the mix of uses proposed on the site will allow sufficient land to deliver between 200 and 240 dwellings of a full range of types (cottage flats, terraces, semi- and detached dwellings) in a range of market and affordable housing tenures. Affordable housing provision will be delivered in line with current Council requirements at 25% of the overall number of dwellings for the site. Final housing numbers will be clarified through the masterplan process that will be undertaken as part of the forthcoming planning application process for the site.

It is also intended to deliver a site for a sports academy of 9.7 hectares on land within the Dollarfield portion of the landholding. The final design of this element requires to be agreed but will comprise a mix of grass and synthetic sports pitches for a variety of sports, indoor sports facilities and changing rooms areas, access and parking provision in line with Council requirements and landscaping.

It is intended to deliver land for the expansion of Strathdevon Primary School on Dollar Academy land due south of the existing school campus. This could include additional/new community facilities provision. A small scale commercial area will also be included within the overall masterplan to allow establishment of new local businesses or relocation of existing ones to new premises.

The final details of the above will be informed by the masterplan and community consultation processes that will be undertaken as part of the forthcoming planning application process.

Full technical assessment of the site will be undertaken as part of planning application process. A Flood Risk Assessment will accompany any application made to the Council. The portion of the site that is the subject of the Local Development Plan allocation H47 is outwith the floodplain of the River Devon. The area hatched blue on the location plan is, in part, located within the medium risk area of flooding as shown on the latest SEPA flood map. This area is, however, proposed for sports pitches provision. The proposed location of pitch provision within the blue hatched area as shown on the location plan is partially within the medium risk flood plain of the River Devon and Greenbelt but is reversible, low impact development that can be technically accommodated therein and, it is suggested is an appropriate use in the Greenbelt.
Water and drainage infrastructure to be delivered by the proposed development will be done so in phase with development. This will be set out in detail as part of the forthcoming planning application process.

The scale of the mixed-use development proposed and the nature of the uses lend themselves to on-site energy generation e.g. through solar power and/or district heating that could be of benefit to the wider community. The forthcoming planning application will comply with the renewable energy policy framework set out in the Adopted Local Development Plan where appropriate and relevant to the uses proposed. Details of such provision will be set out in the planning application.

Proportional developer contributions will, likely, be required for the delivery of affordable housing, education, off site roads improvements and open space delivery as per the Adopted Local Development Plan.

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<tr>
<th>Tillicoultry, Coalsnaughton &amp; Devonside Community Council</th>
<th>General Issues</th>
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<td><strong>TILLCOULTRY</strong></td>
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<td>Harviestoun Hotel – move towards housing use – future of Hotel and the ground in front. The loss of the Hotel as the main base in the community for funerals, meals etc is unfortunate however a fait accompli. The main CC concern from here is the preservation of the grassed area to the front. Any move to develop there would obscure the listed building and create flooding risk from the Kirk Burn which would depend on the area to accommodate water if the A91 culvert were to choke.</td>
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<td>Cemetery – extension and car park? – the improvement to the road network in the Cemetery probably removes the need for a car park at the front. The capacity for a cemetery extension on the east side still requires to be established however.</td>
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<td>Nursery/Golf Driving Range – housing use? – tied in with the Cemetery extension. Any move to put housing on the east side of Tillicoultry south of the A91 is unlikely to be supported by the CC.</td>
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<td>Landlocked house in Elistoun Drive – the problems surrounding the landlocked property appear to derive from problems of the owners own making however the Council should be acting on behalf of the community trying to get a pragmatic solution.</td>
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<td>Middleton Mill site in Upper Mill Street – progress with housing use? – there is a general problem with the range of housing options coming on to the market. Elderly owners of large houses have little opportunity to downsize into suitable housing. The Council’s historic interest has been in providing affordable housing, which has mostly been Housing Association/social housing (as per the Institution Place site) or has provided small housing units in less accessible areas such as at Coalsnaughton Glen. The Middleton Mill site shows no sign of being developed and anecdotal word on the street suggests that the Quarry owners own that site and have no intention of seeing it developed at the moment.</td>
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<td>Lower Mill Street housing development – realistic prospect? – some effort seems to be being made to market this site however the CC would like to know if the flooding risk posed at the site makes any development really viable.</td>
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<td>Sport developments around the Public Park – the possibility of a major development of this area was mentioned during the production of the Community Plan. The CC will expect to see some detail on how this would be achieved whilst protecting the Public Park.</td>
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<td>Tillicoultry Quarry – future/ re-instatement – the situation with the continuing planning consent for the Quarry and the point at which the quarry will move into its restoration stage once again needs to be covered in the Development Plan.</td>
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<td>Town Hall clock tower – the CC hope to co-operate with the Tic-Toc Group to resolve what the future of the clock tower will be.</td>
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Flooding issues – a meeting will be held in February encouraging the community to act with the Council and other agencies to form a Flooding Group with a remit to identify areas of concern and put in place preventative solutions.

**COALSNAUGHTON/DEVONSIDE**

Amalgamation of Coalsnaughton and Devonside – the development of virtually all of the ground which currently separates Coalsnaughton from Devonside provides significant opportunities whilst posing some risks.

Traffic issues in Devonside - despite recent changes to the road through Devonside it remains an unsatisfactory arrangement which needs a longer-term solution.

B 9140 – Plans for upgrade? – what are the Plans and timeframes for the further improvement and upgrade of the B 9140.

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**8 Muir Homes Ltd. | Lornshill, Alloa**

Proposed new development site comprising 8ha of greenfield land last used for agriculture at Lornshill, Alloa.

Although there have been no recent discussions regarding the site submissions were made during the previous LDP process to have it designated as a housing opportunity site.

Surrounding land uses include housing to the south, education to the east and farmland and woodland to the north and west.

Site is owned by Muir Group and would be developed by Muir Homes (part of the Muir Group).

Proposed use is for a residential development (circa 100-125 houses) with retained/new woodland, public open space, landscaping and SUDs provision. The housing would comprise a variety of residential properties including market and affordable housing. House sizes would range from 2 to 5 bedrooomed with a range of properties to address local requirements.

A Landscape and Visual Impact Assessment has been carried out and submitted in support of the site’s allocation.

There are not thought to be any capacity restrictions for water or foul drainage.

There is a listed building adjacent to the site at Lornshill Farmhouse (category B), development
layout/new planting proposals would be prepared to suitably mitigate impacts.

On site energy generation would be subject to further investigation and discussions with utility providers (in discussion also with Clackmannanshire Council).

Muir Homes would aim to bring forward development as soon as practically possible. On the basis that the site was allocated then an early planning application would be made with on-site development likely within years 2 to 5 of the new LDP. The site would therefore be fully effective within the initial 5 year period of the LDP.

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<th>9</th>
<th>Muckhart Golf Club</th>
<th>Muckhart Golf Club</th>
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<th>SNH</th>
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We confirm our overall support in continuing your strong policy for Clackmannanshire’s landscape and natural assets. Our comments primarily focus on the following:

- A place-based plan, which makes the most of Clackmannanshire’s natural assets for people. Related to this is a suggestion for a proactive approach to site searches based on place characteristics, functions and connectivity.
- Aligning community planning and development plans
- The emerging City Region Deal, including initiatives with opportunities to connect people with nature
- An approach to planning for Green Networks that provides more detail on networks of green infrastructure in and around settlements, and on key connections between settlements
- Making the most of Clackmannanshire’s significant coastal assets
- Streamlining LDP, SEA and HRA processes and endorsing previous approaches
- Some suggested policy changes, including ancient woodland and mineral restoration

**Connecting people and nature through a place based approach**

The new LDP provides an opportunity to give greater focus to the spatial representation of place and the green infrastructure that supports successful places and connects communities. Our view is that nature-based solutions can help achieve successful sustainable, low carbon, natural resilient places and connected places, which are defined as key planning outcomes by Scottish Government. We will be pleased to discuss how the benefits from Clackmannanshire’s green infrastructure assets can be fully realised.

We would welcome a discussion on how community planning and development planning processes can be best aligned for Clackmannanshire, and how development plans take account of the Community Planning Partnerships.

We recommend that site allocation is a proactive process, including ‘where’ and ‘how’ housing should be delivered in the Plan area, taking into account place characteristics, functions and connectivity. High quality places are more likely to be delivered if design frameworks and development briefs are produced by the planning authority. We suggest a collaborative approach on this including how new housing relates to town centres, other neighbourhoods and how people move around between these areas.

**City Region Deal**

We support the strong emphasis on community, sustainability and the natural environment that is coming through in many of the proposed projects and we see the role of the natural environment as a key underpinning asset. We consider that the LDP should embed a place based approach and appropriately steer how City Deal development proposals should be delivered. We would encourage the Council to set out details on the landscape and natural heritage assets which should be protected and to identify project-specific design principles and outcomes required, including in relation to green infrastructure and active travel infrastructure. We would be happy to work with you to ensure that landscape, natural heritage and active travel are fully considered in developing proposals.
We would welcome an early discussion to understand intentions to reflect City Deal opportunities within the LDP. Potential initiatives we would be interested in discussing with you (ref. Report to Council 31 August) include:

- ‘Investor Confidence’: regeneration of Alloa Town Centre, and the provision of enabling transport infrastructure
- ‘Sustainable Place’: Inch of Ferryton coastal realignment project creating wildlife habitat and flood defence
- Alloa Marina Development and regeneration in the Alloa South and East area

**Green networks and active travel**

We supported the inclusion of the Clackmannanshire Green Network in the adopted LDP. Given the emerging city region deal, we consider that further work should be progressed through LDP2. We would recommend the following preferred approach:

- Identify the existing green network assets which should be safeguarded – with a focus on the settlement level green networks, but also recognising important connections within the wider city region context, into Stirling and Fife;
- Identify local green network priorities and opportunities for green infrastructure delivery at a site level as part of clearly stated site requirements in development briefs and design frameworks, including for city region deal investment areas;
- Set out design standards for green infrastructure in new developments.

We consider that this represents good practice in terms of spatially representing green network opportunities. We would be pleased to discuss how we could best work with you.

For LDP2 we suggest further consideration of how development in Clackmannanshire can support *A Long-Term Vision for Active Travel in Scotland 2030* (the “2030 Vision”). This Vision sets out a role for planning that includes Community Planning Partnerships and which emphasises putting people and place before vehicle movement.

The proximity of Clackmannanshire’s settlements and their relationship to settlements in adjacent authorities provides significant opportunities to help deliver the Vision of walkable, mixed neighbourhoods, facilities within walking distance of where people live and population densities sufficient to make public transport and local services viable. Clackmannanshire has some excellent off-road active travel networks (walking and cycling) that connect settlements and we recommend that these and other off-road active travel networks within and beyond Clackmannanshire are also spatially identified in the LDP as an active travel map.

Through our input to the city region deal, we are currently working with transportation colleagues to progress a feasibility study for an active travel crossing over the River Forth, using the piers of the former Alloa rail swing bridge. Discussion is at an early stage, but it is hoped this feasibility study can be completed within this financial year.

**Clackmannanshire’s significant coastal assets**

Clackmannanshire contains estuarine and coastal sites (such as Black Devon Wetland (para 7.41) which have great potential to form a key ecological network and significant assets for the area. We would be pleased to support you with this process and recommend the commitment to work towards this network is also stated in the new LDP.

As part of this network we welcome the ambition to progress the Inch of Ferryton managed realignment and Inner Forth landscape Initiative as part of the Inner Forth wetland network, and are pleased to offer our continued assistance to help enable this.

**National Coastal Change Assessment (NCCA)**

We would like to highlight the NCCA which informs policy makers of past and anticipated future coastal change and promote greater appreciation of the ‘assets’ which are vulnerable and resilient to coastal erosion: [http://www.dynamiccoast.com/about_project.html](http://www.dynamiccoast.com/about_project.html) and individual coastal cell report: [http://www.dynamiccoast.com/files/reports/NCCA%20-%20Cell%20-%20Fife%20Ness.pdf](http://www.dynamiccoast.com/files/reports/NCCA%20-%20Cell%20-%20Fife%20Ness.pdf)

As a partner in the NCCA research project we will be pleased to facilitate a cross boundary discussion...
Climate change
We suggest that further discussion between stakeholders is needed so the MIR can set the correct framework for adaptation and mitigation.

Policy recommendations
We would be pleased to discuss additional policy suggestions for LDP2 at this stage such as:

Protection of ancient woodland: We support the approach to protection and enhancement of Clackmannanshire’s significant tree and woodland resource. We recommend that specific reference is added to Policy EA6 in terms of the need to protect and enhance Clackmannanshire’s ancient woodland resource, as explained in the Woodlands and Forestry Supplementary Guidance (para 2.5.2). We refer to the Ancient Woodland Inventory which provides provisional guide to the location of ancient woodland: https://www.snh.scot/sites/default/files/2017-06/C283974.pdf.

Minerals restoration: We recommend Policy EP10 is amended to include natural heritage restoration and aftercare solutions to minerals sites.

An iterative environmental assessment process for the LDP – Strategic Environmental Assessment (SEA) and Habitats Regulations Appraisal (HRA)
Local Development Plan site assessment and SEA: We strongly support the integrated SEA and LDP site assessment process provided in the adopted LDP which is an example of good practice. This should be less resource-intensive, save duplication, and help to ensure better integration between the LDP, SEA and HRA. We encourage a continuation of this approach in LDP2.

Our Local Development Plan: Site Assessment and SEA Checklist can also help integrate the two processes further. The three SEA consultation authorities have been looking at whether there’s a way to streamline Local Development Plan site assessment and SEA processes. Please note that the checklist offers suggestions and we recommend you adapt this to fit your area’s needs best: https://www.snh.scot/sites/default/files/2017-06/A1636437-SEA-Assessment-Local%20Development%20Plan%20-%20Site%20assessment%20and%20SLA%20checklist.pdf

Habitat Regulations Appraisal (HRA): As LDP2 is a review of the still recently adopted plan and as HRA of LDP1 gathered much of the relevant information for assessment, we expect that a more concise approach to HRA could be supported this time. We are happy to support you in the assessment process as and when needed as the LDP and its relevant environmental assessments progress.

11 SEPA Various

Development Plans
SEPA have produced a series of topic based guidance documents to support the preparation of development plans. The guidance outlines the types of issues that we would expect to see covered in a plan. It covers five topic areas which are available through the following links:

- **Flood risk**;
- **Sustainable resource use** including zero waste, district heating and heat networks and renewable energy;
- **Water environment**;
- **Soils**; and,
- **Air quality and co-location**

The topic guidance will soon be supported by background papers that include useful contextual information including links to key documents and other sources of information. They will shortly be available on our website but in the meantime please contact us if you would like more information on them.

Development plans have an important role in addressing climate change. Climate change is a cross...
cutting issue that affects all development plan policy areas. We have prepared a planning information note on how our guidance can help your development plan contribute to reducing greenhouse gas emissions and increase our resilience to climate change.

**Main Issues Report and SEA**

We have also identified sources of information and guidance we hold that should assist you in shaping the Main Issues Report and baseline information for the SEA.

**Information requirements for screening potential sites**

In order that we can provide you with comprehensive, accurate comments throughout the development plan process regarding potential sites we need you to provide us with the following information for all proposed allocations. It is important that this includes sites that have previously been allocated for development in the adopted plan, to enable their continued effectiveness to be reassessed (for example, in light of new information relating to flood risk).

Given the complexity of the task that we undertake to assess the sites with internal consultees we ask for a consultation period of 6 weeks and that the sites have been pre-screened with only viable sites being submitted for consultation where possible.

Due to past experience we recommend that a table is kept within your authority of all the reference numbers/names used for each site from the outset of the process. The provision of this information to us at the later stages of the DP process makes matching up previous comments a lot more straightforward.

We request that you reassess and consult us on existing allocations without development consent you propose to retain in the updated plan, within the context of current information and policy, as advised in PAN 1/2010 and **Scottish Government flood risk guidance** (June 2015).

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<tr>
<th>12</th>
<th>Campbell Properties</th>
<th>Policy SC23 ‘Development in the Countryside – General Principles’</th>
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<td></td>
<td>Development in the Countryside – Requirement for “Locational Justification” within SC23 is outdated and requires to be removed from the LDP in line with national guidance and to bring Clackmannanshire into line with other neighbouring authorities, including Stirling, Perth &amp; Kinross, Falkirk &amp; Fife Councils. This has been actioned by all other neighbouring planning authorities, see below. Clackmannanshire has failed to stay up to date in this respect.</td>
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<td>SPP 2014</td>
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<td>Stirling Council Policy 2.10 – Housing in the Countryside</td>
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<td>Stirling Council Supplementary Guidance SG10 – Housing in the Countryside</td>
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<td>Perth &amp; Kinross Council, Policy RD3 – Housing in the Countryside</td>
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<td>Perth &amp; Kinross Council, Housing in the Countryside Guide</td>
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<td>Fife Council, Policy 8 – Houses in the Countryside</td>
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<td>Falkirk Council, Policy CG03 – Housing in the Countryside</td>
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<td>Falkirk Council, Supplementary Guidance SCO1 – Development in the Countryside</td>
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|    | The Council have a responsibility to ensure that policies are up to date and that Clackmannanshire is not falling behind other neighbouring Local Authorities. SC23 requires to be suitably modified to remove the current outdated requirement for “locational justification”.

<table>
<thead>
<tr>
<th>13</th>
<th>Greig Strang</th>
<th>Policy SC23 ‘Development in the Countryside – General Principles’</th>
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<td>See #12</td>
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</table>
14 **Diageo**

Diageo request their land at Carsebridge, as allocated within the current LDP (Sites H03, H04 and B03 as shown in the current LDP extract below) is included within the forthcoming LDP.

![Map of Diageo sites](image)

The exact form of development is the subject of current and ongoing discussions with Clackmannanshire Council and it is likely that the potential of the site will be further developed in discussion in the forthcoming months.

15 **Historic Environment Scotland**

We would be happy to provide advice on any potential allocations where we consider that impacts on our historic environment interests are likely to be the most significant.

We look forward to providing further comment in relation to the emerging Local Development Plan in due course.

16 **The Coal Authority**

The Coal Authority and can confirm that we have no sites to put forward and no specific comments to make on local issues for consideration at this very early stage in the process.

17 **Marshall Construction Ltd.**

Policy SC23 ‘Development in the Countryside – General Principles’

See #12

18 **Sandy Nicol**

Policy SC23 ‘Development in the Countryside – General Principles’

See #12

19 **Muckhart Community Council**

Wish to see a review of the Development in the Countryside policy to ensure that the wording is unambiguous and, in particular, it is in accordance with current Scottish Planning Policy. Also the lack of a green belt designation around Muckhart makes the development in the countryside policy even
Recent planning applications for housing development in the countryside have resulted in different interpretations of the present policy, particularly when Scottish Planning Policy on rural development is taken into account. Believe that decisions, including the interpretation of Scottish Planning Policy by the Local Review Body in relation to application 14/00062/FULL, point to a need to review the Development in the Countryside Policy in the Local Development Plan.

Support the development and maintenance of a comprehensive foot and cycle path network within the Muckhart area, which links effectively to routes out with the area, in support of further Safer Routes to School and Active Travel initiatives. Wish to see further links developed between Muckhart and the surrounding areas, in particular, to Dollar and the rest of Clackmannanshire, as well as to the Perth & Kinross Active Travel network.

The Muckhart settlement boundary was changed in the present LDP as a result of the designation of site H49 for housing. It might be advantageous to make further minor changes to the boundary to include properties which could be regarded as being within the village envelope but still technically outside the formal settlement boundary, for example, the properties along Drumburn Road, as far as Drumburn Farm. This issue is closely related to LDP policies on development in the countryside and should be considered at in relation to those policies.

Suggest the designation of the area to the south of the A91 between Muckhart and the River Devon as a Special Landscape Area (SLA). The 2015 LDP recognises the significance of the Clackmannanshire landscape and the review of the LDP gives the opportunity to review the areas of Clackmannanshire which are at present designated as SLAs.

Need to look at sustainability in terms of transport, buildings and energy production. There has been a great increase in the use of alternative fuel vehicles particularly Electric Vehicles and hybrids. The need for domestic charging points and public charging will have an impact on Planning Policy particularly in relation to industrial and commercial areas and access to charging points needs to be considered in new housing developments. Need to look at how public charging points will be provided and funded.

Buildings produce thirty per cent of all emissions and the promotion of commercial, retail and residential buildings that substantially reduce emissions through energy efficiency and renewable energy use needs to be promoted in the LDP.

Energy production needs to be examined. Many houses can now become prosumers – both producers and consumers – of energy and this needs to be encouraged with greater use of solar panels, biomass and heat pumps etc. It only takes a few houses to participate in a District Heating scheme and this approach should be encouraged. Small scale renewable energy production needs to be developed as well and this can include biomass, solar arrays and eventually the production of hydrogen as a fuel. This can be achieved by production at the windfarms or harnessing the power of water from the hills to produce hydrogen.

The support for alternative fuel vehicles particularly EVs need to be addressed by the Transport Policy and will be a major part of any Air Quality Strategy. The Council’s Sustainability Strategy needs to address these issues particularly in buildings and energy production.

**Visit Scotland**

We would hope that the forthcoming Main Issues Report will sustain the priority to support the development of tourism and tourism infrastructure in the area, as highlighted in the current Local Development Plan’s Strategic Objective 2 (for sustainable Economic Growth). We note that the plan identifies the need to support the development of new visitor accommodation, and we would recommend that this point is strengthened in the forthcoming Report.
It is increasingly clear from our work with local and national partners on the continued development of Clackmannanshire as a tourism destination in the years ahead that the area's chief product strength is its natural heritage, particularly the scenic beauty and opportunities for walking, cycling and other outdoor pursuits around the Ochil Hills.

We are pleased that this is reflected in the Local Development Plan (also Strategic Objective 6) and would strongly recommend that it is highlighted in the Main Issues Report as a growing priority.

Similarly, we welcome Strategic Objective 7 on the Built Environment, particularly in respect of the future tourism potential of built heritage assets that attract visitors, and would recommend that this is also reflected in the Main Issues Report as a strong basis for future growth.

We would encourage support for new initiatives which will attract more visitors to Clackmannanshire, particularly the development of the Japanese Garden near Dollar as a visitor attraction, and the development of the wetlands which has the potential to stimulate travel by birdwatchers during the low, winter season.

We would recommend that the Main Issues Report should highlight the importance of support for other tourism and visitor-related projects which emerge in the months ahead through the Stirling and Clackmannanshire City Region Deal.

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<th>21</th>
<th>Woodland Trust Scotland</th>
<th>Policies EA6 and EA7</th>
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The need to protect and enhance ancient woodland and trees present in Clackmannanshire. For the purpose of this consultation, we will use the terms ‘ancient woods and trees’ or ‘ancient woodland’ to include: ancient, semi-natural woodland, long-established woodlands of plantation origin and plantations on ancient woodland sites which still contain remnants of ancient woodlands.

New planting cannot begin to replace what is lost with the destruction of ancient woodland. It is therefore essential that this habitat is protected from development threats.

The SPP asks planning authorities to reflect their duty for biodiversity conservation through development plans and development management. According to the SPP planning authorities are also encouraged to develop supplementary strategies ‘to inform the development of forestry and woodland in their area, including the expansion of woodland of a range of types to provide multiple benefits.

We note that the current Clackmannanshire LDP has two policies which concern ancient woods and trees: Policy EA6 – Woodlands and Forestry and Policy EA7 - Hedgerows, Trees and Tree Preservation Orders.

Below we will outline how these polices can be amended to be more effective at protecting precious ancient woods and trees, as well as other types of woods from development threats.

Policy EA6: in essence this policy is concerned with planting and removal of trees. Here we would welcome the following additions:
- Planting should be done in accordance with Forestry Commission's Policy 'The right Tree in the Right Place', with preference given to native trees as appropriate.
- Removal of ancient trees is unacceptable and where development will take place in close proximity of ancient woodland, developers must submit an ancient woodland protection strategy prior to the development taking place. WTS actively monitors planning applications through its volunteer network and we submit objections and recommendations where we see that development plans have the potential to negatively impact on ancient woodland.

Policy EA7: this policy is concerned with woods and trees which make a positive contribution to local amenity. We believe that the role of trees should not be limited to their contributions on local amenities, but also to the other environmental benefits which trees and woodland can bring. In this respect, this policy can also reinforce a strong presumption against ancient woodland removal for development purposes. We are delighted with the statement ‘The Council will favour the use of native species or species of known biodiversity value.’ and the requirement development proposals to include appropriate replacement planting.
The current Clackmannanshire identifies the following environmental challenges: the need to adapt to climate change and tackle biodiversity decline, and improve water quality. Policies to improve the built and natural environment can help address these challenges and we believe that firmer provisions against development on ancient woodland sites and for development which protects ancient woodlands and trees through effective strategies need to be in place.

Below we have set out a number of ways in which development can impact ancient woodland:

- Chemically through acidification, eutrophication and toxic pollution;
- Disturbance by noise, light, trampling and other human activity;
- Fragmentation as a result of the destruction of adjacent semi-natural habitats;
- Provides a source of non-native plants and aids their colonisation;
- Cumulatively – The cumulative effect of development is more damaging to ancient woodland than individual effects which should not be considered in isolation.

Plant and animal populations are exposed to damaging ‘edge effects’ from outside the woodland site. External impacts increase with the intensity of land use. Detrimental ‘edge effects’ have been shown to penetrate woodland causing changes in microclimate that extend up to three times the canopy height from the forest edges. Detrimental edge effects include localised changes in humidity, temperature and wind. For this reason it is paramount that any development in the proximity of an ancient woodland site is required to provide a strategy to the council on how the developers intend to protect and buffer the adjacent ancient woodland site or trees.

Light pollution in residential areas is generated from buildings, vehicle lights and security lights and includes chronic or periodically increased illumination, unexpected changes in illumination, and direct glare. Light pollution near to ancient woodland is, therefore, likely to substantially affect the behaviour of species active during dawn and dusk twilight or nocturnal species, such as moths, bats, and certain species of birds, resulting in the decline of some species.

We have also heard concerns regarding development too close to rivers and water streams in Clackmannanshire. Many of the small rivers and streams have been built over, or the natural riparian woodland destroyed or damaged by inappropriate development. The fields, as well as banks, along the Devon (the main river in Clackmannanshire) should be protected, both for wildlife, to help prevent flooding, and to allow natural regeneration of trees. We would suggest that guidance is given to developers to ensure that an appropriate buffer zone is established between rivers and the development areas. This recommended buffer zone can be at least 15m, but this will vary on a case by case basis.

In Scotland much of the woodland habitat is fragmented from road infrastructure development. We understand the need for increased connectedness for people, however, road building has had a negative impact on wildlife habitats. To this end, we recommend that the council looks into connecting current fragmented habitats; one way of doing this is by building green bridges for wildlife, and not allowing development that furthers habitat fragmentation.

We think that in the first instance development should be encouraged on brownfield sites, and on derelict building so we recommend that the planning authority can encourage developers to use these sites by promoting them better in its next LDP. Designated greenbelt sites should be clearly identified and the planning authority should aim to retain them.

Summary:
The main issue we would like you to consider for inclusion in LDP2 is the protection and enhancement of ancient woodland for the many benefits it provides.

- Development on an ancient woodland site is completely inappropriate and must not be allowed.
- Development plans adjacent to an ancient woodland site must provide the council with a proposed strategy which intends to protect and buffer the adjacent ancient woodland site or trees.

Additionally, we would like Tree Preservation Order sites and sites identified in the Native woodland Survey of Scotland as sites of high constraint areas, rather than medium constrain areas in the surface coal mining hierarchy listed in your guidance on Surface and Coal Mining.
Planning History/Context:
The issue of ancient woodland protection has been considered in the current LDP in Policy EA7 but we believe that more specific requirements can be made where development is in adjacent to or in proximity of ancient woodland. The inclusion of a strong presumption against the removal of ancient woodland must be included.

Legal: The Nature Conservation (Scotland) Act 2004 places a specific duty on all public bodies to further the conservation of biodiversity and to have regard to the Scottish Biodiversity Strategy 2004. By 2030, the Strategy aims to produce landscapes where "Organisms can move, feed, reproduce and disperse effectively, and are better able to adapt to changing circumstances of land use and climate change". Ancient and native woodland protection and enhancement, as well as avoiding further habitat fragmentation and promoting better habitat connections are key to biodiversity conservation.

Relationship to other Strategies, Policies and Plans:
We note that there is a Stirling and Clackmannanshire Forestry and Woodland Strategy which shows awareness of the provision to protect and enhance ancient woodland in the Scottish Planning Policy. The strategy also sets out the woodland cover size and types (ancient, semi-natural, native, conifer plantation etc.) found within the two planning authority areas.

However, this strategy does not set out any specific actions for the protection of ancient woods and trees. Furthermore, the current LDP directs developers to consult the strategy but we feel this does not offer any guidance, being merely a description of the woodland area rather than setting out key requirements. In order for developers to have clarity and to be able to take action in line with the SPP, there is a need for both the LDP2 and the Stirling and Clackmannanshire Forestry and Woodland strategy to list key requirements such as:
- ‘Proposals for removal of woodland must be consistent with the Forestry Commission Scotland’s Control of Woodland Removal policy.’
- ‘Development on ancient woodland sites in unacceptable’
- ‘Where developments have ancient woodland in proximity, a strategy for protecting and buffering the ancient woodland and trees must be presented and approved by the local planning authority before development takes place’.

The issue of ancient woodland protection can also be addressed through a policy included in the LDP2, similar the existing policies (Policy EA6 and EA7) in the current LDP. This supplementary guidance is very important for our environment and should be maintained in the next LDP to help developers make decisions and develop in a responsible way.

<table>
<thead>
<tr>
<th>22</th>
<th>RSPB Scotland</th>
<th>Policies EA2 and EA3</th>
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<td>There are two policies that we believe could be strengthened.</td>
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<td></td>
<td>Policy EA2 - Habitat Networks and Biodiversity</td>
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<td>Given the increasing spread of invasive non-native species (INNS) throughout the County, the control of INNS is vital and all bodies should be playing an active role in preventing their spread and advocating their control. We would therefore like a specific reference to INNS in the LDP. We consider that this would be more appropriate as an issue rather than site by site, and suggest this fits best under Policy EA2. The Clacks Biodiversity partnership have supplied some suggested wording, which RSPB Scotland supports.</td>
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<td>Under EA3 ‘Protection of Designated Sites and Protected Species’ there is a policy for Local Nature Conservation Sites (LNCS) despite there being no formally designated sites in Clackmannanshire. Since the publication of the LDP there has been some progress towards reviewing, assessing and confirming the sites as listed in the Clackmannanshire LBAP. The Council need to ensure that the timescales for this work are compatible with the production of the new LDP as it would be remiss for another Plan period to have ended with no LNCS formally designated.</td>
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<td>New sites may be proposed once the existing list has been assessed, this is to ensure all sites that are considered locally important could be afforded some protection and these should be considered as potential LNCSs in the new LDP. This also strengthens a high quality habitat network across the local authority area and across boundaries with neighbouring local authorities. Therefore, ideally the policy</td>
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wording should be amended to recognise those sites of LNCS quality should be afforded some level of protection until they are formally designated.

We are confident the LNCS working group are able to assist in this process but this is ultimately a Council obligation to have these sites formally designated.

There should be guidance associated with this policy to further explain the level of protection these sites are afforded, the occasions when development would be permitted and the level of mitigation and/or compensation that would needed to gain consent and how this would be secured.

It is clear that advice from specialists and agencies on INNS legislation is not always known about and the need to seek this advice is still not communicated well.

23 Clackmannanshire Biodiversity Partnership Policies relating to biodiversity and the natural environment

Clackmannanshire Biodiversity Partnership recognises that as stated in section 1.5 of the Introduction the principal objective of the LDP is to create the conditions for sustainable growth, and we should like to emphasise our strong support for the set of principles established in section 1.6, namely that this growth cannot be achieved at any cost, that Clackmannanshire’s clean and attractive environment is one of its main assets, and that “The policies and proposals in the Plan have been developed not simply to deliver the growth we need, but to do it in the context of the challenge to improve quality of life and improve our natural and built environment.”

The Partnership emphasises the value of Strategic Objective 1 on “A Clear Framework for Positive Change” which encompasses “protecting and enhancing our environmental assets and heritage for present and future generations” and we would urge the retention of this in the revised LDP.

Most of the rest of the comments in this submission refer to policies under Strategic Objective 3 Environmental Sustainability, and Strategic Objective 6 Natural Environment, although we note that these measures also support economic development and health and wellbeing outcomes, and we welcome the linkages that other policies in the current LDP make to environmental policies and the fact that all current policies have space for “environmental Implications” which we should like to see retained.

The exception to this is Policy SC9 Developer Contributions where we should like to reaffirm our support for provision in this policy for “Protection and enhancement of green networks and natural habitats”. We strongly support this policy and we should lie to see it retained in its entirety.

• Policy EA1 - Clackmannanshire Green Network

We strongly support this policy and we should like to see it retained in its entirety. In addition to the intrinsic benefits of the policy, the Council has benefitted from multiple projects funded by the Central Scotland Green Network funding and from skills and project management capacity available through partnership with the Central Scotland Green Network Trust.

• Policy EA2 - Habitat Networks and Biodiversity

We strongly support this policy and we should like to see it retained. However, given the increasing prevalence of invasive non-native species (INNS), and noting the negative impact of INNS on development-related issues such as property and property prices (Japanese knotweed), soil stability and flood risk (Japanese knotweed, Himalayan balsam and giant hogweed) and health (giant hogweed) among others, we should welcome inclusion of specific reference to INNS in the LDP. We consider that this would be more appropriate as an issue rather than site by site, and suggest inclusion of text such as the following to the second bullet point in Policy EA2: “including effective measures to identify and control and invasive non native species on the development site and biosecurity measures to prevent the spread of invasive non native species from the development site;”

• Policy EA3 - Protection of Designated Sites and Protected Species

We strongly support this policy and we should like to see it retained. In addition we should like to make one observation regarding International Designations and one suggestion regarding Local Designations.
International Designations (also known as Natura Sites)
We have encountered some uncertainty about the how future status of these sites, designated under EU Habitats and Species directives may be affected by UK withdrawal from the European Union. Notwithstanding the outcome of future negotiations upon this subject, we note that (a) the current proposed arrangements are that EU laws applicable in the UK are transposed into UK law unless other arrangements are made by ministers, and (b) these designations in turn reflect United Nations conventions and as such these sites are established under UN in addition to EU requirements. Notably, article 8 of the UN Convention on Biological Diversity 1992 requires systems of protected areas, and Part 1 (2)(b) of the Nature Conservation (Scotland) Act 2004 on public body duties makes specific reference to requirements of the UN Convention. As such there is a double default against any Natura sites lapsing automatically as a consequence of UK withdrawal from the EU.

Local Designations
We consider that local designations, in particular Local Nature Conservation Sites, are of special importance for the Local Development Plan because the power to designate these sites lies with the Council. The current LDP observes that “Local Nature Conservation Sites (LNCS) in Clackmannanshire are currently being reviewed. Once designated they will be accorded the level of protection outlined in Policy EA3. Further information on designated sites and priority habitats and species is available in the Clackmannanshire Biodiversity Action Plan.”

The Partnership is approximately half way through technical assessment of the sites listed in the Biodiversity Action Plan (which has been reviewed and extended since the publication of the LDP). These sites will still require designation by the Council. The Partnership would welcome the addition of Supplementary Guidance on Local Nature Conservation Sites in order to provide definitive and transparent guidance in one document for landowners, developers and other interested parties on the sites and the requirements that apply to them. This approach has been taken successfully by other local authorities and would support the Council in meeting its Biodiversity Duty under the Nature Conservation (Scotland) Act 2004. Establishing a suite of formally designated Local Nature Conservation Sites was identified as one of the major priorities when the Local Biodiversity Action Plan was completed and also in the Council’s three yearly Biodiversity Duty report to the Scottish Government required under the Wildlife and Natural Environment (Scotland) Act 2011.

These issues are covered by the Clackmannanshire Local Biodiversity Action Plan which in turn reflects the Scottish Biodiversity Strategy and the UN Convention on Biological Diversity. However, the LDP is the appropriate vehicle for placing these issues in the context of development planning in Clackmannanshire.

Marion Marsden

Loss of biodiversity

Development should be concentrated in existing towns and villages, filling in derelict sites; replacing derelict buildings; designing more compact parking areas (e.g. multi storey or underground).

Avoid building new roads which dissect important wildlife areas. Roads should not dissect woodland, or prevent wildlife moving between wooded areas.

Woodland should not be further destroyed. Existing areas of woodland should be completely protected and tree preservation orders should protect individual trees. Woodland should be extended by planting native species and by encouraging natural regeneration. Different areas of woodland should be re-connected to provide green corridors by which wildlife and native plant and tree species can migrate.

River banks and a wide corridor on either side of rivers should be protected from development, as these areas are naturally rich in biodiversity - both wildlife and semi-natural woodland and plants. They also provide valuable green corridors.

Fields should be protected against development not only for agriculture, but for wildlife and as a buffer against flooding.

Many towns and villages are being allowed to coalesce. The characteristic landscape features of Clackmannanshire are gradually being lost in a sprawling, indistinguishable urban landscape.
Clackmannanshire Council should provide clear green belt land between towns and villages, with vibrant, well-planned development within the towns and villages.

The population is ageing and Clackmannanshire has a large number of homeless people. The developments most urgently required are small flats and sheltered housing within the urban environment, which do not require the regular use of a car.

25 **Theatres Trust**

**Culture and community facilities**

Clackmannanshire has a range of important cultural facilities that contribute to the vibrancy of town centres, the local economy, and to the well-being of the local community. This should be reflected in the new Local Development Plan.

The new plan should therefore support arts and culture at all levels to support the local economy and ensure that all residents and visitors, and future generations, have access to cultural opportunities. Policies should protect, support and enhance cultural facilities and activities, particularly those which might otherwise be traded in for more commercially lucrative developments, and promote cultural led development as a catalyst for regeneration in town centres.

To reflect guidance on culture and town centre vitality in the Scottish Planning Policy, we recommend a policy such as:

Cultural and Community Facilities

1. Development of new cultural and community facilities will be supported and should enhance the well-being of the local community, and the vitality and viability of centres.
2. Major developments are required to incorporate, where practicable, opportunities for cultural activity to widen public access to art and culture, including through the interpretation of the heritage of the site and area.
3. The loss or change of use of existing cultural and community facilities will be resisted unless:
   a. replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
   b. it has been demonstrated that there is no longer a community need for the facility or demand for another community use on site.
4. The temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations will also be supported, particularly where they help activate and revitalise town centre locations and the public realm.

For clarity, and so that guidelines are clear and consistent, the accompanying text and the Glossary should contain an explanation for the term ‘cultural and community facilities’. We recommend this succinct all inclusive description which would obviate the need to provide examples: cultural and community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.

26 **Strawson Holdings Ltd.**

**Alva South**

We are acting for Strawson Property Ltd who own land adjoining the south side of Alva as shown edged blue on the attached map extract. A potential residential site is shown edged red.
This site was considered during the Examination of the current Clackmannanshire LDP and the Reporter's conclusions from the Examination report are attached. We draw your attention to paragraph 2 of the conclusions which state that:

"it may be necessary to look at land immediately to the south of the built-up area and this would be considered in any review of the local development plan”.

Alva is in need of regeneration which can be achieved by additional housing growth. The expansion on the south side (as indicated in the attached plan) is a sustainable option which would make use of existing infrastructure and capacity in Alva. The site is situated on the edge of existing housing and has easy access to local facilities. The area shown on the attached plan is not entirely subject to flood risk. The land to the south of the town slopes gently down to the River Devon, which forms a strong physical boundary. It is not of high landscape value and is subject to flooding part way to the town's southern boundary. Development of the land between the town and the area subject to flooding would not lead to coalescence with any neighbouring settlement, strong physical boundaries with these settlements would remain and the landscaping setting of Alva would not be affected. The opportunity would also be presented to develop the wetlands next to the river as a recreational opportunity for the residents of Alva, further enhancing it as a sustainable and economically viable location, with a number of potential locations for the provision of green links presenting themselves for access to and from the town centre.

The of area land within Strawson Property Ltd ownership currently extends to approximately 31.5 ha, (78 acres). However, due to the flood risk constraints, only the land which is outside of the area of potential flood risk and suitable for residential development is being promoted in this comment. This amounts to approximately 14.2 ha, (35 acres), shown edged in red on the map attached. We consider this site would be suitable to accommodate residential development amounting to circa 250-300 units. Access from the B908 road is feasible and links are easily accessible to existing housing. We consider that the green belt should be removed from the proposed development site because this part of the overall area designated as green belt no longer meets the requirements of this policy restriction. Development in this location would not lead to coalescence or affect the setting of an historic settlement.
One of the proposed changes in the Planning Bill due to be considered by the Scottish Parliament in 2018 is extending the timeframe for LDP’s to 10 years from the current 5 year period. There is merit in the Council allocating this site for development in the 5-10 year part of the replacement LDP, assuming that the lifetime is extended to 10 years under the changes proposed in the Planning Bill.

**27 William Graham Holdings | Clackmannan**

Proposed new development site comprising approximately 8.83 ha (21.88 acres) shown edged red on the map extract below.

![Map extract](image)

Site comprises agricultural land, with surrounding uses including agriculture, housing and transport infrastructure.

Site is owned by a family trust and discussions are ongoing with potential development partners.

Proposed use is for a settlement expansion comprising a mix of transport interchange, enabling low carbon housing development (mixed type and tenure) and other possible uses such as informal leisure and green space.

Assessments of the site are ongoing, including flood risk and drainage and education impact.

Envisaged developer contributions would include contributions to a new rail station and education infrastructure.

Opportunities exist for district heating and other low carbon energy sources to be considered.

**28 Paul & Helen Aldred | Ochil Road, Menstrie**

Proposed new development site comprising approximately 0.22ha (0.54 acres) shown cross hatched red on the map extract below.
Site comprises garden ground, with surrounding uses including gardens and countryside.

Proposal is to bring this area within the settlement boundary with the potential to develop 2-3 detached houses.

<table>
<thead>
<tr>
<th>29</th>
<th>Paul Edney for Hillfoot Homes Group</th>
<th>Site at East Menstrie Policy SC23 ‘Development in the Countryside – General Principles’</th>
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</thead>
</table>

Proposed new development site comprising approximately 15.47 ha (38.23 acres) shown edged red on the map extract below.

Site is greenfield and comprises agricultural land, with surrounding uses including agriculture, housing, commercial and transport infrastructure.

Site is understood to be informally under option.
Proposed use is for a residential development at a density of less than 10 per acre, therefore around 350 units.

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<thead>
<tr>
<th>No.</th>
<th>Name/Entity</th>
<th>Policy SC23 ‘Development in the Countryside – General Principles’</th>
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<tbody>
<tr>
<td>30</td>
<td>Eilidh Edney for Hillfoot Homes Group</td>
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<tr>
<td>31</td>
<td>Jacqui Edney for Hillfoot Homes Group</td>
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<td>32</td>
<td>William Scott</td>
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<td>33</td>
<td>Oliver Tannahill</td>
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<td>34</td>
<td>The Woods Caravan Park</td>
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<td>35</td>
<td>R. Marshall &amp; Partners</td>
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<tr>
<td>36</td>
<td>Brian Morris</td>
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See #12