

**CLACKMANNANSHIRE & STIRLING
STRUCTURE PLAN 3RD ALTERATION –
ISSUES STAGE**

**PUBLICITY AND CONSULTATION
REPORT**

December 2006



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Introduction

The following documents were issued for consultation in May 2006 and sent to the relevant stakeholders, placed in local libraries and Council offices and on the Councils' websites: -

- **Third Alteration issues report** - an overarching paper which discussed the need for the Structure Plan review including the potential future housing growth options.
- **Urban Capacity Study** - this looked at the potential to accommodate future housing development within existing towns and villages by identifying specific brownfield and infill sites.
- **Housing 2025 Research Topic Paper** - this looked at population and household projections to estimate the future additional housing land that may be required to meet the areas need to 2025.
- **Topic papers on Environment, Economic Development, Shopping, Rural Development, Minerals and Waste Management** - this paper discussed these other issues which the alteration will seek to address explaining the current context, the need for revision and associated issues.
- **SEA Scoping Paper** - There is now a legal requirement to fully assess the Environmental implications of any plan, policy or programme. Regulations set out the formal procedures that should be adhered to as part of this statutory process including early consultation with SEPA, SNH and Historic Scotland (referred to as the Consultation Authorities) regarding the scope of the assessment. A scoping report was produced in this context and was submitted to the Consultation Authorities. Part of this approach included the assessment of alternative options.

All written responses made to Structure Plan Issues Stage have been summarised and are contained within the first part of this report. A series of workshops with key community groups and key organisations were held to help inform the Councils' approach to the 3rd Alteration to the Structure Plan. These are also summarised within this report.

In order to update statistics on mineral working and resources, for the Background Report and to inform consideration of policy changes, a questionnaire was issued to a small number of sand and gravel extraction operators in the Plan Area. Only one response was received.

The comments received from this initial stage of consultation will inform the more detailed research that the Councils have to carry out before coming to a decision. Further public consultation will be carried out when a Consultative Draft Structure Plan Alteration is prepared in February 2007.

Clackmannanshire and Stirling Structure Plan 3rd Alteration – Comments at Issues Stage

Commentator	Rep.No.	Comments
Scottish Coal	3/1/1	The proposed Alteration to the SP to reflect, amongst other things, contemporary national policy, is welcomed. The proposed fitting of emissions reduction equipment to Longannet power station - extending its life and creating a larger demand for indigenous coal - should be considered material to coal supply policies in the area. The updated policy on opencast coal working should reflect SPP16 – there is not a presumption against opencast coal extraction. The Councils should engage with the Coal Authority and the industry to bring forward potential future coal working sites. The proposal to bring forward the programming of the Castlebridge strategic employment site is welcomed and supported.
Scottish Coal	3/2/1	Principal concern is surface mining of coal and assimilation into plan of latest guidance in SPP16. Plan must have regard to issues such as potential sterilisation of coal deposits by built development and identification of areas of search for opencast coal. Reiterates that Longannet power station needs on-going coal supply and that ideally this should be locally sourced. Further dialogue is sought on how policy on surface working of coal is to be expressed in the Plan. Scottish Coal still working on consideration of whether there are workable coal deposits in E Stirling.
Drygrange Estates (Agriculture & Forestry) Company Ltd	37/1/1	The Alteration should take cognisance of SPP15. A more balanced approach to rural development should be adopted. In particular new housing in the countryside should be favourably considered in the established gardens "once associated with a country/estate house" and in walled gardens. Such sites would enable "well designed small housing developments being located in appropriate countryside areas but well screened and within a good landscape setting".
East Dunbartonshire Council	62/1/1	There is concern expressed that there is no reference in the Structure Plan to the proposed Regional Park in the Campsie Fells. It is also believed that the Campsie fells could be managed and promoted in order to enhance their tourism and recreational potential. Development in the village of Strathblane, and surrounding areas should be kept to a minimum so that commuter traffic is not exacerbated. It is also the view that the current Green Belt policy for Strathblane should be retained.
Falkirk Council	63/1/1	No comments to be made at present.
Broomridge Community Council	74/1/1	The projected 9% population increase should not be exceeded. Best use should be made of Brownfield and Windfall sites. There are concerns regarding the proposed housing development on Weaver Row. Affordable housing should be administered by Housing Associations and not financed by the ratepayer. It should be in the joint interest of both Councils to reduce the uptake of Green Belt land.

Clackmannanshire and Stirling Structure Plan 3rd Alteration – Comments at Issues Stage

Commentator	Rep.No.	Comments
Drymen Community Council	84/1/1	It is inevitable that Stirling will grow. Recommends comparative trend and regression analyses. Inner city transport system needs some radical changes. Scale of growth? - marginal under-supply (presumably of housing) is the prudent policy. Appropriate distribution of 'cost segments' (presume house price bands) to avoid imbalance. Small scale settlement expansions preferable if they can build on existing communities without creating social or economic strain. Increased housing in the countryside is a useful concept in principle if infrastructure is adequate and nearby employment is available. Larger scale settlement expansions are only worthwhile if there are suitable sites, enough employment opportunities and a balanced in-migrating population. Rural Centres – Problems because new facilities such as Balfron high school and NHS are inaccessible to non-car owners. Rural Villages - If there is adequate well-paid employment the need for low-cost housing is reduced. There is too much concentration on housing rather than economic issues. Should not rely on private sector to provide infrastructure. Some 'magnet projects' such as Aberfoyle wool centre have useful economic spin-offs; similar smaller scale projects might assist other rural settlements. Mixed tenure housing sites should be identified but mix has to be right. Rural settlements lack dedicated sites for small scale commercial and industrial uses, eg. office clusters with common services, small workshop units etc. National Park - matter of degree. Developments that can create jobs and economic gain without detriment to the 'natural attractions' are desirable, but large scale retail, sports, leisure and entertainment centres should not be allowed in the Park.
Dunblane Community Council	85/1/1	Dunblane Community Council would be nervous about any relaxation of Greenbelt policy. In order to relieve pressure on house prices Greenfield housing should be considered. There should be more emphasis on delivering more genuinely affordable housing in Dunblane. The Barbush industrial estate should be protected from residential development. Dentist and Doctors services should have more emphasis within the Structure Plan. Moderate growth in the Stirling area would be welcomed.
Kippen Community Council	93/1/1	Kippen Community Council found the rural issues workshop interesting although not surprisingly a large part of the discussion focused on the National Park. The Community Council does not meet in July or August so these views do not necessarily reflect all of the Council. Concern was expressed that expansion of rural villages should be mixed tenure with consideration being given to the necessary infrastructure. Any revision of Greenbelts should be approached with caution as the whole character of a rural village could be altered with unsympathetic expansion.

Clackmannanshire and Stirling Structure Plan 3rd Alteration – Comments at Issues Stage

Commentator	Rep.No.	Comments
Loch Lomond & The Trossachs National Park	144/1/1	<p>Given the impending changes to the Development Plan System the Alteration will have a relatively short period of influence on local planning. The Park have a timetable for a Local Development Plan with a consultation draft early 2008. It will be important to secure an approach in the alteration which enables appropriate flexibility for the Park to develop its own strategic approach. Some of the Parks policy stance is established through the Park Plan and the Structure Plan alteration should avoid conflict with these. For instance the Park plan sets out the Parks approach to renewables and minerals which differ from that of the Structure Plan. To address these issues the Park should be identified as a separate planning area recognising the different planning context which applies. This approach will enable the Structure Plan to continue to apply across the whole area whilst recognising that variations in approach will exist. This is a similar approach to that taken in the Argyll and Bute Structure Plan. To examine and amend every topic area to reflect the stance of the National Park would be onerous and unjustified given the short shelf life of the Plan. There may be some difficulties in this approach , for instance if the Structure Plan review were to adopt a different stance conflicting with detailed policies in Alteration 1B. The implications for development control would have to be further considered.</p> <p>In terms of the locational strategy paragraph 2.5.6 should be amended to reflect the role of the Park Plan and the future National Park Local Plan. It should also explain that only certain policies will apply in the Park area. The Park should be shown as a separate planning area in Figure 2.3 (although this may still show the rural villages and upland area). A number of non contentious policies that would continue to apply are identified along with those where the approach should be left to the National Park Development Plan. In the Environment chapter ENV1-3 (with removal of reference to ENV4),ENV5, ENVP3, ENV6-9 could continue to apply but ENV4,7,10,11, 12-17 would not. In the jobs and homes chapter policies ED1,2,S2.H1,H2, HP2 and H3 would apply but ED3,4,S3 and 4, S5, T1, H4-H6 would not. In the community infrastructure chapter TR1,2 and INF1 would apply but SR 1 would not.</p> <p>In terms of the housing land allocation the 2004 projections would not require additional land. It is understood the Council may still wish to promote some growth. This presents a different scenario which would require to be clarified before responding formally. In principle the National Park can provide a share of the new housing land requirement as new housing will be required. The future Development Plan for the Park will identify where new housing is required informed by work to be undertaken this year on housing needs and where there may be a case for attracting new people into certain communities. At present it is not possible to say what this figure will be but a 10% share of a figure in the order of 1000 up to 2025 appears realistic. The Structure Plan would need to explain that the National Park share would be informed by the work being conducted on housing needs.</p>

Clackmannanshire and Stirling Structure Plan 3rd Alteration – Comments at Issues Stage

Commentator	Rep.No.	Comments
Rural Stirling Housing Association	156/1/1	<p>The relatively healthy 10 - 12 year housing land supply conceals a significant level of unmet demand for affordable and particular needs housing. RSHA waiting list has risen from 509 to 820 in 2005-06. Hopefully LHS, Community Care Housing Needs Study and Nat. Park housing needs assessment will give a clearer picture. Insufficient regard is had to rural housing needs. Here land supply is very constrained. Sustainability of communities requires that low - and average - income people can continue to live in them. There may be merit in identifying another 'rural centre' for concentrated development. For rural villages, existing policy is not working. Mixed tenure sites could be considered on a limited basis, with affordable housing (meaning rented) still being the primary purpose. Cautious response to SPP15 is understood, but there may be some prospect of delivering affordable housing outwith existing settlements. Further involvement of 'key players' is needed to explore delivery mechanisms for affordable rural housing.</p>
Bett Homes	174/1/1	<p>Support and endorse the representations made by Homes for Scotland. Welcome the aim of the Issues Paper to support growth. Support continuing importance of the Hillfoots corridor as an area of search for housing. This will allow Betts to continue their investment in this area. Support diversion of some of the pressure for growth from Stirling to Clackmannanshire. This will allow more rural settlements to benefit from planned growth. It should however be noted that a policy of restraint in Stirling will drive up house prices and reduce housing choice. The Plan should fully reflect and respond to the issue of market demand making provision in a range and choice of locations. Over reliance on urban capacity sites is a high risk strategy as not all of these sites may come forward. The method for assessing the sites is unclear. Concerned about the deliverability of small sites. We would request that the likelihood of such sites coming forward is clarified. The Structure Plan in light of SPP21 should adopt a flexible approach to Green belts and countryside. There is a significant amount of land currently allocated as Green belt which can provide a sustainable location for housing. Such sites may be the most sustainable in terms of the SEA process. We would therefore promote a review of Green Belt boundaries to identify the potential for long term growth areas. SPP7 on flooding highlights that land raising may be acceptable as part of a planned long term strategy in a structure plan context. Would wish to comment on further research proposed on the need for affordable housing in Stirling. In strategic terms it is important that sufficient land is set aside for affordable housing. Without a supply of suitable land affordable housing aspirations are unlikely to be delivered. The Plan must provide sufficient flexibility for additional greenfield land release to be brought forward early particularly in Stirling. Bett Homes would wish to be fully involved in the alteration process.</p>

Clackmannanshire and Stirling Structure Plan 3rd Alteration – Comments at Issues Stage

Commentator	Rep.No.	Comments
Kippendavie Consortium	184/1/1	<p>A strategic case for Dunblane is promoted as the existing Structure Plan led to only 50 houses being allocated through the first Local Plan alteration. At the inquiry into the first alteration the Council accepted the potential of some of the land at Kippendavie and that the release of further land should await a future review of the Structure Plan. The updated Structure Plan is required through Scottish Planning Policy to address the need for affordable housing. Dunblane is identified as having a shortfall in this context. As a minimum the Council has to address the 12 year land supply from 2008 and potentially the 20 year time frame. A table is included comparing the 2002 and 1996 household projections pointing to the scale of increase that the review will need to address. It is reasonable to expect Towns such as Dunblane to address some of this increase and to meet the established backlog in housing needs. Sufficient time has passed since the significant allocations of the previous Structure Plan to justify the release of further land. A strategic requirement identified for Stirling North will necessitate release of further land in Dunblane as the capacity of Bridge of Allan is constrained. Development on the Kippendavie Estate could take place without adversely affecting the towns setting. It could deliver 500 houses with 25% affordable housing, a single stream primary school with community facilities, a site for an enlarged health centre, a relocated Tesco and pedestrian linkage into the town generating a number of benefits for Dunblane and relieving town centre traffic congestion. There are no specific policy designations which constrain development in this locality. Detailed site appraisal information is submitted to demonstrate the suitability of the Kippendavie land.</p>
Tesco Stores Ltd	201/1/1	<p>Support for Option 3 in Shopping Topic Paper - 'Meet all Projected Needs' as growth in expenditure generally runs ahead of increases in floorspace. Options 1 and 2 are not practical propositions and would be likely to result in the Structure Plan area failing to attract important retail investment. Structure Plan should place greater emphasis on the importance of ensuring continued investment to enhance or replace existing retail facilities in order to provide centres and stores better suited to modern requirements and more capable of meeting the needs of communities. Replacement superstores in or adjacent to the city centre will function as part of and supportive of the city centre and ought to be designed to modern standards containing space for the sale of both convenience and comparison goods otherwise trade will 'leak' out of the area.</p>

Clackmannanshire and Stirling Structure Plan 3rd Alteration – Comments at Issues Stage

Commentator	Rep.No.	Comments
Taylor Woodrow	209/1/1	<p>The most up to date projections should be used as a starting point. Need does not cover choice or other factors in the housing market such as infrastructure delivery and affordable housing. An assessment of housing demand and the potential for inward migration should be undertaken. The revised PAN 38 supports consideration of economic development or market conditions. The Structure Plan does not address the requirements of SPP3, SPP17 and SPP21. An end date of 2028 should be adopted and the need for full replacement of the Plan should be considered.</p> <p>The Urban Capacity study approach is welcomed but SPP3 requires such sites be used as flexibility rather than the principle allocations. To suggest that such a high proportion will contribute to the land supply is not logical. The scale of these sites is not viable in terms of the delivery of planning gain required to deliver sustainable communities. Allocation of more land will assist in the delivery of affordable, well designed and sustainable new communities. Taylor Woodrow is confident completions of between 1250 and 1400 completions per year could be sustained. Stirling and Clackmannanshire are well placed to attract growth in a similar fashion to Falkirk and Fife. Growth fits with the national agenda of increasing population and reducing the average age. If growth is to be accommodated then a full landscape, visual, environmental impact analysis should be undertaken. A mix between concentration and dispersal is likely to best meet requirements. The Glasgow and Clyde Valley Structure Plan provides a good example of this approach identifying growth areas along with smaller greenfield land releases and urban capacity to meet any shortfall. The most suitable locations should be chosen, for example Cambusbarron to the West, Dunblane to the North and West Sauchenford to the East. Stirling and Clackmannanshire should be identified as separate market areas. The Clackmannanshire housing land supply is considered to lack effectiveness and should be rethought focusing on areas with a rail link and good communications. The ability of Dollar to meet demand for executive housing should also be considered.</p> <p>For the rural area some private housing should be allowed in newly defined rural centres and in the National Park. A full review of housing needs in Stirling should be carried out to establish how much affordable housing is required and how much private sector housing is required to deliver it. The current methodology does not provide enough linkages between the assessed housing need and a spatial development strategy. Affordable housing should be provided where the need is identified (PAN 74).</p>
VICO Properties (Scotland) Ltd	213/1/1	<p>Retail capacity exists in Stirling particularly given the removal of major retailing at Forthside (Proposal SP2 requires alteration). Limited availability of suitable sites for retail development within Stirling city centre, additional edge of centre sites require to be identified to reduce expenditure leakage. More flexible policies are required with Edge of Centre locations playing a key role in addressing both quantitative and qualitative deficiencies in retail provision and providing sites for retailers who are otherwise unable to move to Stirling. Currently pursuing an edge of centre site for retailing.</p>

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Commentator	Rep.No.	Comments
Myra Allan	225/1/1	The potential shortfall of 1327 dwellings should be met by releasing a number of sites. Fallin and Cowie are better placed than Plean, which is too close to Durieshill. Bandeath Farm was assessed favourably by the Durieshill Reporter compared to other sites. Although the site's capacity has not been evaluated it could reach the 500 units required to provide a primary school. The SP review is supported and the Council should adopt a strategy of greenfield additions to the eastern villages, particularly Fallin.
Composite Energy	241/1/1	Company holds DTI exploration and development licence for extraction of coal bed methane over Plan area and neighbouring areas. Minerals section of Alteration should recognise the natural gas resource in deep lying coal strata and Policy should support extraction and distribution, subject to avoidance of adverse environmental impacts.
Sears Property Group Ltd	245/1/1	<p>The approach to meeting some of Stirling's housing needs in Clackmannanshire is flawed and contrary to SPP3 which states that requirements should be met within the Housing Market Area (HMA). The analysis of migration does not include information on flows from Stirling to Clackmannanshire. A restrained approach in Stirling with growth in Clackmannanshire is not sustainable. Stirling is avoiding the need to plan for growth in its administrative area. The concept of a shared HMA is flawed in seeking to deliver affordable housing outwith the area in which the need originates, contrary to PAN 74. Diverting requirements to Clackmannanshire will lead to less sustainable patterns of travel contrary to SPP17 and PAN75.</p> <p>Reliance on urban capacity sites is questioned. The critical issue will be the effectiveness of this supply. The sources of this supply need to be detailed on a settlement basis. The Plan needs to account for SPP21 on Green belts. Green Belts should be reviewed and there is a need to ensure that the inner boundary is not drawn too tightly. This will require adjustment of the settlement strategy. The thresholds for delivery of Infrastructure are too low and the lead in times for such delivery are long. This should be factored into the Structure Plan. The land requirement should be reconsidered placing less reliance on urban capacity sites or on moving people currently resident in Stirling into Clackmannanshire. A restrained approach on environmental grounds is not justified given that the recent Inquiry demonstrated there are a number of sites suitable for development including Pleanbank farm. A more realistic and flexible strategy is required identifying further growth in East Stirling, recognising the potential of Pleanbank farm.</p>

Clackmannanshire and Stirling Structure Plan 3rd Alteration – Comments at Issues Stage

Commentator	Rep.No.	Comments
Warren Consultants	265/1/1	<p>There is no mention of the housing pressures being placed on rural villages such as Drymen, Balfron, Kilearn and Fintry. More housing land should be made available in rural areas to cope with these pressures. Housing pressures in the Southwest region should be recognised in order to meet local housing needs. A more flexible and innovative approach to affordable housing supply is needed, especially in rural areas. Allowing private landlords to deliver affordable housing could be a possibility for meeting the shortfall. There is concern that the shortfall in residential land in Stirling will be met in the Clackmannanshire area, thus doing little to alleviate housing pressure in the West.</p>
Taylor Woodrow	280/1/1	<p>The issues paper focuses on quantitative issues. Full consideration of a spatial strategy should follow in the coming months. In setting a new agenda for Stirling a starting point should be to "Grow the City". Unclear as to whether any of the options address this in any real sense. Question the change in approach towards a shared housing market area. There has been no assessment of the deliverability of the urban capacity sites. A higher growth projection might address issues relating to higher growth rates being achieved in Falkirk, Fife and West Lothian. The assessment presented in the Issues paper is not informed by any qualitative assessment and Taylor Woodrow would wish to discuss how this will be addressed, along with the growth or no growth choices and a review of anticipated completions. Further analysis of sasines returns should also be undertaken to inform the final assessment of housing needs highlighting where specific shortages may exist. Wish to consider a Housing Choices review to seek to determine what the forces for change might be. Need to avoid overdependence on meeting Stirling's housing needs in Clackmannanshire if the requirements of SPP3 are to be met. Need to consider the quantification of mobile demand.</p> <p>In terms of the various options Option 1 raises delivery issues and both options 1 and 2 place over reliance on untested urban capacity sites. Option 3 places heavy reliance on Clackmannanshire. Option 4 implies that some 2000 of Stirling's Housing Needs would be met in Clackmannanshire. The potential for this area to absorb this level of growth and the lead in times for infrastructure provision are questioned. Option 5 where each Council meets its own needs better reflects SPP3 and should not be discounted. Suggest Clackmannanshire could still promote growth for regeneration in a similar fashion to Falkirk. The council should be adopting a more proactive review of Green Belt and other designations looking at capacity to absorb growth in the long term.</p> <p>Options for strategic development are identified at Cambusbarron. Work is currently being undertaken on options for addressing schools capacity issues. It is unfortunate that the recent Schools PPP approach has not addressed issues of future capacity but work has been commissioned by our clients to address these issues and a comprehensive submission on this will be made to Stirling council in due course. It is imagined that the Council will be reluctant to consider a further major growth area and that small scale growth will not deliver the required infrastructure. The specific option at Cambusbarron identified in three parcels could deliver up to 400 units, a primary school, community centre and other ancillary facilities. This option would be deliverable and could be taken forward with considerable certainty through the forthcoming strategic options exercise. A separate document "Analysis and Development Option" was submitted in May 2006 outlining the location of these proposals.</p>

Clackmannanshire and Stirling Structure Plan 3rd Alteration – Comments at Issues Stage

Commentator	Rep.No.	Comments
Walker Group	281/1/1	<p>Question the evidence to support such a substantial increase in reliance on urban capacity (windfall) sites. This ignores the need to provide for a range and choice of housing quality, particularly in Clackmannanshire. A suitable safety net would be required should these sites fail to deliver. The windfall figure for Clackmannanshire has increased from 285 units to over 2000. No account is taken of demand. Option 4 is supported as it plans for the whole requirement and allows for additional growth in Clacks east which is undoubtedly a key strategic location.</p>
Walker Group	281/1/1	<p>While the Walker Group is fully committed to providing an appropriate level of employment land within the MGA (in accordance with development plan policy), it would question whether this is supported by the current development plan policy context. The Stirling Business Space Strategy suggests that there is an urgent need to identify new future high quality employment land and locations in Stirling, which may have to include greenfield sites in order to meet anticipated future demand and current demonstrable land for owner occupied business space. Although it is entirely proper for the Structure Plan to address this, the study does not recommend a specific requirement for 10 ha of employment land within the MGA as set out and supported in the development plan as it currently stands. Walker Group cannot be expected to accommodate additional strategic employment land requirements that have arisen from new survey and analysis work carried out when the previous structure and local plans were promoted.</p> <p>Approved Structure Plan Proposal EDP2: New Strategic Employment Sites makes provision for new sites in a number of areas including Bannockburn Interchange / Corbiewood area – there is no clear suggestion that this should be interpreted to refer to the MGA. In Proposal HP3 there also is no absolute requirement that the MGA needs to include strategic employment land, as accessibility to a strategic site is an alternative option ie. Bannockburn Interchange / Corbiewood.</p> <p>The first Alteration to the Stirling Council Local Plan principally updated policies and proposals for new housing and employment land. While there is reference to scope for strategic employment development at Corbiewood, there is nothing in the policy to suggest that there should be a strategic employment element at the proposed MGA.</p> <p>Alteration 2 to the Stirling Council Local Plan relating to the MGA is at an advanced stage and it will therefore be important that the policies contained therein are fully enshrined within the emerging Structure Plan policy. To do otherwise would be to ignore the primacy of the development plan enshrined in Scottish Executive planning policy. Within Alteration 2, the key principles of the proposed MGA confirm that there should be an optimisation of employment opportunities “for everyone in the village and neighbouring communities”. There is no suggestion that these employment opportunities should be at a strategic scale. Although Policy MGH3 requires a mix of employment opportunities, and where demand is demonstrated, a serviced business park, there is no cross-reference to the other development plan policies on strategic employment land requirements. The village schematic within the Design Guidelines document does not specifically set aside an area for employment uses. Any new requirement for a strategic employment land allocation within this location will need to be the subject of an exercise to identify a suitable extension to the MGA or an alternative site – this stance should be reflected in the Structure Plan Alteration.</p>

Clackmannanshire and Stirling Structure Plan 3rd Alteration – Comments at Issues Stage

Commentator	Rep.No.	Comments
Walker Group	281/1/1	<p>In terms of retailing welcome the recognised need for additional capacity. This capacity should be utilised to support the development of the MGA and in turn enhance accessibility to convenience shopping for residents in Plean, Cowie and Bannockburn. The proposed new village centre within the MGA should be afforded 'town centre' status and be fully incorporated into the network of centres that is required to be identified by SPP8 and emerging Structure Plan policy. This would then convey policy support for the safeguarding of the village centre and in appropriate circumstances its further development.</p> <p>The provision for a new local supermarket within the MGA (up to 2,500 sq.m) was not included within the Stirling Retail Capacity Study's assessment of potentially available convenience floorspace. For the period 2010–2015 additional spare convenience capacity is identified and a new supermarket (c.4000 sq.m) in the Bannockburn area, also to serve the MGA, is suggested. Although the study states that a location close to A91 would allow good accessibility, it ignores the fact that a location close to the A91 would not be within or adjacent to Bannockburn Village Centre. It is essential that the proposed MGA village centre allocation is safeguarded from competition from locations with less planning merit - in locational terms, a new store at Durieshill is preferred in terms of SPP8. The new Structure Plan should acknowledge the 2,500 sq.m allocation within the MGA as both a new centre and revise the capacity assessment accordingly - a new store of 4,000 sq.m at Bannockburn can no longer be justified in capacity terms given the development plan support for the MGA. A minimum 2,500 sq.m allocation will be the minimum size of new store required to attract operator interest and most operators would currently prefer stores of a larger size even where these are seen as serving a local catchment.</p> <p>Clarity is also sought on whether the 'up to 2,500 sq.m' floorspace supermarket allocation at the MGA is net or gross. If it follows Policy S4 of the Structure Plan it can be regarded as a net figure.</p>

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Commentator	Rep.No.	Comments
LXB Properties	318/1/1	<p>Stirling City Centre should maintain and enhance its role as a regional retail centre while Alloa should be the focus of providing sub-regional support to alleviate infrastructure strain caused due to popularity of Stirling as a retail destination. Stirling must be able to provide modern retailing with the type of space retailers require. Edge of centre locations useful to cater for such demand however would strain transport infrastructure. Do not see any reason for expanding the Stirling City Centre boundary. Greater emphasis therefore on out of centre locations rather than edge of centre.</p> <p>A more holistic approach to redevelopment required in Alloa which links convenience retailing with core shopping.</p> <p>Raploch is not a viable retail location for any of the current retailers who would be seeking space and would require significant improvements before a sufficient critical mass of retailers would be prepared to consider it as a location. The focus of future out of town retailing should be focused on Springkerse. A 'drip' feed of allocation may be the best policy to avoid short-term over-supply. SP needs to consider accommodating specific tenants at Springkerse as special dispensations by issuing personal consents or ensuring dual representation to prevent leakage.</p> <p>Stirling and Alloa are not suffering as a result of the out of town competition at Sterling Mills and Village. Alloa's decline as a retail location is a result of a lack of flexible good quality and attractive retail space which is something Stirling has always been able to offer. Alloa requires considerable re-planning as a town centre and there should be greater emphasis on repositioning of the centre and boundaries redrawn thereafter.</p> <p>The existing retail hierarchy does not require to be altered. Problems in planning long-term for retail - such 'crystal ball glazing' may prove very inflexible for emerging forms of retail - suggest planning for growth should be left sufficiently open to embrace the ideas of future retailing formats.</p> <p>Retain existing shopping hierarchy and sequential approach however this statement should be held hand in hand with the statement that no additional retailing beyond that which is planned for should be allowed. The constrained approach based upon the existing hierarchy will not be interpreted sufficiently enough to allow flexibility for developers to meet the needs of the retailer at a given point of time. Suggest identify projected future retail need accompanied by improved retail distribution and such need to have flexibility attached to it. Suspect options 3 and 4 with addition of the word 'flexibility' would prove to be the hybrid which you proposed at option 5.</p> <p>Desirable for promotion of appropriate shopping centres in rural area with specific attention to their role and function however reservations as to how rural centres could be sufficiently maintained over the long-term in today's retail environment. Certain centres survive because of local loyalty to certain brands eg. Co-op. With the emergence of large unit convenience retailing these centres will continue to suffer and the impact will be felt at local level when the time comes for such local shops are no longer able to function profitably.</p>

Clackmannanshire and Stirling Structure Plan 3rd Alteration – Comments at Issues Stage

Commentator	Rep.No.	Comments
Caroline Paterson	335/1/1	Consider that the Carse at the foot of the Ochils around Manor Powis should be designated as Green Belt. This was supported through the Local Plan Second Alteration and we are greatly concerned that this area should be protected. I am currently working to protect this area from Pylons which have landscape and health impacts but the effects of other developments would also be significant and long lasting. I would therefore urge the Council to seriously reconsider the Green belt designation for these fields in the forthcoming Structure Plan Review.
Mactaggart & Mickel Ltd	399/1/1	Agree that in planning large scale new housing affordable housing should be an objective irrespective of the numerical need for new housing. It would be wrong to suggest that some of the housing need might be met in Clackmannanshire. Areas such as Dunblane should be targeted where demand for housing and affordable housing is high. It is important that larger schemes should include a significant proportion of affordable housing as in Edinburgh. Reference is made to a Manchester study (1973) which included a quantitative and qualitative analysis of new housing requirements. PAN 38 requires marketing to be taken into account but there is little evidence of this. Planning is for people and providing a range and choice is important. Agree it is important to prioritise sustainable development and this should take account of SPP21 to consider the most sustainable long term pattern of growth.
KW Properties	404/1/1	Support for approach and findings of background reports. Considers requirements for additional economic, retail and housing land are addressed through Alteration process as this is the first alteration to the Structure Plan that has allowed for a review of these land use requirements beyond the current plan period. Also important that the review considers the implications of accommodating these uses and existing Green Belt designations.

Clackmannanshire and Stirling Structure Plan 3rd Alteration – Comments at Issues Stage

Commentator	Rep.No.	Comments
LXB Properties	318/1/1	<p>Stirling City Centre should maintain and enhance its role as a regional retail centre while Alloa should be the focus of providing sub-regional support to alleviate infrastructure strain caused due to popularity of Stirling as a retail destination. Stirling must be able to provide modern retailing with the type of space retailers require. Edge of centre locations useful to cater for such demand however would strain transport infrastructure. Do not see any reason for expanding the Stirling City Centre boundary. Greater emphasis therefore on out of centre locations rather than edge of centre.</p> <p>A more holistic approach to redevelopment required in Alloa which links convenience retailing with core shopping.</p> <p>Raploch is not a viable retail location for any of the current retailers who would be seeking space and would require significant improvements before a sufficient critical mass of retailers would be prepared to consider it as a location. The focus of future out of town retailing should be focused on Springkerse. A 'drip' feed of allocation may be the best policy to avoid short-term over-supply. SP needs to consider accommodating specific tenants at Springkerse as special dispensations by issuing personal consents or ensuring dual representation to prevent leakage.</p> <p>Stirling and Alloa are not suffering as a result of the out of town competition at Sterling Mills and Village. Alloa's decline as a retail location is a result of a lack of flexible good quality and attractive retail space which is something Stirling has always been able to offer. Alloa requires considerable re-planning as a town centre and there should be greater emphasis on repositioning of the centre and boundaries redrawn thereafter.</p> <p>The existing retail hierarchy does not require to be altered. Problems in planning long-term for retail - such 'crystal ball glazing' may prove very inflexible for emerging forms of retail - suggest planning for growth should be left sufficiently open to embrace the ideas of future retailing formats.</p> <p>Retain existing shopping hierarchy and sequential approach however this statement should be held hand in hand with the statement that no additional retailing beyond that which is planned for should be allowed. The constrained approach based upon the existing hierarchy will not be interpreted sufficiently enough to allow flexibility for developers to meet the needs of the retailer at a given point of time. Suggest identify projected future retail need accompanied by improved retail distribution and such need to have flexibility attached to it. Suspect options 3 and 4 with addition of the word 'flexibility' would prove to be the hybrid which you proposed at option 5.</p> <p>Desirable for promotion of appropriate shopping centres in rural area with specific attention to their role and function however reservations as to how rural centres could be sufficiently maintained over the long-term in today's retail environment. Certain centres survive because of local loyalty to certain brands eg. Co-op. With the emergence of large unit convenience retailing these centres will continue to suffer and the impact will be felt at local level when the time comes for such local shops are no longer able to function profitably.</p>

Structure Plan 3rd Alteration – Issues Stage
Summary of Urban Community Workshop (Stirling)
13th June 2006, Viewforth, Stirling Council

Attendees:

People were disappointed there was not a higher turnout. Although there was a scheduling clash with a Community Forum meeting in Cambusbarron, the following Community Council's were represented: -

Susan Ridler - Torbrex	James McGrory - Craigs
Andrew Logan - Logie	Wilma Comrie - Community Service
Keith Henry - Broomridge	Gordon Gray - Craigs
Mary McKinley - Raploch	Terence O'Byrne - Dunblane
Selina Makower - Logie	

Stirling Council Officers in attendance were Peter Morgan, Andrew Henderson, Allison Scambler.

Comments Made:

- Agreed that the consultation deadline should extend to the 16th July and that the Issues report should be sent out with a reminder letter.
- There was discussion about retailing and a desire that Stirling should not go down the route of Inverness where out of town shopping was having a real effect on the town centre.
- Some discussion about extension of the town centre, the existing Tesco site, Burghmuir etc.
- Agreed concerns re population mix and balance and that we did not want to have an ageing population, that maybe housing was a necessary evil. Questioned at what stage in the process it would be clear where new development would actually go.
- People felt these were important issues that it was difficult to take a view on at this stage as there were so many things to consider. There was discussion on schools, water and drainage and the need for larger land releases that would pay for the necessary infrastructure.
- People felt it was preferable to release urban capacity sites in preference to Green field land. Unsure why the new village would not meet long term needs.
- Concern that all green space in the city would be lost.
- Questions were asked about planning for jobs and how a greater mix of job opportunities would be achieved.
- Health care provision was also felt to be an issue and Dunblane has been struggling to achieve a new surgery for some time. Community Planning would be important in this respect.
- Some discussion about another workshop for all community councils but explained this was an early stage in the process and historically difficult to get people to engage with the Structure Plan.

Summary of Rural Community (Stirling) Workshop

4th July 2006, Blairdrummond Community Hall

Attendees:

15 Community Council representatives from Callander, Thornhill, Fintry, Strathfillan, Drymen, Strathblane, Trossachs and Strathard Community Councils.

Questions Raised & Comments Made:

- Who are the in-migrants?
- Are population projections accurate?
- In-migrants push up house prices.
- 'Public' housing has waiting lists – why not private sector housing?
- Affordable housing can only be provided by cross-subsidy from private sector development – need to change the rules.
- National Park policies are too restrictive
- Where does Council housing come in?
- What is definition of affordable housing?
- Demographic stats are set by Scottish Exec.
- Household size is going down but size of new houses is not.
- Developers should provide infrastructure
- Is the 'growth' sustainable if it does not come with jobs? – it seems to be just for commuters
- Particular development pressures on Drymen
- Each community should determine its own needs
- No replacement for the long-lost SDA as means of providing development sites
- Workers will not come if there is no house to move to
- Development allocation creates land value but return to community ('planning gain') is not commensurate
- Why change proportion of affordable housing from site to site (Callander examples)
- Older people in large houses cannot afford to move to smaller houses
- What is the effect of higher rate of house-building in Clackmannanshire?
- National Park is undemocratic
- Park is not an infrastructure provider so how can it plan ahead
- Local need cannot influence RSHA waiting lists/allocations
- How do you determine how large a community should be?
- Need to attract people to places to support communities – e.g. families with school-age children
- Second homes and tourist rentals add to availability/affordability problems (eg all Water Board houses went to tourist use); more significant in smaller communities but also affects larger villages
- Perthshire approach only delivers big houses
- Can planners control size of new houses?
- Design quality is not good – both design of individual developments and overall visual impact of new growth needs to be considered
- Have planners done an 'audit' of water supply and drainage infrastructure position?
- Further consultation should take into account up-coming Community Council election period
- This is not a proper consultation because communities have not set the questions

Summary of Housing Workshop
11th July 2006, Stirling Council, Viewforth, Stirling

Attendees:

Alston Birnie, King Homes	Carolynne Sutherland, Stewart Milne
Graham Patrick, Walker Group	John MacCallum, Redrow Homes
Donald McLean, Walker Group	Gordon Patterson, Communities Scotland
Bob Moyes, Ogilvie Homes	Patricia Profili, Cala Homes
Derek West, Elphinstone	Tony Teasdale, Rural Stirling Housing Association
Anne Dalziel, Stirling Council	Peter Pearson, Rural Stirling Housing Association
Anne Matthew, Forth Housing Association	Richard Holland, Taylor Woodrow

Officers in attendance were: -

Allison Scambler, Greig Calder, Dave Thorogood (Stirling Council)
 Kate Fleming, Graeme Finlay (Clackmannanshire Council)

(1) Question Time: Points raised:

- UCS – All sites potentially OK for housing, but Councils now relying for 50% of supply on brownfield as opposed to 35% now.
- What relation 'housing plan' (= LHS)?
- Be site-specific re affordable housing requirements. Need to be clearer on programming. Ref. to Strategic Housing Investment Framework.
- Market issues i.e. Restricting supply reduces opportunities for affordable housing and also ups its cost/price.
- What is the political context? 'Going for growth' a la Falkirk works.
- How much of the apparent change in trend 2002 – 2004 is due to restriction of supply in Stirling?
- If LAs are competing for growth will the Exec get around to doing something about it – eg in review of NPF?
- Will local elections affect outcomes? Should Councils be doing a Structure Plan review at all at this time?

(2) 'Workshop' sessions :

Group A - Bob Moyes, Alston Birnie, Tony Teasdale, Donald McLean, Patricia Profili

- Q1 Do not use 2004 projections. Availability of greenfield does not inhibit uptake of brownfield. Councils need to deliver brownfield sites to the market. The Councils should appreciate the 'business case' for promoting housebuilding – attracts new people but also the very activity supports the local economy.
- Q2 Market should decide on basis of demand. With no short term allocations there is a danger of a gap before the MGA starts to deliver, and with no new allocations how is affordable housing to be achieved? Developers consider that the slow-down in Stirling completions was due to a failure to agree delivery formula for affordable housing contributions. The nil land value element is disliked – there should be national guidelines.
- Q3 It is up to the Councils to demonstrate the feasibility of the urban capacity sites (e.g. South Alloa has been around a long time).
- Q4 The higher (highest) figure.

- Q5 A place for both approaches.
- Q6 Locations have to offer choice and affordability as well as fitting with infrastructure. MGA will be competing with Falkirk.
- Q7 Any or all of these. Growth opportunity at 'Bridgehead' – but some debate as to reality of increased accessibility. What Clackmannanshire needs is more up-market housing to help change economic profile.
- Q8 Divide in policy between Rural Centres and other villages is not always helpful – and is not working, e.g. not delivering affordable unites. Not possible to have a 'one size fits all' policy for developments in, or expansions of, villages. RSHA waiting list exceeds 800.
- Q9 Looking for clarity on how affordable requirement is assessed, and private sector and Housing Association want a role in this.
- Q10 (*Ran out of time*)

Group B - RSHA, Communities Scotland, and house builders

- The session opened with an open question posed by a developer about whether the Councillors have decided to go ahead with an Alteration. It was explained that to not go ahead was an option before us. However, it has been formally decided and political authority given to prepare a Consultative Draft for Alteration 3.
- Q1 To follow anything other than the trends would be difficult to reconcile especially since the Council (Stirling) has argued in the past on the need and relevance of meeting the latest projected housing requirement. If it is decided to deviate from the latest trends for more growth then a justifiable case is needed and especially it would be necessary to demonstrate any case for more growth. The group reckoned this might prove difficult and perhaps most likely not justifiable. However, in approaching a strategy for growth then need to (a) provide monitoring data that measures if the Structure Plan is working e.g. enabling good new build rates, influencing investment etc.. (b) need to evaluate and demonstrate "demand" factors (c) need to provide argument for supply led approach and its likely effectiveness. Perhaps a full Structure Plan review is required. This was partly a rhetorical question in that it is not considered justifiable at this juncture.
- Q2 Not adequate to provide for strategic requirement entirely through the UCS sites. Several remarks ensued around the greenfield release / brownfield agendas and concluded on several different points (a) too heavy a reliance on brownfield would likely prove unviable for developers and would be difficult to deliver due to lead in times and mitigation requirements and costs (b) providing affordable housing from difficult to develop sites can prove problematic and too costly (c) phasing of sites and their related effectiveness would probably mean that a balance of sources of land and sites is required i.e. brownfield / greenfield (d) perhaps many brownfield sites are not effective and unlikely to become effective in the Plan period. The suggested timeframe for the Alteration 3 could prove a constraint to delivery in the sense that it depends on precisely when sites can become "effective". Linked to this the related timeframe for the Structure Plan coming on stream may also be a constraint to development i.e. the position is continually changing and with the advent of changes to the planning system and supply / demand cycles and associated patterns raises questions on the overall context for Alteration 3.
- Q3 & 4 Delegates were not specifically aware of the detailed circumstances and scale of housing requirement for Clacks/Stirling to comment. But they referred back to the earlier point about reasoned justification being required.

Q5 & 7 The group considered a combination of approaches across the SP area is essential in order to deliver the Plan. This also cross refers to Question 7 below in that it was considered entirely feasible for the new bridge over the forth at Kincardine and the reopening of the SAK railway to lead to a strategy to include a growth point at the Bridgehead area. Also it was mentioned that the provision and improvement to transport infrastructure should influence key location decisions. This might relate to both new sites within the core areas and growth points (not MGAs') i.e. growth below MGA level e.g. 100 / 250 / 500. It is maintained at this juncture there cannot be justification for any new MGA anywhere in the Structure Plan area, i.e. in considering the latest Scottish Executive projections (2004).

Q8 –10 Affordability and how to provide for housing in rural areas is a key issue. The group did not bottom out their views but agreed that SPP15 warrants changes and not least the existing lack of any coherent strategy for housing in rural areas requires attention. It was suggested though that perhaps we ought to designate some new “rural centres” that could be expanded in accord with SPP15 i.e. less contentious locations for new build (politically). It is an option warranting consideration. Delegates agreed with the principle of providing affordable housing but questioned how best to do so. It is mainly on the deliverability of affordable housing. Any strategy must allow for this to be enabled in agreement with the building industry. It was stressed that it can be difficult to enable affordable housing as part of brownfield development and so a balance of greenfield release is required. Regrettably could not focus sufficient time to conclude things but should maintain a starting point for dialogue between stakeholders is reached and this ought to be followed up on. (N.B. beyond this workshop Clackmannanshire Council planners are to meet with Housing Strategy Team probably beginning of September, holiday period and all that, to discuss – affordable housing and housing needs)

- Perhaps the National Park ought to have its own special planning policy framework ? Recognised that there are specifics for the NP area and the group maintained the NP should be duly protected and promoted. This includes for how to provide for affordable housing there.

Transportation:

- Not included in the set of questions but generally stated the strong commuting patterns across the Structure Plan area and to other parts of the Central Belt warrants full assessment and consideration on what form of policy intervention is necessary or appropriate. The Structure plan area has potential for good accessibility to sustainable forms of transport and not too much reliance on the private car.

Group C - “Group 3”

Q1 It was felt that the 2004 figures should be used, however if there was concern over their accuracy then they should be used with caution.

Q3 There was some concern over the reliance on 50% of the sites identified being within the Urban Capacity Study, rather than being actual programmed sites. It was considered that the Urban Capacity Study should be regularly reviewed in consultation with other key stakeholders.

Q5 The location of housing should be closely linked to the location of employment sites.

Q6 Areas which were well served by rail should be exploited more, e.g. Dunblane and Bridge of Allan, as well as areas which will be served in future, e.g. Alloa. The housebuilders felt that Green Belt areas should not be dismissed out of hand and that, in some cases, they may represent better development sites than other non-Green Belt sites.

Q7 Clackmannanshire could plan for growth in its own right, rather than potentially be reliant on any surplus/overflow/mobile demand from Stirling. The Bridgehead area in

Clackmannanshire would be a logical area to look at in terms of development because of its close proximity to the new upper Forth crossing and the Stirling Alloa Kincardine rail link.

- Q8 It was considered that the strategy for the rural area needed a fairly comprehensive review, although no specific points were raised.
- Q10 It was considered that restricting sites to development only for affordable housing was not really working and there was a desire to see a move to mixed sites with both affordable and mainstream housing.
- There was a query over whether the migration from Stirling to Clackmannanshire was because of a lack of opportunities. If people were effectively being pushed out of Stirling because of this, was it sustainable?

Summary of Environment Workshop
12th July 2006, Greenfield, Clackmannanshire Council, Alloa

Attendees:

Jennifer Craig (SEA Officer), Historic Scotland
Zoe Kemp (Planning Adviser), SNH
Ross Johnston (Operations Manager), SNH
Catherine Reid (EPI team), SEPA
Sofia Billet (Senior Planner, SEA, SE Scotland), SEPA
Chris Wilcock (Development Liaison Manager), Scottish Water

Officers in attendance were: -

Stirling Council - Allison Scambler, Dave Thorogood, Chris Waddell (Biodiversity), Joy Barry (SEA)

Clackmannanshire Council - Graeme Finlay, Ronnie Beveridge, Gordon Roger (Sustainability)

Agenda

- 1) Introduction and summary of scope of Plan review
- 2) Plan: *Caring for the Environment* chapter:
 - Nature Conservation –
 - Policy
 - Compatibility with Habitats Directive
 - Promotion of Biodiversity
 - Conservation outcomes through Environmental Enhancement
 - Green Belts
 - National Park issues
 - Water Resources Management –
 - Flooding issues
 - River Basin Management Plan process and the Structure Plan
 - Minerals
 - Waste Management
- 3) Plan: Environmental implications of potential development scenarios:
 - Range of options for planning purposes
 - Infrastructure issues
 - SPP 15 – Rural development
 - Agencies' concerns – opportunities and problems
- 4) SEA
 - Scoping Report – outcome of Consultation Authorities' considerations
 - Next steps - assessments
- 5) AOCB Any other relevant issues those present wish to raise

Feedback: (= briefing paper with comments inserted in italics)

Environment workshop : Part 1 – The general environmental issues

Nature conservation :

Issues - 1 – Compatibility with the Habitats Directive

Q1 – Should we introduce a separate Policy to cope with the complexities of ‘appropriate assessment’ re Natura sites, and ensuring that follow on Local Plans or LDFs incorporate these principles?

Basically, yes. Councils should look at ‘model policies’ from the Executive.

2 – Promotion of Biodiversity

Q2 - What is appropriate in a Structure Plan? Is enhanced Pol ENV5 sufficient?

ENV1 should contain a strategic statement on biodiversity; perhaps reference to Scottish Biodiversity Strategy.

ENV5 could be strengthened; perhaps refer to a planning gain approach more generally.

Reference to Ancient & semi-natural woodlands.

Plan does not have a ‘layer’ of local wildlife sites.

Green Belts :

Issues - 3 – Any reason to change Green Belts

Q3 - Should Green Belts be in ‘area of search’ for new housing/business developments or should there be a full review first?

Green Belt incursions will need proper justification based on analysis. Desirable to carry out wider landscape capacity study.

Are our Green Belts sustainable over 20 yrs?(SPP21)

Countryside Management :

Issues - 4 – Relationship of Structure Plan policies to National Park

Q4 - Should the Park be identified as a separate policy area in the Locational Framework?

ENVP2 needs replacing whatever is done. Have Councils sought Scot. Exec’s view on hiving off the Park from rural area for policy purposes?

Water Resources Management :

Issues - 5 – Flooding

Q5 - Is flood risk dealt with adequately in the Structure Plan ? Should Key diagram give more information?

Include commitment to sustainable flood management. Unlikely that Key Diagram can convey more info.

SEPA – 2nd gen. Flood risk maps due out in ‘autumn’.

6 – River Basin Management Plans

Q6 - How can a Structure Plan best support the River Basin Management Plan process?

Include policy commitment in ENV9 – maintaining water quality status of water bodies.

7 – Water and drainage infrastructure

Q7 - How can the Structure Plan best reflect the constraints and opportunities represented by water and drainage networks?

SW – Policy of SW is now not to object to development proposals but to try to tailor investment to cope. But they cannot commit investment until the development has at least outline planning consent. Also there is some ‘flexibility’ on existing drainage infrastructure because they have agreed with SEPA some relaxations of discharge standards. SNH & Councils queried how this fitted with:

(a) – the long term development planning process

(b) – protection of Natura rivers

Minerals planning :

Issues - 8 – Minerals

Q8 - Are existing policies (ENV10, 11, 12) adequate, or do they require significant alteration?

ENV11(1) is not ‘Natura’ – compliant.

ENV12(3) - SEPA pointed out that Peat is wetland and therefore subject to WEWS Act.

Increased emphasis on design, leading to greater use and demand for dressed stone for construction.

Still some interest in opencast working of coal in Clackmannanshire but seems unlikely to be achieved.

Do we still have a 10 – yr land bank of aggregates as per previous Structure Plan background study?

Waste management :

Issues - 9 – Waste planning

Q9 - Is modifying ENV13 to take account of the Area Waste Plan sufficient?

Q10 - How can the Structure Plan best support the Area Waste Plan?

Possibly emphasise a presumption against landfill for municipal waste.

Environment workshop : Part 2 – The environmental impacts & opportunities associated with the range of development scenarios

SNH questioned whether, given the changing political, legislative and administrative context likely to characterise the Structure Plan period, is the exercise worth doing just now.

SNH also made the point that development ‘capacity’ has to be considered across a wide range of factors adding up to sustainability – it is not just visual or infrastructure capacity.

The development options are housing – based. While there may be some proposals for additional or relocated business land independent of housing growth options, the basic principle will be co-location of business and commercial property with bulk of housing. Impacts associated with new development will therefore largely depend on choice of housing scenario and its locational options.

<i>Strategic housing options:</i>	
1	Baseline = Urban capacity and windfalls

2	Baseline + some greenfield to enable infrastructure
3	Baseline + 2002 projected growth (shared market area)
4	As 3 + growth allowance for Clackmannanshire
5	As 4 but no shared market (ie Stirling c.3375)

Options 1 – 5 represent increasing levels of greenfield expansion over and above remaining Local Plan sites and Stirling's Major Growth Area.

Given the infrastructure constraints, Option 5 is probably tending towards one or more new villages and/or significant Green Belt releases.

Q The locational options will still be expressed in terms of the established Locational Framework. Are there environmental advantages/disadvantages re Stirling E, W, N, Tullibody/Alloa, etc?

All acknowledged that it was difficult to comment on growth scenarios without some locational guidance. SNH noted potential influence on latter of climate change/sea level rise/flood risk.

SEPA noted that WEWS and CARS should cover the potential water quality impacts, so landscape may be the overriding environmental issue.

SNH questioned how AGLV will figure as a policy tool – hint that review in line with their recent guidance would be appropriate.

Rural Development :

All the above Options will be associated with an element of housing (and other development) 'allocated' to the Rural areas. Councils have to consider how far to embrace SPP15 – e.g. :-

Compare to SPP15	Options : Alone or in combination	Affected SP Policies & Proposals :
<ul style="list-style-type: none"> Whether there should be more opportunities to permit house-building in the rural areas If so to what scale 	<ul style="list-style-type: none"> Expand existing 'clusters'; Loosen criteria for farm conversions; Identify more small settlements as 'villages'; Allow greenfield expansions of existing villages; 'Affordable' only <i>per</i> LHS; A proportion of general needs; 	<p>H4, H5, H6</p> <p>Proposals HP1/HP2</p>
<ul style="list-style-type: none"> Whether the Plan gives sufficient support to rural economic development and diversification 	<ul style="list-style-type: none"> Identify additional sites for employment use; Reconsider use of rural 'brownfield' sites; Reconsider whether economic development needs to be rural activity - linked; Permit cross-subsidy of employment development by income from housing; 	<p>ED2, ED4</p>
<ul style="list-style-type: none"> Whether the Plan contains an appropriate policy framework for assessing tourism-related development proposals 	<ul style="list-style-type: none"> Permit more developments outwith settlements; Permit more recreation developments with tourism element; 	<p>T1</p>
<ul style="list-style-type: none"> Whether adjustment of any of these development policies may 	<ul style="list-style-type: none"> Strict design criteria; Ensure 'appropriate' rural 	<p>ENV3, ENV5</p>

require additional environmental safeguards	development drives environmental enhancement	
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Q Are there particular environmental or infrastructure implications associated with these options?

Q Is dispersed rural development 'sustainable'?

Rural development on any scale may bring more issues of 'appropriate assessment' under the Habitats Directive – given the distribution of Natura sites.

It will also raise more problems of creating drainage infrastructure to service it.

SEPA has a draft policy on dispersed drainage in non-sewered areas. They are not keen on proliferation of septic tanks and soakaways – again under WEWS these impact on groundwater quality.

SW has a protocol with SEPA to enable WWTWs to operate outwith existing licences if this will enable development and an upgrade is programmed for near future – Concern expressed that this could be in conflict with both protection of Natura rivers and WEWS aims of maintaining/improving water quality in all water bodies.

SNH suggested looking at Argyll development plan for guidelines on rural development opportunity areas. Need to consider potential cumulative impacts on water quality and landscape. SNH has funding for landscape appraisals.

Environment workshop : Part 3 – Strategic Environmental Assessment (SEA)

Response to Consultation Authorities comments on draft Scoping Report; etc

SNH consider that the Habitats (Natura) issues have different assessment criteria to the EPS (Protected Species) issues, and so would be more appropriately dealt with through different Objectives and criteria

SEPA – better to refer to the 'water environment'. Also include flood risk against water conservation objective

It was agreed by the Consultation Authorities that it will be satisfactory to assess the strategic options/scenarios and then only test those locational options appropriate within the chosen strategic scenario.

HS – Note that 'historic landscape' is more than just Inventory sites. Not clear what 'other elements of built cultural heritage' means.

Consulting Authorities generally happy with documentation. Good to show potential mitigation on the assessment sheets.

AOCB

SNH raised issue of Open Space strategies. (Both Councils are working on these – Stirling, early days; Clacks draft). Structure Plan is opportunity to get strong policy commitment to protection, enhancement, functions, etc.

SNH has funding available for landscape capacity studies (Park has done study re windfarms).

HS confirmed that they would prefer to see Structure Plan referring to standard definition of 'historic environment' (as discussed through SEA consultation). Better if policy separated out consideration of nationally important features, such as Scheduled Monuments. Note their web-site for SHEP, etc.

Letter from SEPA
By email: sea.gateway@scotland.gsi.gov.uk

18 June 2006

Dear David

**ENVIRONMENTAL ASSESSMENT OF PLANS AND PROGRAMMES (SCOTLAND)
REGULATIONS 2004
THE CLACKMANNANSHIRE AND STIRLING STRUCTURE PLAN 2002: ALTERATION
No. 3 – SEA SCOPING REPORT- SEA objectives and sample assessment methodology**

Thank you for the submission of further information in connection with the above, providing SEPA with a further opportunity to comment on the adequacy of the SEA objectives and the proposed assessment methodology. SEPA also supports the approach adopted by the Council of early consultation and welcomes the open and proactive manner in which the Consultation Authorities are being engaged in the SEA process.

SEPA supports the use of the proposed matrix-based methodology to assess the environmental impacts of the policy/proposal options that are available to the Council. It should be noted that the likely duration of the effects, and their permanent and temporary nature should also be taken into account.

In relation to the proposed SEA objectives, SEPA considers that the list of SEA objectives is comprehensive and supports the proposed objectives but would like to make the following comments:

Objective 4

SEPA considers that the assessment criteria for use of land in a sustainable way could also include the use of brownfield land. In terms of the indicator "remediation of contaminated land", it should be noted that there are currently no statutory designations of contaminated land under Part IIA of the Environment Protection Act 1990 in the Structure Plan area. The indicator should therefore include remediation of land suspected or known to be affected by contamination as well as remediation of land with the statutory designation of "contaminated land".

The Scottish Executive has recently introduced a set of performance indicators to enable an assessment of the overall progress by local authorities and SEPA in carrying out their statutory responsibilities under Contaminated Land Part IIA regime. Local Authorities will be required to monitor number and total area of sites warranting inspection under Part IIA, number and total area of sites having been investigated under Part IIA and also numbers of sites which have undergone or are undergoing remediation both through the part Part IIA route and also under planning and redevelopment or voluntary remediation. These performance indicators will give an idea of the extent of land contamination in each local authority area and could be used as indicators for monitoring the effects of the implementation of the Plan.

Objective 5

A more appropriate summary for this objective would be to "Conserve and enhance the water environment" as more than just "water quality" is being considered. Under the heading "Environmental Objective relevant to the Structure Plan", SEPA considers that the objective should be extended to include the prevention of the increase of the risk of flooding. It is important to assess whether proposed development results in an increase in flood risk. Development should avoid areas at risk of flooding, areas of flood plains and areas that potentially increase the probability of flooding elsewhere but an increase in flood risk is also related to the provision of inadequate surface water drainage systems and the inadequate culverting of watercourses, and these effects are better assessed under the water objective. It

is noted that flood risk is also considered under climatic factors and SEPA agrees with this approach. Climate change is predicted to worsen these effects. The set of indicators in relation to flooding proposed under the climate objective could be used also for the water objective.

I hope that this advice is of assistance. Should you wish to discuss this response please do not hesitate to contact me on 0131 449 7296 or via SEPA's SEA Gateway at sea.gateway@sepa.org.uk.

Yours sincerely

Sofia Billett
Senior Planning Officer (SEA)
Environmental Partnership Unit (South East)

Summary of Retail Workshop
14th July 2006, Stirling Council, Viewforth, Stirling

Attendees:

Andrew Cordiner, LXB Properties	Donald McLean, Walker Group
Paul Kettrick, Stirling Council	Alistair McArthur, Walker Group
Andy Kennedy, City Centre Initiative	Katy Oliver, Stirling Ventures, Stirling Council
Andrew Paddison, University of Stirling	John Learmonth, SEFV
Jamie Cumming, J&E Shepherd	Tony Thomas, CB Richard Ellis
Ian Gallacher, GVA Grimley	Robert Drysdale, RDPC
Roderick MacLean, Roderick MacLean Associates	Angus Stenhouse, Standard Life Investments
Rachel Gee, Montagu Evans	Colin Moulson, Donaldsons, Thistles Shopping Centre

Officers in attendance were: -

Stirling Council – Allison Scambler, Claire Milne, Greg Bassam

Clackmannanshire Council – Julie Hamilton, Graeme Finlay, Ronnie Beveridge

General Discussion

- The growth options for the Structure plan area need to include consideration of the opportunities arising from the reopening of the Stirling-Alloa-Kincardine railway. The existing focus on Alloa town centre and the recent developments there require a time of consolidation in the short to medium term.
- CACI 2006 Retail briefing - concern and need to understand the reasons for Stirling's position in the retail rankings.
- Stirling City Centre Health Check required in order to accurately assess the impact of out of town development.
- Concern that the demand for retail growth had been overestimated in the Stirling Capacity Study.

Workshop Session

Question – What strategic role should Stirling City Centre, Alloa Town Centre, the Edge of Centre and out of centre locations play in the provision of retailing?

- The discussion sub-groups focused mainly on Stirling City Centre. The market perception was of a successful centre although a number of points were raised: -
 - Basically the established strategic shopping hierarchy, as identified in the current Structure Plan, is robust and ought to continue to be supported
 - However, the Stirling Centre lacks character with too many brand shops and not enough smaller 'quirky' shops to give the centre individualism. Alloa town centre has experienced healthy investment levels recently and this should continue although like Stirling it requires an improved image with better town centre type leisure facilities e.g. cafes, entertainment and other leisure features and for other civic functions and town centre type uses to be promoted.
 - Car parking facilities are not adequate to provide for city. As a result people are being discouraged from driving into the City for shopping.
 - City Centre has no real defining sense of purpose and is falling behind neighbouring Towns.
 - Existing retail units are constraining the introduction of new retailers due to their small size and layout. Recycling of existing stock necessary.

- Council has to raise profile of City to target the more affluent population if City Centre is to prosper.
 - The Forthside development is a very positive step if the City Centre is to prosper in the future.
 - Stirling is competing more with Glasgow than Edinburgh in the retail market because of the better transport links shared with Glasgow.
 - The streets in and around the City Centre look run-down and need revitalising. It was generally considered, however, that Stirling city centre offered significant scope to grow with more shopping developments. Especially if the existing city centre boundary is widened to include much of its neighbouring land that is either underused and where the existing uses could be relocated to more suitable sites in the city. This could also leverage improved and better use of the existing shopping offer.
 - Springkerse has significant scope for retail expansion.
 - Stirling has a wide customer base; this leaves the city vulnerable with local people choosing to shop elsewhere. In Contrast Falkirk has a very local customer base on which to build.
 - The Structure Plan should combine the current City Centre area and the Edge of Centre area into one large strategy for the City rather than having two separate strategies to enable the City to grow in a more planned and cohesive way.
 - A general view made was the need to balance the city in terms of its retail provision to prevent leakage.
- A broader distribution of household shopping around Stirling was not supported as such retailers will want to group together. The Raploch site does not best suit the needs of the retail industry, especially the household goods market and should be reallocated at Springkerse where there is high demand for such uses.
 - Alloa does not compete with Stirling town centre since it serves a different function in the retail hierarchy and although the Alloa town centre redevelopment strategy has been successful, there is a need for more non-food retail growth. There is nonetheless considerable scope to promote Alloa town centre more and the example of a similar context of Didcot, Oxfordshire was quoted at the workshop. The Sterling complex serves a different retail niche market and can continue to be supported accordingly.
 - The strategic retail role of the Major Growth Area should be recognised within the Structure Plan.

Question – Should the existing city/town centre boundaries expand or should they be confined to existing boundaries?

- There has been a lot of interest shown by retailers in the potential of the edge of City Centre locations. In response to this, Stirling Council should seek to actively expand the existing City Centre to accommodate this demand. One of the sub-groups indicated the potential for expansion particularly in the land to the south and south east edges of the city centre e.g. around the Burghmuir area and east of the railway in particular.
- Since the opening of the Thistle Centre mall there has been an increasing trend by the public to solely use the mall for their shopping needs. This has resulted in the traditional shopping streets being somewhat neglected by the public. The Council should try and combat this in the Structure Plan.
- Stirling does not offer a variety of shops and more discount stores should be located in the City Centre in order to accommodate all shopping needs.
- Stirling has the advantage of having a compact City Centre with all services being easily accessible by foot. This therefore reduces the need for car journeys to different parts of the city for retailing purposes, with exception of Springkerse.
- The Springkerse retail estate and the City Centre are not in the best condition they could be, in terms of design and character.
- Stirling needs a radical 'leap of faith' in terms of setting out a vision for the future if the city is going to compete on both the local and national levels. Lessons can be taken from Alloa's approach to their Town Centre. Alloa town centre has been expanded and recently

redefined in the Local Plan. Significant changes and redevelopment are taking place at this time with new outlets under construction.

- Measurable targets and goals should be set out in relation to Stirling's planned growth in order to measure the success of any strategies that are implemented.

Question – Which future growth options would be most appropriate and sustainable to pursue?

- The Council should consider the development of a reasonable sized retail site within the Major Growth Area of Stirling.
- An approach the Council may consider is to develop the retail sector within the City while demand is high and then the residential sector will develop accordingly.
- Stirling needs to set out its aspirations for the future, setting out how it wants to develop and where it wants to be in 20 or 30 years.
- Options 1 and 2 will lead to decline and must not be considered. A realistic growth strategy (options 3 and 4 - aspirational growth) should be promoted but will require a major expansion of the city centre. This should be considered as a separate retail development larger than the existing Thistle Marches Mall.
- Stirling City centre should continue to be the principal focus for retailing in the region and to do so it requires to be expanded, as mentioned above. In doing so to provide for the diversity and mix of town centre uses and activities described in the most recent national planning guidance SPP8. The urban fabric of Stirling City centre has the potential and scope necessary to achieve this both for improved use of existing buildings and for any redevelopment required.

Summary of Employment Sites Workshop
20th July 2006, Clackmannanshire Council, Greenfield, Alloa

Attendees:

Derek Gavin, Stirling Enterprise Park	Lois Thoms, Stirling Ventures, Stirling Council
Alistair McArthur, Walker Group	Paul Ketrick, Stirling Council
Allan Anderson, Scottish Enterprise Forth Valley	Hugh Lightbody, Stirling Council
John Learmonth, SEFV	Edward Trevillion, GVA Grimley
Joe Pacitti, Stirling University Innovation Park	Malcolm McArdle, Clackmannanshire Council
Mhairi Donaghy, EKOS Economic Development and Regeneration	Duncan Harvie, Stirling Ventures, Stirling Council

Officers in attendance: -

Stirling Council - Allison Scambler, Claire Milne, Greg Bassam

Clackmannanshire Council - Julie Hamilton, Graeme Finlay, Ronnie Beveridge

Workshop Feedback

- Stirling Business Space Strategy took into account in/out commuting. Main problem for Stirling is that out-commuting is generally to the higher value jobs and in-commuting is for lower value jobs (service sector).
- Stirling was many years ago comparable with Perth in economic marketing terms but it is somewhat behind the scene now, mainly because it rests on ineffective business land supply. It needs to become competitive again. Within the next 30 years Stirling will grow and start to encroach on the Green Belt boundary, the Council should be pro-active and plan for this forecasted growth. Stirling needs to be ahead of demand, capturing it at the right time and ensuring premises are available otherwise it will lose out to other areas. The Council should therefore have ambition and act on the projected growth figures rather than taking a cautious approach.
- Constraining the land supply affects land values which in turn affects the type of uses. Need to remove the residential 'hope value' attached to developable land to prevent land banking and ensure sufficient business land is available. The lack of available land is constraining development - Falkirk has vast amounts of office space available resulting in businesses locating to Falkirk rather than Stirling. The current business land hierarchy is outdated and the Structure plan needs to become up to date in its approaches for business prosperity.
- In Clackmannanshire the existing strategic employment locations have significant scope for further land take up and there would be further land allocations required as part of the Bridgehead development for business land following completion of the Upper Forth Crossing and the re-opening of the SAK railway. Details were given during the introductory presentations and it seems accepted by those present.
- A better understanding of past demand is required in order to plan for future demand ie. where are new businesses coming from? Analysis of past land take-up and development of designated employment sites is also necessary in order to identify how much of the 'readily developable' land has been developed in the past, how much retained for land banking and how much used for non-employment uses.
- The 70ha requirement for Stirling is based on current growth predictions. A higher growth strategy will require the identification of further employment land to support this growing population. The identification of further land is also necessary to allow for additional uses

to facilitate the delivery of sites. The identification of any new employment sites in Stirling should be related to the possible new rail station, adjacent to the A91. The potential of Milhall is also recognised but will probably require mixed use to ensure delivery. Indigenous growth should also be provided for.

- Mixed-use development should be considered where appropriate, this would help combat the shortage of allocated development land and assist/encourage speculative development. Mixed use must however be on the right sites (not all sites will be appropriate) and therefore be considered on a site by site basis allocated through the development plan.
- Any economic strategy and business land supply considerations require joint working and economies of scale. A more proactive approach is also required that could look to relocate existing businesses to more 'difficult' sites ie. Bandeath funded by the higher values released on their existing sites.
- In terms of office space, there is a need to plan for two types of provision: -
 - 1) City Centre high density – may also benefit City's shopping facilities.
 - 2) Out of centre lower density/car orientated – brings higher value jobs
- Stirling should try and gear itself towards a young professional population. This should be done by creating modern, attractive City Centre offices and flats where the targeted population prefer to locate themselves. Forthside is in a prime central location with the capacity for high density office space. It could go some way to meet Stirling's office space shortage however relocation of the Council offices to this site would reduce overall land available for general office space. A City centre occupier demand analysis is recommended in order to identify the level of demand for new office provision which could be used to generate private sector developer interest in new city centre office development.
- The city's sewage treatment works will need to be relocated in order to facilitate the estimated growth of the city.
- The current strategic business land locations are not appropriate for the way forward. Bandeath has problems in delivery of infrastructure particularly access; a potential solution would be a bypass. A bypass would also have the advantage of opening up the East of Stirling thus making it attractive to developers as the site is currently not in best proximity for the labour market and this is all reflected in its very slow rate of business land take-up. It requires either major investment or cross funding from major residential development and is more suited to being a leisure based activity centre with a mix of appropriate associated uses.
- Slow land take-up is similar for the other existing key sites or locations in the Stirling area. Castle 2 has significant infrastructure constraints that require forward funding. It should therefore be considered for a wider range of higher value uses ie. leisure, education college.
- Perhaps the time for large scale single user sites has gone and we might be better to focus on smaller mixed use type developments. Remembering of course the need to differentiate between strategic and local business land provision.
- In rural areas there is demand but a lack of good land for development. It's better to have two business centre areas rather than one, to prevent the landowners having a local monopoly. This small amount of competition should also create interest in the area.
- As mentioned above better understanding of the "demand" characteristics and assessment of demand should be the basis for forward planning. Also to focus on the latest ODPM guidance "Employment Land Reviews, 2004" to assess and identify an up-to-date and balanced portfolio of business land or employment sites e.g. this is more explicit on the different forms of business land to be involved covering:

- constrained employment land supply
 - established employment land supply
 - immediately available employment land supply
 - marketable employment land supply
- Whilst Clackmannanshire has ample business land supply, Clackmannanshire Council has commissioned a dedicated study on supply and demand factors so this should duly inform the Structure Plan. The study is to be based on best practice and notably follow the ODPM model for Employment Land Reviews and will also use the examples of Falkirk Council and the Aberdeen and Aberdeenshire employment land audits, 2004.

Summary of Clackmannanshire Community Workshop

13th September 2006, Clackmannanshire Council, Limetree House, Alloa

Sub – group feedback

22 delegates attended the workshop that was held in Lime Tree House on Wednesday 13th September 2006. Representatives attended from the following groups:

- Muckhart Community Council
- Dollar Community Council
- Alva Community Council
- Clackmannan Community Council
- Tillicoultry Community Council
- Menstrie Community Council
- Friends of the Ochils
- Clackmannanshire Field Studies Society
- Friends of Alloa Tower
- Dollar Civic Trust
- Mulraney Properties
- Clackmannanshire Council Community Planning Co-ordinator

Officers in attendance were:

- Graeme Finlay and Ronnie Beveridge

The key issues and concerns raised by the sub groups are noted below in no specific order of priority or importance. A useful and valuable discussion ensued in both groups, and all comments were noted.

Group 1 – Facilitated by Ronnie Beveridge

- Initially the group generally considered that we ought not to be developing so many houses when there is not enough employment in the area.
- The Council should be ensuring that those that already live here are able to find meaningful work locally.
- It is not at all acceptable to continue to promote and establish a grand 'Commutersville'.
- Deep concern was expressed that the identity of our existing settlements must not be lost through coalescence of towns and villages with associated loss of Green Belt etc. There must not be any Ribbon Development allowed.
- The Council is not doing enough to create jobs and promote employment
- There is insufficient employment land supply and supply of premises. It needs wider categories of choice in location and types of site for medium to smaller business'. Fair enough that we have strategic sites but more priority must be given to providing an "effective land supply". The example was quoted whereby the Council owned sites (CETERIS land) are the only agents being given structural funding towards business expansions.
- We must consider the current approach in the SP as inadequate since mixed uses and releases of land for smaller business is required. We need a healthy supply of land for local employment. This means not allowing land that is allocated for business use to fairly easily be re-allocated for housing; examples at Menstrie and Tullibody where this has happened were quoted. RB mentioned that the SP Alteration 3 must consider how and what the land use planning function can do to provide for this expressed aim for employment land in Clackmannanshire and quoted that the current Plan mentions the Bridgehead locus as a new provision to add to the existing strategic locations at Tullibody and Alloa. Alteration 3 must include more specific strategic guidance on why and how this can be implemented. Also it is intended for Alteration 3 to update and clarify the overall approach for employment

land. The Consultative Draft Plan will provide the first opportunity for public comment.

- ❑ RB also pointed out that the Council has commissioned a study in Supply and Demand for employment land and property. It is intended for this to inform the way forward in the SP and of course in implementing the current Economic Development Strategy for the area.
- ❑ Delegates sought justification on the statistical data available and to ensure it is robust e.g. questioned the value of Scottish Executive data on employment sectors, unemployment levels, travel to work patterns etc.. It was suggested that we should have or need specific and more precise data as to where precisely people go out of the area to work since only then can we know what to do to rebalance this.
- ❑ Delegates were concerned on the adverse impacts of the new superstores on our local shops and the rest of the town centre.
- ❑ Accessibility is a key issue related to the ageing population and older people must be able to get to the shops and services more easily.
- ❑ When considering the level of growth that ought to be pursued in Clackmannanshire the delegates did not waver from their prime concern about employment and employment land and returned to discuss this further a few times. This included the point that they would prefer if the housing growth was in Stirling if that meant the employment was here work Clackmannanshire i.e. Stirling people commuting to Clackmannanshire to work. On moving on the housing growth issue they stressed that this should be done only with and if new employment land is also allocated. This means the “moderate” growth scenario that means the existing settlements being the limit of new build might be acceptable. The high growth scenario is a big NO NO because it will only be a ‘Commutersville’.
- ❑ It was accepted that new housing could possibly leverage higher demand for office type development in the longer term.
- ❑ Serving to support the importance of employment Community Planning indicated that the local Economic Theme Team was the main source seeking to appreciate the value of community spirit and sense of community since it can in turn support a healthy economy.
- ❑ Overall the principles for sustainability are supported.

Group 2 – Facilitated by Graeme Finlay

- ❑ There is not enough affordable housing for young people, this may be contributing to the projections for an increasingly elderly population and will potentially make matters worse.
- ❑ More smaller, specialist units should be built for the elderly which may encourage them to move out of their larger homes which would be more suitable for families.
- ❑ Building flats is not a good idea e.g. problems in the Mar Policies area, although this could be due to the housing allocation system rather than poor or substandard housing.
- ❑ Public transport needs to be improved.
- ❑ The Council should take a look at its own housing stock and take the opportunity to improve or replace stock in poor repair.
- ❑ The Council should consider adapting its stock to suit the needs of the rising numbers of smaller households.
- ❑ The Council should enter partnerships by providing either land or financial assistance to build more affordable homes.
- ❑ Should try to discourage the amount of out commuting and promote Clackmannanshire as a place to work as well as a nice place to live.
- ❑ The transport improvements are welcomed, however care will have to be taken that the area does not become a dormitory full of commuters.
- ❑ Encouraging more employment would reduce the amount of out-commuting.
- ❑ The Council should provide more housing specifically for younger people.
- ❑ Could the Council stop selling off it’s housing stock or start building more Council houses.
- ❑ Affordable housing shouldn’t just be houses to buy, there should be more housing available for rent and a large percentage of this should be Council owned.

- ❑ Access to existing services has to be improved, particularly for the elderly, considering the projected ageing population.
- ❑ The area around the new Upper Forth Crossing represents an important gateway into Clackmannanshire and presents a good development opportunity. It would need to be of high quality with good amenity where it was visible from main transport routes.
- ❑ Bridgehead area may be popular with distribution companies, however large sheds should be avoided, needs high quality development.
- ❑ Employment uses around the bridgehead would be welcomed, would be a good site for a headquarters type development.
- ❑ Despite general support for some development, particularly housing and employment, one of the big attractions of the area is the environment, and this should be protected.
- ❑ Concern over the content of SPP15 and future impacts on the countryside. The Structure Plan must get the level of protection/acceptable development in the countryside right.
- ❑ Development which would bring the Hillfoots villages closer together should not be allowed. Coalescence should be prevented and visual separation retained.
- ❑ Considered that SPP15 relates more to remote rural areas rather than accessible rural areas like Clackmannanshire and that it is not necessarily appropriate to take on board all aspects of SPP15.
- ❑ Need for more small business units for local businesses with a further hierarchy of unit sizes to enable them to expand in Clackmannanshire rather than relocate.
- ❑ Grants for businesses and the perceived “value for money” element of locating in Clackmannanshire should be promoted.
- ❑ Must protect the built heritage and ensure that Historic Scotland are regularly consulted and involved in policy preparation and decision making.
- ❑ Need to fully understand and address flooding issues.
- ❑ Conservation areas and natural heritage areas should be protected.
- ❑ Re-opening of Alloa to Stirling passenger rail service is welcomed, but the line should be safeguarded to Dunfermline.
- ❑ Options for more destinations reached direct by train from Alloa should be explored.
- ❑ The new Upper Forth Crossing should have been multi-modal with a railway going to Falkirk/Edinburgh.
- ❑ People could be attracted to the area if facilities were improved, e.g. a cinema.
- ❑ Those already living in the area would spend their money in the area instead of travelling to other areas.
- ❑ Natural attractions such as Gartmorn Dam should be promoted.
- ❑ The area needs a “Unique Selling Point” to encourage people to live, work and visit and give a sense of identity.
- ❑ Clackmannanshire should be promoted more.
- ❑ Scope to pursue further renewable energy opportunities in appropriate locations.
- ❑ Should investigate and encourage micro-renewables and energy generation ‘at source’.
- ❑ Clackmannanshire should champion eco causes, which could be the “Unique Selling Point”.
- ❑ Forestmill was supposed to be designed as an eco-village, but there is little evidence of these principles in the planning application.
- ❑ Eco-tourism could be encouraged.