

# Falkirk Local Development Plan 3

## Consultation on Topic Papers

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We give consent

*Please note without your consent we are unable to accept and process the information provided.*

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What topic paper are you commenting on?

Green Belt, March 2024

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What is your view on the evidence contained in the Topic Paper? (please tick as applicable)

- Agree** broadly with the evidence
- ~~Disagree with parts of the evidence (specify below)~~
- ~~Consider there are significant **gaps** in the evidence (specify below)~~
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**Please identify any areas of disagreement with the evidence, including reference to information or sources of information which provide alternative evidence.**

The topic paper is focused on green belts and therefore summarises the specific policy on Green Belts in NPF4 (policy 8). It could perhaps also helpfully make clear that NPF4 is intended to be read as a whole and that the green belt policy is effectively supported by other policies - and in turn policy 8 supports other policies and policy aims (eg policies 1,2,3,15,18,19 etc).

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**Please identify the gaps in the evidence, including reference to any information or sources of information that could fill these gaps.**

We appreciate that there are several references to the Falkirk Greenspace Initiative which has had multiple benefits perhaps including the basis of a nature network as referred to in NPF4.

However, it would be helpful for this information to be expanded upon to indicate the local authority's evidence as to achieving the third policy outcome in NPF4, ie that "Nature networks are supported and land is managed to help tackle climate change". In particular the shift to giving consideration of tackling climate change much more weight should be addressed in the paper.

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### **Any other comments:**

There are several references in the topic paper to "pressure for residential development" in some areas of Green Belt, however, what pressure means in this context is not stated. We presume it means there have been or are proposals for speculative housing development either being discussed, consulted on or applied for? We understand that the latest (2023) Housing Land Audit shows a ten-year supply on land for new housing that is comfortably in excess of the MATHLR in NPF4 so there does not appear to be any urgent need to add to the allocated housing pipeline in the short term (let alone specifically by releasing areas or green belt).

It might also be worth highlighting more explicitly the part of the Scottish Government's Local Development Plan Guidance (May 2023) that proposes that green belts may support the spatial strategy in an LDP by:

- making effective use of land and supporting regeneration (prioritising the re-use or redevelopment of brownfield, vacant and derelict land and empty buildings first, before new development takes place on greenfield sites), and minimising the need to travel using unsustainable modes; and
- Protecting, enhancing and providing access to multifunctional blue and green networks and open space.

The topic paper currently notes at 2.6 and 2.7 that the Green Belt is consistent with NPF4 but the Guidance appears to put more emphasis on prioritising the re-use of buildings/brownfield rather than Greenfield, minimising unsustainable travel and access to open space etc.