



Gladman Developments,
2 Eliburn Office Park,
Livingston,
West Lothian, EH54 6GR

12 December 2016 – via email views@your-views.co.uk

Dear Sirs

PAN-2016-007 Land 160 Metres South Of Broadgate House, Campsie Road, Strathblane

Strathblane Community Council provides its response to your pre-application consultation regarding proposals for a substantial residential development on Campsie Road, Strathblane, and the moving of the existing green belt boundary and currently designated cemetery to a location further east.

We consider your proposal to be gratuitous, unwelcome and opportunistic. It shows scant regard to the current nationally accepted and orderly process of identifying development opportunities.

Having consulted as widely as possible in the circumstances permitted, the community council is clear that the overwhelming majority of the community are against your proposals. The main reasons are as follows:

- **We have agreed a Local Development Plan that has considered and rejected the proposed site already.** Both our community council and Stirling Planning Authority have spent considerable time consulting with our local community through a meaningful process over the past few years resulting in the current agreed Local Development Plan. We believe that the current Local Development Plan has taken consideration of the local needs, local communities' comments, has evaluated the housing needs and options and has repeatedly considered and rejected the site proposed by Gladman.
- **Your consultation was misleading and calculated to take the community by surprise.** At very short notice, a drop-in session was announced for the afternoon and early evening of Halloween night. Many people would have been unable to attend due to work and commuting, not to mention family commitments around Halloween. The publicity surrounding the event was poor, and only the publicity by the community council achieved the turnout. We expect that the overwhelming majority of responses to your consultation were negative. Even if some were positive, as your representatives heard at our public meeting on 5 December 2016, some members of the community who had responded to your questionnaire now wish to change their response. No doubt this was partly because they now recognise the misinformation that was

included in your exhibition boards and website. Therefore, any favourable responses to your consultation may be considered as of dubious value.

- For example, you have said “The Council has identified the site ... as being appropriate for release from the green belt and has accepted the principle of development on the site.” This is plainly untrue. The land is currently allocated for a cemetery extension which would be within the Green Belt. The retention of the Green Belt boundary at this site is an explicit part of the Local Development Plan, and was 100% backed by the Scottish Government Reporter in his review in 2014. Charles Connell & Co’s arguments to release the land were presented and fully considered by all the authorities at the time, and reconsidered in the recent Main Issues Report (MIR) procedure. The Council report following the recent MIR consultation reiterates that the Reporter agreed with the Council's present view that the allocation of Site H106 (now developed) and the cemetery extension would permit the formation of a strong Green Belt boundary, and that further residential development would have unacceptable impacts.
- As another misleading statement, your consultation documents allege that Stirling Council’s existing plans do not provide an adequate supply of housing land, as required by the Scottish Government. The need for increased housing allocation in the Core Area was fully considered in the examination of the LDP of 2014 and in the LDP revision for 2017, and according to Stirling Council officers’ recent report to the full meeting of the Council that took place on 8 December 2016, the supply requirements are met. Even if Gladman were right that there was an inadequate supply, this would relate to the whole Stirling Council planning area¹. It is clear from the policies in the LDP that any increase in housing supply would be found in the “core area”. Among all the different options that have been considered, neither Stirling nor the government has ever proposed that any additional housing allocation should be made in the rural areas, let alone on this Green Belt land, remote from Stirling’s core area and services.
- **The Local Development Plan already identifies adequate plots for “controlled but limited expansion” of the village.** Recently under the adopted LDP of 2014, a site on Campsie Road was identified and allocated for development of private and social rented housing. This development of 28 units has only recently been completed and occupied with 50% social housing². Within the proposed Local Development Plan there have been areas identified for housing developments within Strathblane to meet the needs of the community and protect the Green Belt. In particular, a new allocation of up to 30 units has been included in the Proposed LDP for 2017 (site South of the A81, H153). The recent report to council has clearly indicated that there is no demonstrable need for additional housing land in the Strathblane/Blanefield area.
- **Gladman’s submissions to the council have also been misleading.** In the officers’ report to the Council meeting of 8 December 2016, Gladman’s “Vision Document” is quoted:

‘The 2015 Main Issues Report (MIR), in response to a previous promotion of this site (SBL05), identifies a number of landscape and visual matters as being particularly sensitive in reaching the view that the site should not be allocated. However, an earlier report (Strathblane Green Belt Study, 2009) clearly identified

¹ Confirmed by you at the public meeting on 5 December 2016

² Incidentally, the allocation was against the wishes of your client Charles Connell & Co, who argued that 50% social housing could not be delivered.

the site as having “potential capacity for development where Green Belt function would be maintained, but local landscape and [settlement identity] issues should be considered.”

The council’s officers find no support for Gladman’s position in the 2009 Green Belt Study. What Gladman fail to acknowledge is that the site H106, and the currently proposed cemetery extension, come after the Green Belt Study. Therefore the “potential capacity for development” suggested in the 2009 study has already been identified, already been consulted upon, already been approved and already been developed. Only the cemetery extension remains to be put in place for the plan to be completed. There is no support for the suggestion that potential for development still exists at this location. In any case, Gladman’s proposals would also fail to address the local landscape and settlement identity issues highlighted in the study.

- **The new development would not contribute to the Stirling area, and would undermine the aims of the current LDP.** New residents in a development of the type proposed would be almost entirely commuters to Glasgow. The neighbouring authority, East Dunbartonshire Council also made submissions against expansion of Stirling’s rural villages. Transport issues such as commuter traffic, and conflict with tourist traffic were highlighted. New development in the Bearsden/Milngavie area is exacerbating the already inadequate park-and-ride facilities.
- **Space in the cemetery is running out and we need action now.** There is a very limited number of plots left in the existing cemetery. When the Cala development (H106) was built on the area previously earmarked for a cemetery extension, after robust discussion by the local community, during the consultation process it was agreed that the new cemetery would be adjacent to the Cala Development to close the envelope of the village. All of the community, as well as Stirling Council and the Examining Reporter, were clear that there would be no further housing development beyond the Cala site, and a new site for the cemetery would be established, also establishing a robust Green Belt boundary. The Gladman proposal would stop the cemetery being developed in the agreed location and the alternative location is clearly inferior. The current location is near enough to the church parking and other village amenities, so that minimal roads and parking would be required on the cemetery site, and intended rural character of the cemetery can be achieved. If the cemetery were relocated, as Gladman proposes, it would need an entirely different character, with full parking provision. This more developed appearance would undermine the landscape setting even further along the valley.
- **The Gladman proposals would push local services beyond capacity and therefore would need significant further investment from the Council.** We believe this proposal would impact on the village services negatively resulting in at least a 10% increase in population; our local schooling, which is close to full capacity; our roads system and our waste water sewage which is also close to capacity. We are remote from the local authority services, and already larger in population than the other villages in the rural area. Current information from Scottish Water confirms that the sewage system does not have capacity for the proposed number of houses.
- **The proposed development would threaten the identity and setting of the village.** In considering the current LDP before it was adopted, the Reporter³ considered a proposal to amend the Green Belt boundary to the west of Blanefield, to include the care home site along with the intervening land between the care home. This was promoted as a “minor expansion of the village”. The

³ Examination report 7 March 2014, para 26

Reporter responded “Under no circumstances could such a level of release be regarded as minor. As argued by the planning authority, housing allocation would give rise to a scale of development which would threaten the identity and setting of the village.” The size of the site in question was smaller than the one proposed by Gladman on Campsie Road. Therefore it is inevitable that the Reporter would see this proposal as an unacceptable enlargement of the settlement. (And that is even without considering Charles Connell & Co’s other site to the north of the A891).

- **Such a drastic change from the agreed Local Development Plan so soon after it has been agreed would puncture the credibility of Stirling as a planning authority.** We also believe there has been a full and meaningful consultation process already completed by Stirling Planning Authority. This has been fed into the proposed Local Development Plan. We feel that this proposal makes a mockery of what the community have fed back and will damage the Authority’s credibility with the local community.
- **The proposed development would set a dangerous precedent.** Furthermore, if one development such as this were to be allowed, in violation of the Green Belt and the LDP, it would not be the last one, in all probability. It is known that the landowner of the proposed site, Charles Connell & Co, also owns land to the north of the A891, and would surely press for development of that site also. The recent report to Stirling Council on the proposed LDP makes this point clearly: “As highlighted in the site assessment further urban development at this locus would appear as sprawl into the countryside. Any allocation would also set a precedent in terms of the limit of the village edge which would then place pressure for future development land allocation to the north.” Other landowners have pressed very hard for developments in the Strathblane Green Belt, and been rejected on appeal. If a development such as this were suddenly allowed, those other developers, too, would be emboldened to make fresh applications.

In conclusion and in the light of the foregoing, we consider that this application should be rejected, not only by Stirling Council, but also by any Reporter on appeal. The results of your own consultation, while it is flawed, will clearly demonstrate the opposition among the local community. We urge you and the landowner to respect the established Local Development Plan which is the result of greater consideration than your proposals, and on which the community, as well as Charles Connell & Co, have already been fully consulted.

Yours faithfully
for Strathblane Community Council

/Avril Keen/



Avril Keen, John Gray
Planning & Licensing Correspondents

CC: Iain Jeffrey, Stirling Council, (jeffreyi@stirling.gov.uk and info@stirling.gov.uk)