



Mark Laird, Planning Officer
Stirling Council

7 August 2017 – via email info@stirling.gov.uk

Dear Mr Laird

17/00434/PPP Land 160 Metres South Of Broadgate House, Campsie Road, Strathblane

Strathblane Community Council provides its response to Gladman's application for Planning Permission in Principle 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.

Introduction

Having consulted widely both in the pre-application stage and now in response to this application, the community council is clear that the overwhelming majority of the community are against Gladman's proposals, or any housing development on the site.

We note that the proposal is contrary to the Local Development Plan (both the current and the "Proposed" version), and we note that it is opposed by several statutory consultees. Of special concern is the applicant's disregard for the Green Belt designation, which was been examined and confirmed in 2009 and reaffirmed in every iteration of the Local Development Plan process.

We have studied the applicant's submissions and supporting evidence in detail, and find it unconvincing. The evidence provided seems flawed and/or fails to support the conclusions presented in the Design Statement. Some relevant points are selected for discussion below.

Consultation by Strathblane CC

Extensive publicity and consultation was organised in response to Gladman's pre-application consultation. Our response to the pre-application consultation is attached as Appendix 1.

In response to the planning application 17/00434/PPP, an online and paper survey was organised, in conjunction with two drop-in meetings and a special meeting of the community council. A copy of the survey document is presented in Appendix 2. 216 submissions from residents were received, including 50 on paper and the rest online, representing well over 10% of the local population. Five non-residents completed the survey. Detailed results of the survey are presented in Appendix 3 (residents answers only). Some of the key results will be mentioned below, and some of the respondents have made representations directly to Stirling Council. However, the planning officer is invited to review the

numerous detailed comments that have been submitted by concerned residents. A substantial number of these were additional to those who had replied to the pre-application consultation. Postcode data and IP addresses are captured, to ensure the answers are verifiable in case of challenge. The postcode data indicates that responses were from all parts of the community. There were eight partial answers which did not specify whether they were resident or non-resident. These were disregarded, but their content was in agreement with the majority, in any case.

Many residents thought that the pre-application consultation was biased, and deliberately timed to frustrate genuine engagement¹. The timing of this planning application, which fell over the summer holidays and the summer recess of the community council, has imposed tremendous additional effort on volunteers and community members. This timing cannot be coincidental.

The application will be discussed under the following headings:

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We fully expect that the application will be rejected by Stirling Council, and that any appeal which may be filed will also be rejected. However, and purely as a precaution, we present at the end of this document some conditions that we consider essential, if by some chance the application should be allowed.

Local Development Plan

Stirling Council, after extensive consultation with the community and with developers and landowners has agreed a Local Development Plan that has already considered and rejected the proposed site. Strathblane Community Council and others from the local area have made extensive contributions to the LDP process. We believe that the current Local Development Plan, and the proposed LDP currently under examination, has taken consideration of the local needs, and of local communities’ comments. At each stage, the LDP process has evaluated the housing needs and options and has repeatedly considered and rejected the site presently proposed.

¹ Appendix 3, Question 2

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 (formerly H016, now called Braidgate) 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. The community council does not oppose developments without particular reasons. A significant new allocation of up to 30 units has been included in the Proposed LDP for 2017 (site South of the A81, H153/SBL06). Other brownfield and infill sites have been proposed and granted permission, within the settlement boundary³ and in the wider area.

We agree with the Spatial Strategy of the current and the Proposed LDP, such that significant expansion of Strathblane and similar rural villages is undesirable. Minor expansion to meet the needs of the community itself is all that should be allowed. Without doubt, the present proposal is designed primarily to meet the needs of the landowner and Gladman Developments.

The survey shows that community strongly desires that the LDP be respected, and not disregarded for the present proposal⁴.

In considering the current LDP before it was adopted, the Reporter 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 village boundary and the care home. This was promoted as a “minor expansion of the village”. The 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 current proposal. In our recent survey we asked residents whether the current proposal could be considered “small-scale expansion” of the village. Over 90% of respondents rejected that idea⁵. Over 90% of residents considered that the proposal threatens the identity and setting of the village⁶.

As the Design Statement acknowledges:

The first Stirling LDP allocated the land to the west of the promotion site (reference H106) as a site for residential development, and this has been substantially completed. The LDP also allocated part of the promotion site for a

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

³ For example the following recent individual proposals have been approved 13/00233/FUL & 15/00254/FUL (1 or 2 dwelling houses South Of Yarrow House Glasgow Road Blanefield); 16/00571/PPP (2 dwelling houses adjacent to Kirkhouse Inn); 16/00268/FUL and 16/00056/FUL (2 + 2 dwelling houses Moor Road); 15/00407/FUL (dwelling house Campsie Dene Road Blanefield); 14/00716/FUL (Extension and subdivision of dwelling house Campsie Dene Road); 12/00505/MS (2 dwelling houses Milndavie Road Strathblane). This list is not complete. Other proposals outside the settlement boundary have also been approved.

⁴ Appendix 3, Question 5 – 94% vs 3%

⁵ Appendix 3, Question 7 – 92% vs 6%

⁶ Appendix 3, Question 8 – 92% vs 7%

cemetery extension, under Primary Policy 3 (Infrastructure Provision). Both of these allocations, as well as the green-belt around Strathblane have been carried through to the Proposed LDP2.

The Design Statement then says:

Site H106 has now been substantially completed, and it is clear that the mitigation envisaged by that allocation has done little to reduce the visual impact of the development.

This is obviously completely false. The cemetery development which is proposed to establish the hard settlement boundary has not even been started. The “dense woodland” planting which was a condition of the development of site H106 has not been done, and the parts that were already in existence are immature at this stage. (Incidentally, the Design Statement applies a double standard in relation to its own visualisations, when it asks us to make allowances for the subsequent establishment of screening by trees⁷.)

Apart from Gladman Developments, all parties agree that a “plan-led approach” is wanted. For example, in its submissions against the Proposed LDP, the housebuilders’ organisation Homes for Scotland strongly urges development to proceed in accordance with Local Development Plans, and not by individual applications breaching the plans.

Green Belt

The proposed housing development is in the Strathblane Green Belt, which should be sufficient to ensure that the application is rejected without further discussion. Development within Green Belt should be allowed only under exceptional circumstances. None of the exemptions associated with Green Belt policy applies in this case. Neither can a landowner’s desire for profit be considered exceptional. The community council is adamant that the Green Belt must be respected at all costs. The fact that this is also the view of the community at large, is evidenced in the survey⁸. The impact on the landscape and setting of the village will be discussed further below.

To allow such an application against the Green Belt designation would set a dangerous precedent. Only by rigorous defence of the Green Belt have the aims of the plan and the character of the local area, from Strathblane, through Mugdock to the East Dunbartonshire boundary, been protected from rabid development. If one development such as this were to be allowed, in violation of the Green Belt and the LDP, more applications would follow. It is known that the landowner of the proposed site, Charles Connell & Co, also owns land to the north of the A891 and other fields around.

This is highlighted by the planning officers whose report 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.

⁷ Design statement on page 14

⁸ Appendix 3, Question 6.

The Green Belt designation for this particular site has been examined repeatedly and reaffirmed in both the current LDP and the Proposed LDP. The present landowner has promoted this site at every stage, and it has been considered and robustly rejected. As has been already pointed out in response to the pre-application consultation, the Design Statement find no support in the authoritative Strathblane Green Belt Study, 2009. While that 2009 study does indeed mention “*potential capacity for development where Green Belt function would be maintained, but local landscape and [settlement identity] issues should be considered*”, the Braidgate site H106, and the currently proposed cemetery extension, come after the Green Belt Study of 2009. In other words, “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.

Having considered the local landscape and settlement identity issues, the LDP concludes the Braidgate development would be the last housing development on this road, and that a firm green belt boundary would be established by the provision of the much-needed cemetery extension. The LDP therefore proposes a robust boundary to the settlement and Green Belt, which the authority is committed to deliver on a short timescale. The solution proposed in the LDP, supported by the vast majority of the community, is the one which should be adopted.

Flood Risk & Topography and Ground Conditions

We note the contents of the Drainage Report including Flood Risk Assessment (FRA). The field proposed for development is a very wet place, and the assessments and development proposals are unconvincing.

We note that release of water from the site is to be “attenuated” and “accommodated” within the site, so that there is no detriment to properties downstream of the application site. It is proposed that “the site will drain to an attenuation basin located within the south west of the site” and “attenuated discharge from the site will connect to the Blane Water on the site boundary”.

To achieve this, major redirection of flows is proposed to deal with a flow of water across the site by

“the development of a drainage channel to intercept the overland flows and direct them towards the southern flow path, as shown in figure 5. The main advantage of this would be that the risk of flooding of properties will be reduced as there will be no flow path across the site. The overland flows are not being removed from the river catchment and therefore redirection of the overland flows would not lead to an increase in flood risk.”



Figure 4 – FRA extract showing 1:200 year + CC flood event



Figure 5 – FRA extract showing 1:200 year + flow channel

Figure 1 Images from applicant's drainage/flooding report: before/after addition of "flow channel".

This is not credible. For one thing, the predicted "200 year" situation modelled on the map is not far from the situation regularly encountered in wet weather, be it in winter or, as this year, in summer. Flash flooding occurs on a regular basis, whenever the Strathblane Hills and general landscape are saturated with water. The modelling appears to take no account of additional water which flows onto and along the railway path, joining the site where it can. (See photographs later)

Here in the middle of summer 2017, a mild spate following overnight rain results in this appearance of the site.



Figure 2 Flow at South West corner of site, August 2017



Figure 3 Flow under railway path August 2017 (compare FRA Photo 3)



Figure 4 Water flowing on railway path August 2017



Figure 5 Large flow channelling under the track bridge August 2017



Figure 6 The flow path across the middle of the site is flooded already, August 2017

Figure 5 above shows an impressive flow through the old stone archway under the track, which is a bottleneck and the proposed new flow channel would increase the flow at this point.

In Figure 4, water is flowing over the path, inches deep at other places, and flowing in hidden streams in the verges either side. The above photographs are from this summer, and show that flows already join the river from the ground to the south, and not only ground to the north as considered in the FRA.

The following photographs were taken on a winter day, on 8 December 2011.



Figure 7 Water flowing on railway path December 2011



Figure 8 Water flowing on railway path December 2011, up to 2 feet depth (contrast [the same location in Figure 4](#))



Figure 9 Flooding of lower part of site December 2011 (view from above, before Braidgate development; red arrow indicates "tree Island")



Figure 10 View of flooding, from railway path, December 2011



Figure 11 Flooding at railway path/exit for water, December 2011 (orange arrow shows burial mound; blue arrow shows Dunglass; view point of FRA Photo 2 is similar)

The levels of the burn can rise and fall several feet within a couple of hours, when heavy rain falls. The same water a minute later is coursing through private gardens and park grounds downstream in the village. Any increase in the severity of these events will create danger and damage throughout the existing settlement. Videos of the same scenes from December 2011 and August 2017 are available, if required. Figure 12 is an excerpt showing the torrent heading from the site towards the village. Figure 13 shows the same torrent downstream in a private garden. Figure 14 shows it narrowly passing under the bridge at Kirkburn Road.



Figure 12 Still from video showing torrential flow from site towards village, December 2011



Figure 13 Torrent of December 2011 in a private garden downstream (still from video)



Figure 14 Torrent of December 2011 downstream crossing Kirkburn Road (still from video)

Figure 15 shows the proposed housing site waterlogged in the last winter, February 2017.



Figure 15 View of the site from Braidgate, February 2017

Figure 16 is a map detail from the applicant's Drainage Report above. Notice in Figure 7 and Figure 9 the long, thin "island" with mature trees. This allows us to relate these photographs to the indicative masterplan, and the drainage map of the site.

As can be seen from the photographs, the footpaths in the indicative masterplan will flood routinely, not only every 200 years. The models used do not seem to take into account extensive flows and flooding observed along and around the Railway Path, whose origin is unknown. These may be arriving down the slopes from the south and east of the site, outside the selected model. Likewise, the models used in the FRA do not seem to predict the standing water in the northern part of the site, visible in the recent photo Figure 17, below.

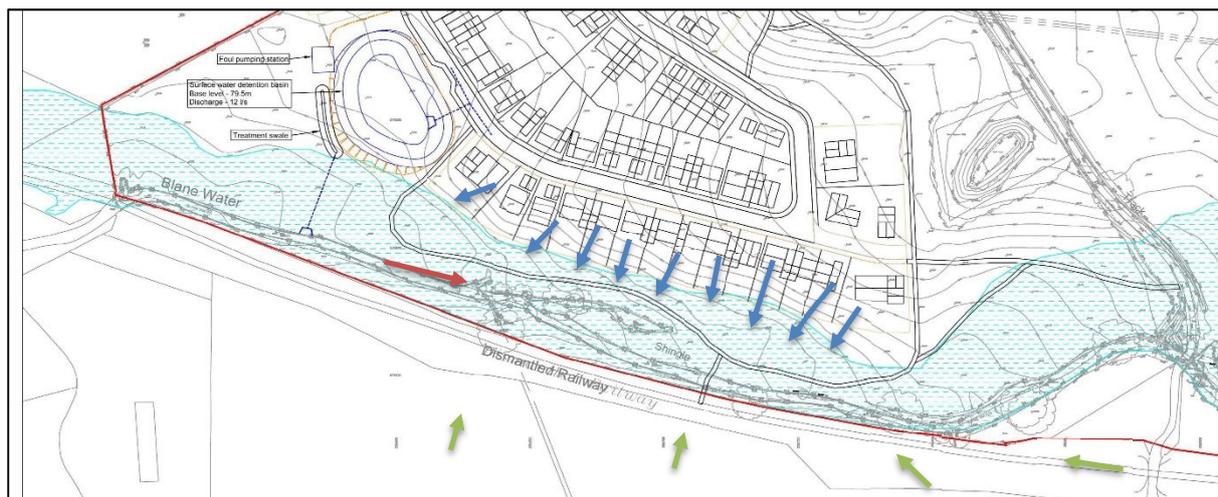


Figure 16 Detail from applicant's Drainage Report, Appendix 1 (red arrow indicates "tree Island"; blue arrows indicate drainage from garden grounds not captured by SUDS; green arrows indicate flow unaccounted for, arriving from slopes to the south)

Even a casual view of this drainage map calls into question whether the SUDS proposed can realistically achieve the goal of no increased run-off, compared with the greenfield site. Referring to the blue arrows, which follow the slope indicated by the contours, there is no obvious way for drainage from these 14-15 gardens to reach the surface water detention basin. Section 6.4 of the Drainage Report confesses that the design of the drainage system "is not part of the commission" and is a detail to be "discussed and agreed with Stirling Council". The community will have no confidence in any "maintenance regime", particularly if the risk of flash flooding is primarily to properties and public spaces downstream, and not to this proposed housing development itself.

We note that SEPA object on the grounds of lack of information, and also they object to the site layout in the illustrative masterplan:

"Both of the options proposed by Kaya include land raising within the functional floodplain and are therefore unacceptable as is the layout on the Illustrative Masterplan."

SEPA section 3.2 highlights the risk to the "high-class" watercourse that is the Blane Water, which can be damaged by engineering works, both on the site, and with the proposed "flow channel". SEPA section 3.3 also highlights the need for adequate sewerage, which is not available (see below), and for SUDS during construction, not only on completion. Given that the construction site extends into the waterlogged part of the site, it seems doubtful whether this can be delivered.

From the community point of view, all these issues confirm that a speculative planning application “in Principle” is unsuitable as a basis for any decision on this site. There simply is no plan on which an environmentally sensitive decision can be made.

Landscape and visual impact

The visual impact on approach to the village and on leaving the village, as well as the visual impact from further afield would be completely unacceptable. In our survey (Question 8), 92% of residents believe that the proposed development threatens the identity and setting of the village. Many individual comments are provided in the detailed report Appendix 3.

In the applicant’s Design Statement, section 3.5, consideration is given to the landscape and views and views. Several passages from the 2015 Main Issues Report (MIR) are quoted, which explain very clearly and firmly why this site is not suitable for development, and we strongly agree with those passages. In the Design statement, the only thing the applicant does is disagree with the assessment. The applicant’s comments ignore the impact of the cemetery, which would be shifted beyond the natural rise in the ground, and therefore would shift the point at which the settlement becomes visible from all directions.

The applicant has provided a “landscape and visual impact assessment” or LVIA. The LVIA refers to the green belt and its purposes, and refers to the Local Landscape Area which is closest at hand, namely the “southern hills” LLA which overlooks the site from north of the A891. The LVIA also correctly identifies significant contexts such as the John Muir Way running immediately south of the site, two Sustrans cycle routes, Mugdock Country Park, Loch Ardinning, and the Ballagan Falls SSSI. (The prehistoric burial mound will be discussed under “historic environment”.)

The LVIA considers the visual impact from several key viewpoints, numbered 1-6, identified by name and in the map in LVIA Appendix 6. We agree that these are significant viewpoints, and will discuss them below.

Viewpoint 1 A891: The A891 is the main approach to the village from the East, as well as the main route out of the village to the east. The proposed development is acknowledged in the LVIA as having a “Large Adverse” impact⁹. Whether looking in or looking out of the village, the Design Statement is wrong to suggest that the north side of the road already has a “built-up” or “developed” look. Our photograph Figure 13 shows that the “built-up” appearance of the village ends promptly at Dunglass View, and the houses beyond this point are set back behind hedges and trees, having country house/farm characteristics, not village/suburb.

⁹ LVIA page 31: viewpoint 2; detail in Appendix 6 Figure 3 (two photos are labelled Figure 3)



Figure 17 View east along A891

According to the LDP, a cemetery will be built in the nearest part of the field on the right, with pavement extending to the cemetery entrance, only a little further than at present. According to the application 17/00434/PPP, the field would become built with houses, and pavements will have to extend far into the distance, beyond the hedge and trees and over into the cemetery site, creating a major extension of the built-up appearance, extending over the ridge which, according to the applicant themselves, forms a natural edge and limit to the views.

Viewpoint 2, The John Muir Way/Strathkelvin Railway Path: The Railway path is long established as an important and popular route for walkers and cyclists, both from the locality and from outside. It connects the village through Lennoxton to Kirkintilloch, canal networks and beyond. The John Muir Way in particular is a relatively new designation, which is attracting walkers and cyclists from across the world in increasing numbers of visitors through the village. The local community and businesses are only just beginning to explore the substantial potential of this new designated route. The proposed development lies right in the face of walkers as they approach the village, and will block their view of the Strathblane Hills. This is acknowledged in the LVIA as a "Large Adverse" impact¹⁰ and even by itself is a good reason to refuse the application. For less ambitious walkers from the village, the length of the path that is affected by the proposed development may be the whole extent of their walk.

Viewpoint 3 A81 (Devil's Elbow): The LVIA¹¹ acknowledges a "Medium Adverse" impact. In other words, the site is not well hidden and will have a visual impact on the approach to the village where no development is currently seen. Moreover, assessment considers only "drivers". Besides drivers, there are passengers, including many tourists, car, cycling and on tourist coaches, using the A81 as the main route from Glasgow to the Trossachs. The assessment considers vegetation in the summer state, while the views are much more open in the winter. Again, the development will confront the viewer, looking towards the Strathblane Hills LLA and the Campsie Fells in general, with a developed landscape, where little or no development is currently visible. The impact would be adverse and significant.

Viewpoint 4 Dumbrook Moor: The LVIA highlights that the site is visible from all the way across Dumbrook Moor, but concludes that the impact is "negligible". We strongly dispute this assessment. As the image in the LVIA clearly shows¹², the villages of Strathblane and Blanefield in their current

¹⁰ LVIA page 31: Viewpoint 2; detail in Appendix 6 Figure 4

¹¹ LVIA page 31: Viewpoint 3; detail in Appendix 6 Figure 5

¹² LVIA page 31: Viewpoint 4; detail in Appendix 6 Figure 6

configuration are completely hidden on approach over the moor (for example from Mugdock Country Park), and also on approach from the A81 South. According to the LVIA, the roofs of the proposed houses will be visible, breaking this configuration and ruining the unspoiled aspect from Dumbrook Moor. The applicant should accept that the Green Belt designation has been carefully established with all these viewpoints in mind, and has deliberately given a high priority and strong protection to the unique character of the area, both for residents and for visitors.

Viewpoint 5 Ballagan Nature Reserve: the Ballagan Nature Reserve, along with the prehistoric burial mound, is another precious asset which can in time be connected with the John Muir Way to enhance the experience for visitors and locals in the area. The LVIA Appendix 6 Figure 7 considers the impact of the proposed houses as “negligible”. It does not mention the impact of the proposed cemetery site. We strongly dispute this assessment. The authors cite the “visual association and the similarity of the proposal with the rest of the village in this view”. Looking at the photograph in the LVIA, a visual association and a similarity with the rest of the village is precisely what we do not see. The photograph clearly shows the Milndavie Crescent/Edenkiln development in the far distance, and only isolated country houses in the foreground. Again, as in the case of Viewpoint 4, we see that the village in its current configuration is remarkably well hidden from any viewpoint that is not actually within the village, or high above it. We see that this proposal, if allowed to go ahead, would completely ruin that effect and transform the character of the local landscape, spoil the setting of the village for residents and visitors, and spoil the setting of the sites of natural and historical interest that are immediately nearby.

“Viewpoint 7” footpath to South: An additional significant viewpoint is not considered in the LVIA, namely the approach from the footpath that approaches directly south of the site shown in this map¹³:



Figure 18 Map showing John Muir Way/Strathkelvin Railway Path running east-west and right-of-way running north-south

The location of the footpath looking south over the proposed site is shown in our photograph, Figure 19. There is a long term and highly effective programme of development of the network of paths in this area, led by the Paths Development Group (PDG) of the Strathblane Community Development Trust. This path, which can provide a walkable link from the village and the John Muir Way/Strathkelvin

¹³ LVIA Appendix 5, third map

Railway Path to the Loch Ardingning Nature Reserve, is high on the agenda of the PDG, although active projects have been concentrated at the other end of the village at present. Walkers approaching the village from this direction would be completely fronted by the development, spoiling the foreground with the LLA behind.



Figure 19 View south over the site (blue arrows indicating right-of-way approaching from the south)

The applicant should confirm whether there has been any consultation with the bodies responsible for management of the path network, and the John Muir Way in particular.

In conclusion, we consider that the evidence filed by the applicant, and the strong opinions shown by the local community, highlight the adverse impact that the proposed development will have, far greater than any developments that have gone before in the local area.

As mentioned already, the developer of the Braidgate development has failed to perform the most basic landscaping obligations for the screening of that site. Many residents suspect that the same developer is waiting in the wings, hoping that Gladman Developments are successful in the present application. Accordingly, we attach very limited value to the boundary treatments proposed in the illustrative masterplan, which may not be respected, even if they are made conditions of some eventual approval.

Historic environment

The objection letter that has been received from Historic Environment Scotland¹⁴ says more than enough why this application should be rejected, and we urge the authority to follow the strong guidance received from HES.

The HES letter highlights that the applicant cannot be trusted in its reporting of consultation¹⁵.

The HES letter considers and rejects as inadequate the “mitigation” measures proposed by the applicant and discussed as “improvement” in the Design Statement. Currently, the view from the mound is the open fields and the backdrop of the LA and the views south (Figure 20). HES agrees that

¹⁴ 17_00434_PPP-HISTORIC_ENVIRONMENT_SCOTLAND-502604

¹⁵ “Section 4 of the Historic Environment Assessment refers to a telephone conversation and states Historic Environment Scotland accepted that the proposed housing development to the west would be at a sufficient distance from the mound. Historic Environment Scotland does not recognise this statement.”

the clearing of the conifers from around and on top of the monument would improve its setting, but not if the view becomes one of suburban houses and gardens!

The proximity to the John Muir Way and the Ballagan Glen Nature Reserve highlights the potential to develop this rare prehistoric site for local and tourist interest, to the economic benefit of the village and the connected economies. The setting of the monument must be preserved, or this potential will be seriously degraded.



Figure 20 View from ancient burial mound

In conclusion, the applicant's Historic Environment Assessment and Design Statement are delusional, in pretending that the proposed development is "predicted to lead to a beneficial effect on its setting".

The applicant's own archaeological survey highlights that "there is a concentration of prehistoric remains in the Strathblane area and that it was possible that additional prehistoric remains may have been preserved as subsurface features."

Sustainable development

We support the LDP's aims of sustainable development, in all aspects. We reject the present proposal, as it disregards those aims, and will only create longer term problems for the community, and the wider infrastructure. In particular, a large number of additional private market houses is not required, and will only perpetuate the legacy of imbalance in housing types and tenure types, that is already causing difficulties for this community.

Social and physical infrastructure - School and preschool

In arriving at the spatial strategy of the LDP, the council and consultees have fully assessed the capacity of primary schools and secondary schools in this rural area, the scope for expansion within each catchment area, and the ease of adjusting catchment areas.

The LDP, Supplementary Guidance SG 15 says:

"Balfron High School is currently operating at 98% occupancy. This includes a number of placing requests both from within and outwith the local authority area. Development within the catchment area will be accommodated by reserving spaces, but this requires ongoing discussions with developers when the school is at such high levels of occupancy."

In other words, the LDP's restriction of expansion in the rural villages is deliberate and directly connected with the difficulty of increasing capacity efficiently, in a rural area where there is only one high school catchment. Increasing the school age population in the rural area implies increased traffic as well, whether pupils use the school buses to Balfron, or cars/buses to schools in Glasgow.

The vast majority of residents responding to our survey are concerned about the negative impact on primary school, nursery and secondary school provision¹⁶. Among the few voices in favour of the development, a key motivation is that it will bring increased investment and renewal of school facilities. From the local authority's own resources, it is clear that the authority sees scope to provide increased capacity only in the Stirling core area. To permit a random development contrary to the plan will only make the task of the local authority more difficult, in already difficult times.

While the village badly needs investment in the school facilities, the present "in principle" application provides no developer with whom such contributions can be discussed. In order to overcome the difficulties identified in the LDP process, such contributions would have to be disproportionately increased. If a developer cannot accept that, then permission should not be granted.

Social and physical infrastructure – Waste Water (Sewage)

Enquiries made by Strathblane Community Council confirmed that there is not sufficient capacity for this development in the Strathblane Waste Water Treatment Works (WWTW). We are confused why the Scottish Water letter of 19 June 2017 suggests that there is. In any case, the letter makes clear that it is no guarantee of service.

Information available publicly from Scottish Water indicates capacity for only 48 housing units¹⁷, which is less than the proposed development. Moreover, a large proportion of that 48 would be used by for developments already approved or contemplated in the Local Development Plan. As Scottish Water "does not reserve capacity", none of these approved developments, including the large site south of the A81, has yet been counted in the capacity figure. Anecdotally, overflows of foul water from the treatment works are already a regular occurrence.

The vast majority of residents responding to our survey are concerned about the negative impact of this development on sewerage provision¹⁸. To allow this application would not only more than use the existing capacity, but would remove capacity for planned developments. This would certainly need to be addressed in the developer contributions, if the present application were to be approved.

Roads and Public Transport

Of the residents who responded to our survey, 91% are concerned about an increase in traffic if this development were to go ahead¹⁹. Features of the road layout at the recently completed Braidgate development are already causing concerns about accidents.

We have considered the Transport Assessment provided by the applicant. Despite what is said in the application, the Transport Assessment fails to support the application, and is flawed in key respects.

¹⁶ Appendix 3, question 10

¹⁷ Appendix 4 : Asset Capacity Search result for local postcode [\[link for review\]](#)

¹⁸ Appendix 3, question 10 (statistics and comments)

¹⁹ Appendix 3, question 11

With regard to public transport (buses), even on the analysis presented in the report, the entrance to the site is said to be 485 m from the nearest bus stop, meaning that the whole site is plainly beyond the 400m recommended distance for sustainable development.

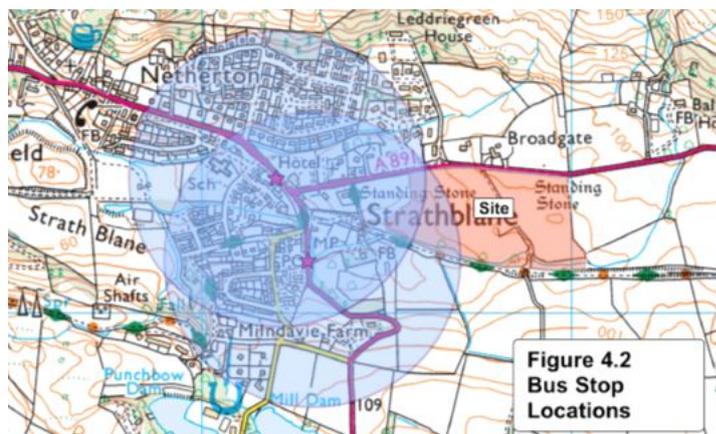


Figure 21 Bus stop locations

According to the illustrative masterplan, walking distances within the site could exceed 200 m. The report suggests at one point that a shortcut would be available through the John Muir Way, but that is clearly a mistake. There is no route via the John Muir Way to the southern bus stop shown, or to other services, except by returning to the A891, opposite the church. Such a walking route is therefore longer, not shorter, than a direct exit through the site.

Figure 21, taken from the applicant's report, shows how the existing settlement, including the site identified for development in the LDP, lies within the 400 m circles, while the new site lies plainly without. Therefore, the use of bus transport (even if there were adequate bus transport for most users) would not be sufficiently encouraged.

As local residents know, there is not an adequate bus service to support and encourage commuting by public transport, whether for workers, school children, shoppers or students. The only bus routes, with very limited frequency and hours, are between Balfron and Glasgow. There is no realistic bus service, for example, to our main hospital, at Larbert.

Concerning private car transport, residents in a development of the type proposed would be almost entirely commuters to Glasgow and highly dependent on private car transport. In the consultation on The neighbouring authority, East Dunbartonshire Council also made submissions against expansion of Stirling's rural villages, in the Main Issues Report prior to the current LDP²⁰. Transport issues such as commuter traffic, and conflict with tourist traffic were highlighted. New development in the

²⁰ Sustaining rural communities, MIR response 62/1/2: "East Dunbartonshire Council supports the principle of sustaining rural communities through appropriate small-scale development for housing and business development. However, it will be necessary to ensure that there are no adverse impacts in visual terms or traffic terms on the communities of East Dunbartonshire from any proposed expansion. Any expansion in the western area should be modest, taking into account the potential traffic impacts on both the A81 and A891 corridors connecting Strathblane with Milngavie and Lennoxton respectively. The area north of Milngavie, including the Milngavie Reservoirs and Mugdock Country Park, is an important tourism asset for East Dunbartonshire and the A81 is already a relatively busy road. It is therefore considered important that a realistic approach is taken in terms of the sustainability of expanding rural villages, and that any such proposed development is accompanied by a robust transport appraisal prior to the approval of any expansion."

Bearsden/Milngavie area is exacerbating the already inadequate park-and-ride facilities at Milngavie station.

The vehicle "trip rate" estimates that are used in the Transport Assessment are plainly too low. They assume as an "inflated worst case" scenario that each house will generate 0.5 vehicle trips in the morning rush-hour and 0.5 vehicle trips in the evening. Anyone considering the pattern of commuting to/from work and school in Glasgow or elsewhere knows that this figure is absurdly low. Most of the houses will be family houses, and most of them will generate at least one car trip per rush-hour. Trying to understand where the figures in the Transport Assessment have come from, we have studied the supporting materials. In the Appendix C of the Transport Assessment (See extract in Figure 22 below), it is revealed that the Trip rate predictions are based on "suburban" and "edge of town" precedents. Apparently, the statistical database recognises "free-standing" and "village" scenarios, but for whatever reason these were not used.

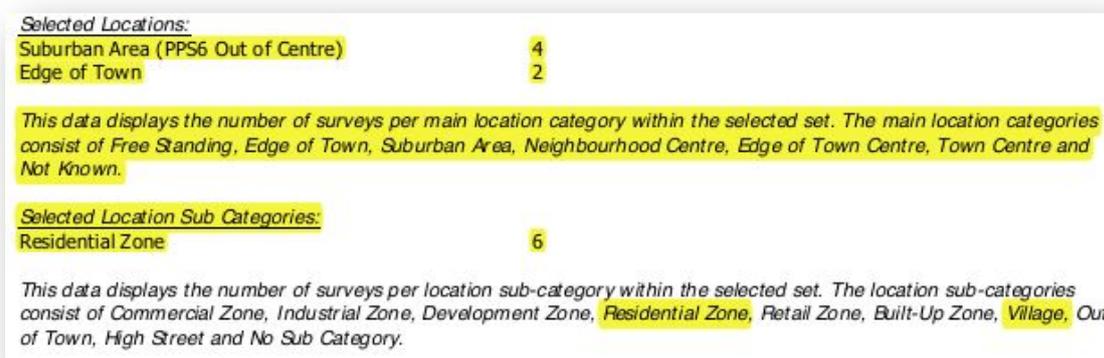


Figure 22 Extract from Transport Assessment, Appendix C

In short, we would suggest that the additional traffic flows generated by this site will likely be double or more, those assumed in the applicant's Transport Assessment.

The Transport Assessment ignores the increase in traffic which is already expected from developments in the villages to the north of Strathblane/Blanefield. The Transport Assessment also ignores the major flow of commuter traffic, not casual trippers, which arrives through the village from Lennoxton, and turns left to Glasgow. The Transport Assessment also suggests that drivers from the new development heading for the Stirling would turn right along Campsie Road, which is not the norm in practice. Those journeys, too, would impact the roundabout and the A81, heading north through Strathblane and Blanefield.

Biodiversity

We note the content of the Habitat and Protected Species Survey²¹ provided by the applicant. In the section 7, "Discussion and recommendations" it is reported only that "One designated site of European importance (the Endrick Water SAC) was identified by the desk study within 10 km of the Site, which is also designated as a SSSI at a national level." However, in the body of report, section 6.2.2, it is made clear "The desk study additionally identify[sic] two statutory designated sites of national importance within 2 km of the Site (Ballagan Glen SSSI and Dumbrock Loch Measdowns [sic]

²¹ 17_00434_PPP-PHASE_1_HABITAT_AND_PROTECTED_SPECIES-496584 [\[link here for review\]](#)

SSSI), which are designated for their woodland and grassland habitats (Table 1).” No explanation is given, why these are disregarded in the final conclusion, especially when the Ballagan Glen²² site is so close.

Nevertheless, the report section 7.1 “As such, it is recommended that consultation is undertaken with SNH and Marine Scotland to confirm and agree this position.” Given the impetus to proceed with developments, once planning application in principle is granted, we submit that such consultation must be completed before any permission is granted, not after.

Many residents have been concerned about the impact on birdlife especially, if this development were to proceed. While the applicant’s expert apparently saw only one raven during the field study, herons and other birds are regularly seen. It is not clear at what time of year the survey was performed.

Residents contributing through our own survey have particularly highlighted the loss of nesting sites for the “red list” species such as lapwing²³. Already the archaeological survey conducted for this gratuitous planning application is reported to have disrupted the nesting of lapwings.

Cemetery Provision

There is a very limited number of plots left in the existing cemetery and Stirling has allocated resources for development of a cemetery on this site. When the Braidgate 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 specifically 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 Braidgate site, and a new site for the cemetery would be established, also establishing a robust Green Belt boundary.

The present 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 the intended rural character of the cemetery can be achieved. If the cemetery were relocated, as Gladman proposes, it would need to have an entirely different character, with full parking provision. Of the residents who responded to the survey, 91% were against moving the cemetery²⁴.

This more developed appearance would undermine the landscape setting even further along the valley, and going beyond the natural landscape boundary, which is identified by the applicant itself.

A pavement and lighting would need to be provided all the way out to the new cemetery entrance, further extending the “urbanised” appearance on the approach from the east. In terms of access on foot versus cars, it should be remembered that cemeteries are visited not only by funeral parties, but also by bereaved relatives, visiting graves for the rest of their days. Naturally such visitors tend to be elderly, who would be least able to endure the extra hundreds of metres walk in all weathers.

²² <https://scottishwildlifetrust.org.uk/reserve/ballagan-glen/>

²³ Appendix 3, question 21 comment 81: “The recent earthworks carried out in the proposed area disturbed many ground nesting birds and stopped the lapwings from nesting. Lapwings are a “red list” (the highest level of conservation) protected species (...) Lapwings used to nest in the Cala field [Braidgate].”

²⁴ Appendix 3, question 9. One of the other respondents was in favour of moving the cemetery “but not for housing”.

Housing supply/Effective housing site

We strongly support the LDP in directing the bulk of the housing allocation for the Stirling area to the “core area” where infrastructure such as schools can be provided efficiently, and where sustainability goals can be met, for example by avoiding reliance on private cars and road transport generally. We know that the present applicant, and other parties such as Homes for Scotland have challenged the Proposed LDP as to the total allocation of housing land for the Stirling planning area, and all parties await the decision of the Reporter, following the hearing in June 2017. However, for reasons explained above, the site is unsuitable under so many of the other policies of the LDP, that the application must be refused, regardless of any increase in the total allocation.

Neither the community council, nor the community as a whole, is against the provision of additional housing, of appropriate types and in appropriate locations. This is confirmed in our responses throughout the local development plan process, and also in responses to the current survey. A sizeable minority (30%) of the residents responding to the survey believe that we currently have the correct mix of housing types, while a small majority (59%) believe we do not²⁵.

The types of housing needed by the community, according to the LDP, according to the response from Housing, and according to the survey of our residents are very specific:

- affordable housing,
- shared ownership housing and
- housing adapted or adaptable for the elderly/disabled.

With regard to elderly/disabled housing, this should be bungalows and other accessible units adapted to the elderly and infirm, and to changing requirements. The provision of such units to which existing residents can “downsize” would free up the existing housing stock over time, and contribute greatly to sustainability. Among the responses to the survey by non-residents, it is highlighted that a resident who became disabled, who had lived in this village all their lives, was forced to move to another village, to find suitable accommodation. The applicant for “planning permission in principle” is in no position to address these needs, and certainly does not have these needs as a priority. Any promises that would be made in connection with this application would be worthless, being given only in the interests of breaking Green Belt and opening the door to whatever development is most profitable on this and other sites.

Among the demand for affordable housing, some specific pleas have been made for larger houses (3 to 4 bedrooms) In other words, affordable housing for growing families is needed, but the illustrative masterplan indicates that the affordable houses should only be 2-3 bedroom units. Units of “2 to 5” bedrooms are reserved for market pricing.

With regard to the appearance of the development itself, the Design Statement suggests it is based on typical houses of the area. However, in the immediate vicinity of the site, apart from the Braidgate development, houses are diverse, country houses in individual settings. The residents responding to our survey were clear that the development threatens the “village” character. We are not reassured by the fact that several passages in the Design Statement referring to the “townscape”²⁶. In effect, the introduction to the Design Statement pays a lot of attention to the character of the “village”, but the

²⁵ Appendix 3, question 12

²⁶ Design Statement section 2.5 and 4.6.

illustrative masterplan itself promises that what will be delivered is nothing more than a generic “townscape”.

It must also be considered whether the site is “effective” for delivery of housing. As we know, the upper part of the field is designated for a cemetery extension. If the landowner refuses to sell the land for cemetery use (which would be at a premium, relative to its agricultural value) then a lengthy compulsory purchase process may begin. The duration of that process depends on the approach adopted by the landowner, but it does mean that the site is not free of constraints, and therefore may not be considered “effective”.

Potential Conditions in the event of approval

We fully expect Stirling Council to refuse the application, in line with the Local Development Plan. No exceptional circumstances or material considerations have been shown that might support a development in the Green Belt²⁷, and we regret that the officers and councillors, like ourselves and our residents, are dragged through the decision process by this determined applicant. By the same token, we also anticipate that the applicant is likely to appeal any rejection, and that we have to provide very full submissions at this stage, for them to be considered by a Reporter on appeal.

For the same reason, while we anticipate that the application and any appeal will be rejected because it is so clearly against the Local Development Plan and the local and national policies reflected in it, **as a precaution**, we mention some additional conditions that should be applied, in the event that the application is for some reason allowed. These are of course in addition to all the conditions that are suggested by the other consultees.

- Community involvement
 - Any permission granted must be subject to extensive and meaningful cooperation between the designers/developers and the local community, who have both the knowledge and the interest to ensure that any development is as fitting, and is well integrated to the community as possible, if it is forced upon us. With leadership from the community council, the community has demonstrated a willingness to cooperate with developers, for example on the layout and operation of the Braidgate site.
- Housing supply: Conditions would need to be applied, so that the development delivers exactly the types of housing and tenures that are missing for the needs of the local community.
 - These would include a substantial number of accessible bungalows suitable for elderly/disabled owners downsizing.
 - Affordable homes, both to rent and for shared ownership, must be provided, including family homes of all sizes.
 - The proportion of affordable homes, should be higher than the minimum 33% set by current policy. A level of 50%, for example would allow both social rented and shared ownership to be included. The level of 50% was imposed on the neighbouring Braidgate development by the Reporter examining the current LDP.
 - Of the units for private sale, a first tranche of houses for sale should be discounted to local people, and a Rural Housing Burden applied.

²⁷ LDP policy 1.5, supported by SG03.

- The total number of houses should be strictly limited to 70, and preferably many fewer. (The landscape impact and historic environment impact suggest this will be necessary in any case.)
- Landscape and visual impact:
 - All of the mitigating measures suggested in the Design Statement must be applied in strictly enforced conditions.
 - The provision of single story (bungalow) houses at the upper part of the site will assist in this (as well as meeting the community need for accessible housing for those with particular needs).
 - Increasing the distance between houses and the Blane Water and its floodplain, for example by increased density and/or reduced number of units).
- Historic environment:
 - All the conditions proposed as a fall-back by Historic Environment Scotland must be imposed and enforced.
 - Site improvement, interpretation and path connections measures must be provided and/or supported financially.
- Social and physical infrastructure - School and preschool
 - Developer contributions must be committed not only to the normal level, but in excess of the normal level, to compensate for inefficiencies and challenges presented to the education authority by unwanted expansion in the preschool, primary school and Balfron High School catchment area.
- Social and physical infrastructure – Waste Water (Sewage):
 - Developer contributions must be provided to upgrade the Strathblane WWTW to at least its present capacity, plus capacity for proposed development.
- Roads and Public Transport:
 - Developer contributions to enhance bus services must be made, to minimise reliance on car transport and improve bus services for the whole community.
 - This certainly includes improved frequency and cost of the bus services on the A81 to Glasgow.
 - Contributions may additionally be requested for “local loop” bus services that are under discussion for the local area.
 - Contributions may additionally be requested for buses to connect along the Campsie Road into Lennoxton and beyond, for example Larbert hospital. Currently there is a bus route as far as Campsie Glen/Haughhead, which could be extended with some cross-border co-operation.
- Biodiversity
 - We would like to know what conditions are proposed by Scottish Natural Heritage and similar bodies.
 - Mitigation measures suggested in the Habitat and Protected Species report submitted with the application must be strictly applied and enforced, not only in the development, but as continuing obligations on the residents and factors of the new development.
- Cemetery Provision
 - Suitability of the second field for cemetery provision, and detailed designs and construction of the cemetery shall be agreed and approved, before any works on the first field.

Conclusion

The applicant claims to have paid attention to the results of the pre-application consultation, but the community view is that they have not addressed any of the concerns raised. The applicant is on record as saying that pre-application consultation is a waste of time, and they give the impression that their view of that has not changed.

Likewise, the community has paid attention to the submissions of the applicant, but finds nothing to override the careful consideration of many factors that has gone into the development of the current Local Development Plan. The application should be rejected.

In the event that the application is allowed, this must be considered exceptional, and exceptional benefit, for example by conditions of the type set forth above, must be imposed. The development is promoted against the wishes of the local community and the planning authority, and against the considerations of the Local Development Plan. Regardless of whether Planning Permission in Principle is granted, this will not make it a goal of the community or the authority to ensure that the development is delivered, except in return for concrete, watertight benefits, on which the whole community has been consulted and satisfied.

Yours faithfully,
for Strathblane Community Council

/John Gray/

(Joint) Planning Correspondent

Enclosures:

- Appendix 1 - Strathblane CC response to PAC, December 2016
- Appendix 2 – Strathblane CC community survey document
- Appendix 3 – Strathblane CC community survey results (residents only) June-July 2017
- Appendix 4 – printout from Scottish Water Asset Capacity Search, 4 August 2017



17/00434/PPP

**Land 160 Metres South Of Broadgate House,
Campsie Road, Strathblane**

Representation by Strathblane Community Council

7 August 2017

Appendix 1 - Strathblane CC response to PAC, December 2016



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Appendix 2 – Strathblane CC community survey document



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**Appendix 3 – Strathblane CC community survey results (residents only)
June-July 2017**



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**Appendix 4 – printout from Scottish Water Asset Capacity Search, 4
August 2017**