

Issue 42

# Dunblane

## Reporters' Recommendations

The local development plan should be modified by:

1. Allocating suggested site SS31 for some limited housing development, with Key Site Requirements that would include identifying the need to address the vehicular access difficulties and for sustainable drainage. *(NB This site is at Whitecross)*
2. Deleting site H021 and amending the proposed green belt boundary to include and cover the site. *(NB This is Kippendavie Group Trust's site for 100 units of housing)*
3. Altering the settlement boundary to incorporate the remaining permitted house plots on the former reservoir site on Upper Glen Road, bringing them into the built up area of Dunblane.

## Reporter's Conclusions

### General

1. The planning authority states that it has changed the capacity figure of 100 for the Dunblane Waste Water Treatment Works in the Dunblane settlement statement as a nonnotifiable pre-examination modification to the proposed local development plan (LDP). On that basis, the concerns appear to have been resolved and no further response is required.
2. **Laighills Park** was considered for designation as a local nature reserve during the LDP process, but that possibility did not have significant public support. No further evidence of support for the designation has been presented to this examination to justify amending the LDP. That said, there is scope to reassess the matter in future reviews of the LDP and via the separate but parallel process of the Stirling Council open space strategy.
3. **The North Stirling Woodland Park** is not a specific LDP proposal and it is not shown in the LDP Spatial Strategy or on the Dunblane settlement proposals map. The park is mentioned in the Dunblane settlement statement text, but only in the most general terms. The text links to the Stirling Council Open Space Strategy, where the park seems to originate (CD56). Potential component parts of the park are then examined in greater detail in the open space audit for Dunblane (CD58), which in turn, links to a concept statement and consultation document (CD60). While it is appropriate for the LDP to cross-refer with the open space strategy and to support the principle of the park, the LDP should not pre-empt or prejudice that separate process. Further, the above confirms that public consultation and a clear statement of what the park might mean and entail is to be expected in due course.

### Town centre

4. Dunblane town centre is categorised as Tier 3 in the Network of Centres hierarchy in proposed Supplementary Guidance SG09: Network of Centres (Map 5, CD176). The guidance and the LDP text confirm that the town centre boundary has been drawn tightly to

reflect its local shopping role, as well as its other non-retail functions, and its potential to attract more visitors. The representations would prefer a bigger town centre, potentially incorporating the police station on St Blane's Road.

5. The planning authority's various retail capacity studies (CD68, 69 and 70) and my site visits confirm that Dunblane town centre is not performing well. Trading levels are low, many shops are empty and investment in the fabric of the buildings looks at best partial, all despite the town's sizeable population and the amount of potential retail expenditure capacity that should produce. In part, these conditions result from expenditure being lost to Stirling. The potential to break that habit and to attract spending back to Dunblane town centre is limited, and hampered further by accessibility and parking congestion issues in the town centre. Simply making the town centre bigger would not address these issues or help make the town centre more attractive and vibrant.

6. The defined town centre boundary reflects the historic and commercial function and heart of the town, which tends to be inward facing and focused broadly along High Street, between the cathedral and Perth Road. The centre also reflects the variable ground levels that drop significantly from Beech Road, down to the river valley floor. The police station sits at a much higher level and faces out across Perth Road, so it does not follow the same pattern or read as a natural part of the town centre. Equally, the riverside area south and east of the Perth Road is also distinctly separate from the naturally distinctive town centre.

7. There are several premises in the town centre, including on the High Street, that are much in need of refurbishment. That work would improve the appearance and attractiveness of the town centre significantly, especially as a tourist destination. The LDP recognises the general need for this and confirms that the planning authority will develop a strategy for Dunblane, where these necessary refurbishments will be identified (page 149 paragraphs 1 and 4). The LDP cannot force rehabilitation proposals for individual properties, and Scottish Planning Policy (SPP) confirms that the proper place to identify and detail specific public realm improvements is in such a town centre strategy (paragraph 60).

### **Barbush**

8. A substantial site at Barbush was allocated for a mixture of housing, recreation and business in the adopted local plan. Part of the area later became a Strategic Employment Opportunity site in Alteration 1A to the adopted local plan. The area was then reviewed as NEW40 (CD45) at an earlier stage of the LDP process, and planning permission now exists for a total of 19 homes across 2 sites within it. These permissions were granted on 29 March and 26 November 2012 respectively and implementation has begun (references 11/00784/FUL and 12/00611/FUL, CD137 and CD139). The planning authority states that the permissions were too late to be recognised in the table of allocations for Dunblane. To rectify this, the authority would take them into account in the subsequent action programme for the LDP. The omission is clearly an accident of timing that the authority is now willing to address. However, Circular 6/2013: Development Planning states that the LDP action programme is to set out how the authority proposes to implement the plan (paragraph 130). In other words, the action programme is not intended to update and alter the plan's provisions.

9. The Spatial Strategy text identifies a new convenience "superstore" at R08, which is then carried forward into the Dunblane "Existing and Future Land Supply" table. The planning authority's retail expenditure capacity study predicts that Dunblane can only support less than 800 square metres net of additional floorspace (CD69 and CD70), which is not enough to bring a qualitative convenience retail benefit for the town. Because of that, the LDP allocation has been increased to 3900 square metres gross, which equates to a smaller superstore type development that the planning authority believes would achieve qualitative benefit. The lack

of scope for infill and redevelopment generally in the town centre, but more especially for a development of that size, has then effectively forced retail development out and onto the brownfield former quarry site at Barbush R08. The Key Site Requirements for R08 then record that at June 2011, the site already had planning permission for a supermarket. The planning authority also granted a subsequent full planning permission on 23 October 2012, for a foodstore and petrol filling station (reference 12/00289/FUL, CD136). The Key Site Requirements for the R08 allocation do not mention this later permission and the planning authority states that it has rectified that as a nonnotifiable pre-examination modification of the LDP. However, because the permission for R08 does not restrict the sale of non-food goods from the premises it would be inappropriate and contradictory for the LDP now to impose that kind of restriction.

10. Planning permission exists for a retail development at R08 and that will remain so, irrespective of any LDP allocation. The application was granted recently and it must be assumed that it will be implemented. The representations argue otherwise, but no firm, quantifiable evidence has been supplied to support that belief or to show any basis for an assumption that the permission could be revoked. The planning authority's retail capacity studies leave no doubt that if R08 proceeds, as must therefore be supposed, there is no spare expenditure capacity in the Dunblane catchment. Based on this, it would not be appropriate for the LDP to allocate more retail sites.

11. The planning authority also states that it has amended the site area for the employment/retail allocation B28 in the Dunblane "Existing and Future Land Supply" table as another non-notifiable pre-examination modification. That change would accord with the planning permission that was granted after the LDP was prepared (reference 12/0289/FUL, CD136). While the knock-on effect of that change would be a reduction of the overall business land supply for the whole LDP area, the loss of 0.08 hectares cannot be regarded as significant in that overall context and the concerns would appear to have been resolved. No further response is therefore required.

12. The Key Site Requirements for B28 and for housing site H020 do not mention cycle provision. However, the Transport and Access Background Report (CD71) to the LDP highlights the need to encourage less use of motor vehicles and more use of sustainable transport options, including cycling. The LDP Vision supports this, especially with the change recommended for Issue 2, which is to incorporate specific reference to cycling for developments in the smaller towns and villages. The objectives of the relevant representation are further covered by LDP Policy 3.1, especially by part (b), which aims to reduce travel demands and to encourage safe and realistic choice of access, including by cycling. The policy is supported by the planning authority's proposed supplementary guidance SG14: Ensuring a Choice of Access for New Developments, which includes detailed requirements for cycle provision, up to and including new routes (CD178). For example, specific minimum requirements are set out in SG14 in Table 1, and Appendix A also addresses specific cycle matters. Lastly, cycling is covered for some developments by Policy 3.3, including explicitly under part (d)(i). Again, this policy is augmented by proposed Supplementary Guidance SG16: Developer Contributions (CD180), which expects the provision of necessary infrastructure to support new development, including for cycling. Taken together, all of this achieves the objective of the representation, without the need for duplication in the LDP Key Site Requirements table for Dunblane.

### **Holme Hill**

13. The LDP allocates site H020 at the bottom of Holme Hill, for a development of 10 affordable homes. The representations argue that the site is not divisible from the rest of thill

and it should be safeguarded from development and designated as open space and green corridor to match the surroundings.

14. H020 is one of few infill housing development options that the LDP identifies in the Dunblane settlement boundary. The site contains areas of hard standing, it is to some extent brownfield because it has been occupied by buildings that are now removed, and it is self contained and divisible from the rest of the hill by virtue of a substantial stone wall and fences. The site contains attractive mature trees that are protected at least because they are in the conservation area, so that some reduction of amenity and biodiversity would result from felling them to make way for development. However, enough green space would remain to maintain a link across Perth Road in terms of the Green Corridor that is subject of LDP Policy 1.3. Further, that site is on a main road and it is the closest allocation to the town centre, whereby it is a suitable option for affordable housing. The settlement specific LDP text for Dunblane confirms that the town is a highly pressured area where house prices are high, so people on low incomes tend to be excluded. Because of this, there is a critical need for affordable housing. While the exact details of how the H020 development might be delivered properly fall to be considered at application stage, the Key Site Requirements for the site address many of the concerns expressed about the form of development. For example, as many mature trees as possible should be protected, development should not face Perth Road, it should be accessed via the existing entrance onto Bogside, and the housing should be designed to suit the conservation area. It is reasonable to assume that the planning authority will not disregard these requirements and the LDP should not be modified.

15. The remainder of Holme Hill is designated on the Dunblane proposals map as a Green Corridor and an Open Space Audit site. From there, Policy 3.1 applies a general presumption against loss to development, other than in very particular and exceptional circumstances. Other representations seek to have that designation lifted, to allocate additional ground at Holme Hill for development. The suggested sites are SS35 and SS36, which together could add a total of 26 homes to the housing land supply. SS35 forms a westerly portion of the hill area. SS36 faces Perth Road and would fill the gap between H020 and the existing housing. SS37 is also proposed for office development and it is positioned to the west of the existing housing along Perth Road. In combination, these sites would amount to around half of the Holme Hill area that is meant to be safeguarded as described above. The representation offers that if the housing sites were to be released, then SS37 would be abandoned and the remainder of Holme Hill would be gifted to the community.

16. The evidence to the examination shows that the area has a complex planning history, which includes a section 50 agreement about maintenance of the hill area that was made in 1987 in the context of planning permission for a house. The terms of this agreement seem to be the subject of an on-going dispute between the owner and the planning authority.

17. More recently, a planning application was submitted and then withdrawn for 19 homes on SS35 (reference 11/00788/FUL, CD134). After that, planning permission was refused in February 2013 for an office development on a site that broadly matches SS37. That

permission was refused largely for harm to the character and amenity of the conservation area and for natural heritage, all in the context of a range of adopted local plan policies (reference 12/00544/PPP, CD138).

18. All these suggested sites were considered as part of the LDP site assessment process but were ruled out for reasons that include:

- loss of this green heart that is important to the character and amenity of Dunblane and that may have considerable historic and cultural significance;

- the value of the remaining green space would be considerably diminished;
- ground levels around the hill are steep, so that development would be especially
- intrusive for townscape and in important views around the cathedral that should be preserved;
- steep ground levels also reduce the ability to design development to suit the traditional character of the conservation area and the nearby listed buildings; and
- SS36 would establish a ribbon of development along Perth Road, which the Key Site Requirements for H020 set out deliberately to avoid.

19. Holme Hill is a central, very attractive and important townscape feature of Dunblane, and of the conservation area in particular, especially in terms of:

- its relationship with the cathedral surroundings;
- the edge that it gives Ramoyle, which is clearly an old and historic part of the town;
- the fact that it separates and distinguishes Ramoyle from the later 'spa town' character of development along Perth Road;
- the green character of the open space that the hill provides, along with the wide views
- from it, across and beyond large parts of the town; and
- the gate entrance, gatehouse, and high stone wall that characterise Perth Road opposite the Hydro hotel grounds and complex.
- The hill sides are also very steep, which means that access, parking and development would be difficult and more intrusive to engineer.

20. As a result, the Holme Hill sites would contribute to the supply of housing and employment land in Dunblane. However, all of the above shows the harm that would result from the loss of this valuable townscape asset that adds much to the high quality amenity, cultural and environmental character of the town. These negative effects more than outweigh the likely benefits and the sites should not be allocated.

### **Other suggested sites**

21. The representations also request the allocation of housing site SS31 at Whitecross, which is beside the Scouring Burn and almost opposite the entrance to Victoria School. The site was considered for inclusion by the planning authority as NEW41, but was rejected because of its value to the green corridor around the school and the cemetery, for potential access issues onto B8033 Perth Road, and for distance from the town centre.

22. The site is on the edge of Dunblane in a transitional area where the local character is gradually less urban and more green and rural. The Scouring Burn marks that transition. The burn is also an important wildlife and green corridor. However, the site is inside the LDP defined settlement boundary, beside and opposite an established urban area. The burn would remain as a well-defined and easily defensible urban edge, to strengthen the transition from urban to green and make it easier to maintain. Development could also be designed to integrate as an extension to Whitecross Avenue, in keeping with existing housing and, currently, the unkempt appearance of the site detracts from the local townscape and residential amenity of the vicinity.

23. SS31 is also far less peripheral than the housing site at Barbush, it has easy access to public transport along Perth Road, and it is convenient for the superstore that is planned for R08. Further, the burn corridor has a clearly defined edge by virtue of ground levels and trees, and there is no obvious general shortage of green space at this location. Other

development such as the new housing at Lawder Place and Bellenden Grove has already been allowed to encroach to a far greater extent that would result from the development of SS31 and enough open space would remain along the burn to maintain its integrity and green value.

24. Vehicular access is an undoubted issue on this bend in the Perth Road and, because of this, the existing houses all take access from side roads, such as Whitecross Avenue. In part, this probably dates back to before the main A9 trunk road was diverted around the Dunblane by-pass, but visibility around the bend is still a valid road safety concern. That said, the planning authority's site assessment sheet (CD45) provides no quantifiable evidence to show that an access solution could not be achieved. Instead, the Summary Transport Comments only state "Difficult to overcome existing issues unless applicant provides off-road parking for existing residents".

25. Based on this assessment, site SS31 should be allocated in the plan for some limited housing development although the Key Site Requirements should identify the need to address the vehicular access difficulties, as well as for sustainable drainage.

26. A former abattoir site at SS30 is also suggested for development of an unspecified nature. This brownfield site was considered for inclusion into the LDP as site NEW14, but it was rejected because the assessment process revealed significant and complex issues that would need to be addressed before development could proceed. For example, my site visit revealed that vehicular access is very problematic, being available only off Stirling Road, which is partly one-way, and through a narrow tunnel beneath the high, B8033 dual carriageway overbridge. Options for altering this arrangement are constrained because the site is bounded by the main railway line and the Allan Water. The location on the river bank is also inside the 1 in 200 year flood risk area, which suggests a high potential risk. Given that, SPP confirms that built development may not be appropriate (paragraphs 196 to 211). Accordingly, the site cannot be regarded as a realistic and effective development option and it should not be allocated. That is not to say that the planning authority would necessarily resist some form of suitable development, if that could overcome the above issues and accord with other relevant LDP policies.

27. The representations request various allocations on sites outside the LDP defined settlement boundary, which wrap around its east, south and west edges, as follows:

- SS38 to the east, which incorporates LDP site H021 and is suggested for an extensive mixed development comprising housing, a golf course and some retail, such as a garden centre or farm shop;
- SS39 to the south is proposed for a supermarket;
- SS29 to the south is proposed for a leisure/tourist facility of some 50 to 75 mobile caravans;
- SS32, part of SS33 and SS34, all to the south, are proposed for housing; and
- the remainder of SS33 to the west, and is also proposed for housing.

28. Taken together, these sites represent significant pressure for the expansion of Dunblane. To the south, the suggested sites would fill the whole triangle of the existing green belt that is defined by the A9, Stirling Road, and the existing southerly settlement edge. To the west, the sites would bring the urban edge to the A9 carriageway, and to the east, they would spread the town up west facing hillsides and into the countryside. In this direction, development would be highly exposed in views across the town and H021 in particular, would have an imprecise and unsustainable urban boundary. In contrast, site SS34 could be developed as a

self-contained and discreet extension to the town in a space that was clearly envisaged as a potential extension to the recent Douglas Place/Lindsay Brae estate.

29. Setting aside considerations that relate to the individual development types proposed, the settlement specific text for Dunblane explains that the town is highly constrained by:

- cultural heritage features of particular and in some cases national importance including Sheriffmuir battlefield, designed landscapes and listed buildings;
- environmental and landscape considerations such as the quality of the surrounding countryside, flooding, plus the need to protect the setting of Dunblane and maintain a separation with Bridge of Allan; and
- infrastructural capacity issues and town centre congestion.

30. While these constraints apply to the individual sites in various combinations and to varying degrees of significance, they are important collectively and they justify the LDP approach to Dunblane, which is to focus on consolidation and infill development, as opposed to major growth. The plan prefers to stimulate that growth elsewhere. Reversing that approach in favour of Dunblane risks jeopardising delivery of the fundamental LDP strategy. For all these reasons, it is appropriate for the planning authority to have opposed the totality of the proposed additional sites in the short-term.

31. For the longer term, Dunblane is a Tier 2 settlement in the Spatial Strategy hierarchy, so that it will very probably require to grow. From the geography around the town, the above sites combine to represent the only potential areas that might accommodate that future growth. Because it is extremely unlikely that they could all be supported, the planning authority must make choices in developing a strategic approach for subsequent reviews of the LDP, which would facilitate, plan and control growth. Part of that process will entail weighing up the benefits that development in each direction might offer. For example:

- improved facilities for the town as a whole;
- recreational and tourist enhancements;
- vehicular access improvements, especially along a major entrance to the town from the south; and
- masterplanning and structure planting to help contain and define a sustainable new urban edge. In the meantime, a proper, fully transparent, co-ordinated, comparative and wide ranging evaluation is required.

Further, bearing in mind the above comments about visual intrusion and the lack of defensible boundaries, it would be wrong to fetter the planning authority with a binding recommendation in favour of any of these competing sites. This conclusion applies equally to future housing site H021.

32. The LDP proposes no development for Upper Glen Road. Instead, land opposite, as well as broadly from "Pisgah" onwards, is to be in the green belt. However, detailed planning permission was granted in November 2011 for a total of 9 homes across 2 sites around the former reservoir that is located opposite "Pisgah" (references 11/00227/FUL and 11/00209/FUL, CD131 and CD132). My site visit confirmed that 5 of these houses are now virtually complete and work has begun on the remaining 4. The sites also face and arguable mirror an enclave of 7 large new detached villas opposite, around "Pisgah". A further information request has revealed that 3 more plots here also have some form of planning permission. Taken together, this amounts to a total of 19 new homes over the combined sites.

Given that, the representees' nervousness about the possibility of more development in the area is understandable.

33. The planning authority does not want to amend the new green belt boundary or to reflect these permissions by allocating the reservoir sites for housing in the LDP, but would take the altered position into account again via the subsequent action programme for the LDP. As stated above, the LDP action programme is not meant to be used as a vehicle to update and change any of the plan's provisions.

34. The reservoir sites add to the number of houses to be built in Dunblane and the above shows that the planning authority has been prepared to accept new housing development in the vicinity. The outstanding permissions could also be implemented irrespective of any LDP allocation or any reference in the subsequent action programme, and it must be assumed that they will be. At least part of the sites was also to some extent brownfield because of the former reservoir and associated buildings that occupied them. In addition, the plots opposite the former reservoir are in the defined urban area. Given all of that, it makes sense to include the remaining sites into the built up area of Dunblane and the settlement boundary should be redrawn to incorporate them. The new green belt arising would then be robust and could be defended more effectively against further development along Upper Glen Road.

35. Permission has also been granted in outline for an hotel and golf course at Park of Keir, on a site that is located east and south of the A9 roundabout, between Dunblane and Bridge of Allan (reference 02/00032/OUT, CD128 and CD129). The permission is dated 5 October 2005 and it is subject to:

- condition 1(c) that reserved matters must be submitted for approval in 3 years, i.e. by 5 October 2008; and
- condition 1(d) that development must start either in 5 years from the outline planning permission, which was 5 October 2010, or 2 years from the date of the last reserved matters approval.

This examination has no evidence of any reserved matters having been applied for or that development has begun on site. The planning authority received an application to renew the outline permission on 30 September 2008 (reference 08/00726/OUT, CD130), which was registered, but seems never to have been determined. As a result, the outline planning permission may now have expired unimplemented, whereby the site would no longer have planning permission. Despite that, the site is not in the defined settlement boundaries of either Dunblane or Bridge of Allan, so it would not be appropriate to allocate it on either settlement specific proposals map.

36. The representations also propose site SS28 by the A9 trunk road for services, including a petrol filling station and convenience shop. The representee believes that Transport Scotland would support such a proposal, but no firm, quantifiable evidence has been supplied to confirm that. In addition, SPP states that new junctions onto trunk roads are not normally acceptable, and direct access onto any strategic road should be avoided (paragraph 175). Bearing in mind that services already exist with an established access a short distance to the north of SS28, and that the submitted transport strategies do not identify a need for more, it seems unlikely that another similar development so close by could be justified. Because of that, the LDP is not allocating roadside services and has no specific policy to support them. Under all of the above circumstances, the requested allocation would not be appropriate.