

*Stirling's Draft Proposed Local Development Plan 2013-2033***Strathblane Community Council comments on the Draft Proposed Local Development Plan***Introduction*

Strathblane Community Council is pleased to have this opportunity to comment on behalf of our community on Stirling Council's Draft Local Development Plan along with the Open Space Strategy.

Our response is based on wide ranging consultations within the villages involving: two Community Council meetings, a well attended and constructive public meeting on the plan proposals, together with individual feedback – formal and informal – particularly following the Drop-in Session in the Village Club, and, most recently, on-line discussion in the Strathblanefield Group on Facebook. Whilst some differences of view within the community remain and some individuals understandably have concerns over possible developments that could affect them directly, our task has been made easier by the extent of common ground amongst the views expressed. It is heartening that so much of that common ground is shared with the Draft Proposed Local Development Plan.

We strongly support the Overarching Principles, including high standards of design, place-making and conformity with the sustainability criteria that must be considered in any planning proposal. We also strongly support measures to safeguard and enhance the historic and natural environment.

We agree with Stirling Council's Vision for villages and the surrounding countryside in general. For the working out of that development vision in practice over the next two decades, however, it is vital that residents are given a key role in determining the patterns development in their own communities.

Sustainable development in the social make-up and infrastructure is at least as necessary as sustainability in environmental terms. As the LDP recognizes the essential character of our community's 'place' requires carefully limited and balanced development. Sustainability involves not just open space but an integrated consideration of public transport, roads and traffic, water and sewerage, the right kinds of housing provision, and school re-development with related community facilities

More detailed comments follow. In summary the community view is as follows

- a) No-one is happy about a breach of the Green belt at either end of the village.
- b) At the same time the majority accepts that the community needs a number of affordable and particular needs houses, especially for older residents.

- c) Therefore all possible locations for such housing — including the site on the devil's elbow—must be carefully considered before resort to a breach of the Green belt — in the Singh Field or anywhere else.
- d) Only on the failure to find adequate alternatives would there be any support for housing in the Singh Field H106 and that only on very strict conditions.
- e) A Draft Plan which asserts the desirability of modest but significant population growth in the Balfroon/Killlearn/Strathblane corridor must give more consideration to the traffic implications for the A81 through Blanefield and Strathblane. The villages cannot be bypassed and therefore serious and effective measures must at last be taken to enforce the 30mph speed limit. For us this is a priority.

Comments on Green Belt

We strongly support retention of the Green Belt designation around Strathblane generally, and in particular throughout Mugdock.

We are pleased to see clarified policies & guidance on development in the Green Belt and Countryside, with the supplementary guidance in SG03, SG10 etc..

We strongly support the rejection of MIR sites STRA01, STRA02, STRA03, STRA05, STRA06, STRA07. We also support the rejection of new sites NEW28 and NEW4.

We agree it makes sense to adjust the settlement to include the site NEW1 below Glenarden. We note that this wooded site would require further justification before it was approved for housing.

We are opposed to the removal of portions of the Green Belt at the north west corner and request that the Green Belt be retained (i) north of the B821 and (ii) west of the A809. We understand the desire for a robust natural boundary, but it seems illogical to have Green Belt on one side of the road and not on the other. Seeing as the value of the Green Belt has been confirmed in your research, would it not be just as logical to expand the Green Belt to find a new hard boundary, rather than shrink it?

You should correct the statement that Strathblane is '12 miles from the Glasgow conurbation'. The conurbation includes Milngavie which is only 4 miles away, if that, and of Glasgow itself, the boundary is much nearer than 12.

We are surprised that there is still no mention of the Carbeth Conservation Area in the Settlement Statement for Strathblane.

In principle, we would oppose adjusting the settlement boundary to include the site H106 (STRA04, Campsie Road), currently in the Green Belt. If this adjustment is necessary to provide land for affordable and low-cost housing, then the release of this land must be accompanied by cast-iron provisions to avoid that it ends up being squandered on provision of higher value market housing. The pressure from commercial developers can be intense,

and it would be a tragedy if such a development takes place that would only exacerbate the current imbalance in housing provision.

We note that the southwest corner of the site H106 is bordered by very tall trees, that will cause shading to any property formed in that lower corner of site.

With regard to site NEW5, the reasons for rejection are understood, but there is a serious debate within the community whether this might be a better site than H106. Although it would be difficult to form a 'hard' boundary against sprawl, the same argument applies, possibly with more force, against H106. Although the NEW5 site is remote from central facilities, this end of the village could be bolstered by the additional residents. Road access fits well with existing speed reduction plans. However, safe walking routes would be needed to avoid isolation.

Comments on Housing

We understand that the bulk of new housing proposed will be in and around Stirling city (Stirling Core sub-area). We note that the allocation of need in the Rural sub-area is spread across all rural settlements and the countryside. This is a significant change from the previous Local Plan, which proposed development in just a few hubs (Doune, Callander, Balfroun). We welcome this change, which should lead to better sustainability of local communities like our own.

We note that Strathblane is identified a 'highly pressured' area, with a shortage of 'affordable' housing. The HNDA makes clear that low-cost ('bottom quartile') market housing is needed, while we have a 'surplus' of more expensive housing in the rural sub-area. However, we expect that developers will always see a market for more expensive housing. From our experience over decades, we wonder whether the intentions expressed in the policy can be delivered in the face of determined commercial forces.

We wonder where the number 50 comes from, and doubt that the site can support 50 units. Cala's proposal at MIR stage was apparently for 22 units. Does Stirling have a minimum number of units in mind, that the community needs? Is 50 units considered enough to rebalance the mix of housing types in the community?

We note that, at least where 20+ units are proposed on a site, 50% of the units should be affordable. This would presumably apply to development of site H106 and is crucial to any justification for permitting such development. But what happens if two developers split the land neither crosses the 20-unit threshold? It is essential that the affordable element be delivered on site, as we have no other sites in the community. It would be the worst possible outcome, if new houses were to be built in the current Green Belt, without the affordable/low cost housing benefits being delivered to our community.

As noted above, the HNDA says there is a 'surplus' of upper quartile market housing in the rural areas, and a shortage of lower priced (bottom quartile) market housing. Why then doesn't the LDP say that the market housing should be at 'bottom quartile' prices? We

request that this be written into the policies. Is this a topic for the mentioned Development Brief?

The landscape setting is precious, and the justification for moving the settlement boundary to allow housing is that the local community needs it. We consider it is essential that the local community drives the plans for development at all stages. We note a 'Development Brief' is required for the site H106, and presumably any alternative site that may be designated. Who prepares this Development Brief and at what stage? Can we be sure that the community will be fully involved in the production of this brief?

The draft LDP also requires developers to address the need for 'particular needs' housing (e.g. sheltered housing for elderly residents or wheelchair housing). This is welcome, as we have an urgent requirement for such housing which does not exist in our villages, but there is a shortage of sites. Stirling Council's Housing department has indicated a desire and capacity to build 6 bungalows for particular needs in our villages, yet this is not accommodated in the draft plan, or even apparently known to the planners. Please give consideration to securing sites for this type of development as a priority.

In addition to new build housing, is there not a potential to add to affordable housing provision by the council or other RSL purchasing existing properties?

The 20 units threshold for developers to make an affordable housing contribution is higher than at present. We oppose this increase, at least for the rural area, because it creates a push for larger developments, relative to the size of the village. Even under present policies, the special circumstances in our area mean that development tends to proceed by the infilling of one house at a time, and/or by the replacement or extension. In these circumstances, most developments give no benefit to the community.

Comments on Business/employment space

We note that Strathblane/Blanefield will be designated a 'Network Centre', with the consequence that shop-front premises will be protected against conversion to residential use. This is welcomed as we believe it is important to protect and support our local retail & service businesses.

Comments on Open Space Strategy

We agree that the existing open spaces within the villages should be protected against housing or business development, and central access to the green space must be protected, and/or enhanced.

However, we would be concerned if the Open Space designation inhibits projects that could be of overall positive benefit to the community, merely because the arrangement or amount of open space would be affected. Specifically, we expect to see proposals for replacement of the school buildings & grounds. This may present opportunities for the community to consider use of the site for additional uses, for example to include some particular needs housing.

We comment also on the triangle of grass west of the War Memorial, identified as NEW4 on the map of potential development sites and has been rejected for that purpose. The site is owned by Scottish Water and is currently leased to an individual. This site has the potential to be an area of open access in the centre of our community. It is currently bounded by robust hedging. We request that at the first opportunity, the lease of the site be transferred to either Stirling Council or to Strathblanefield Community Development Trust. With the hedge boundary partially removed or significantly lowered and access from either or both Campsie Dene Road and Glasgow Road, the site would be accessible to the whole community.

Conclusion

We trust the above comments are clear and helpful. If the community council can be of further assistance to Stirling in the development of the plan, please do not hesitate to get in touch.

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