

Dunblane Development Trust

## **Response to Stirling Council's draft proposed Local Development Plan**

December 2011

Dunblane Development Trust welcomes the opportunity to comment on the draft proposed Local Development Plan 2011 as the framework for how Dunblane can accept sustainable growth while enhancing the local character and distinctiveness of the city. We appreciate the efforts which have been made to recognise and accommodate previously expressed local concerns both about inappropriate and detrimental development proposals and the need to satisfy existing and future requirements for vibrant and well-linked communities, local services and accessible open space.

We welcome in principle the draft proposals document, and in the subsequent paragraphs of our response we make particular comments which we hope will strengthen specific aspects of the draft plan. In addition, we are confident that individual responses arising from the consultation event held in the Braeport Centre on Friday 18th November will support our view that the local community is fundamentally concerned about integrating existing development successfully into the fabric of the city, improving access to safe, open spaces, seeking a high-quality environment which features good design and the creative use and re-use of existing buildings, and safeguarding the vitality of the well-established High Street as a crucial feature of the city.

### **Green Belt**

We fully support the proposals to extend the green belt to the north and east of Dunblane. The area designated for future housing is too extensive; see comments below on the specifics of the proposed use of this land.

### **Town Centre Boundary**

This proposal will help to protect the use of the current Tesco site and area around the Cathedral which is a major tourist attraction. We therefore support the proposal. We still hold that a Local Spatial Plan should be developed, through community involvement, to consider the future long term development of the town.

### **Conservation area.**

The small change to include the wall on the Glen Road is important. We would urge the Council to take note of the comments in the Appraisal Report and to adopt this report and take note of all comments made. Dunblane's conservation area has been under pressure from inappropriate development for many years, we believe that the adoption of this report will help to prevent further deterioration of this very important aspect of Dunblane.

### **Affordable Housing.**

We welcome the requirement for developments over 10 units to have a 50% affordable housing mix. The problem of the local housing allowance set for the Forth Valley Area has been recognised. The Trust acknowledges that in some circumstances Registered Social Landlord's participating in the New Supply Shared Equity (NSSE) scheme may

struggle to achieve a lower quartile sale price, due to the affordability criteria laid down by Scottish Government. Similarly the calculation for developer contribution, to affordable housing, for developments in Dunblane, based on 25% of the median house price for the housing market area should reflect the Dunblane market area not the wider housing area.

If this policy remains it would encourage the building of small numbers of expensive houses on available plots. The policy would also disbenefit developers in less expensive housing areas within Stirling Council Area. A five house development on farmland in Fallin may have a final turnover of £750,000 with a contribution to affordable housing of 105 x 1¼. A similar development on Dunblane with the same housing types may generate £1.5M yet still attract the same affordable housing contribution - a much smaller proportion of the value of the development, this would appear to be an unfair and unjust policy.

The previous policy of a contribution of a percentage of the cheapest house on a development multiplied by the number of houses in the development was easily subverted by the building of four large, high value, detached houses and sticking a small semi detached unit in the development area. A fairer system would surely be to determine the value of the contribution to affordable houses on a percentage of the total value of the development at sale (an estimate can be made at section 75 with the balance determined when the last house is sold). This would also have the effect of driving down land prices in areas of present high value as some of this contribution would come from land values.

The detail of the contribution could be on a sliding scale where a build that produces houses with a value of £135,000 attracts no contribution (those houses are "affordable") to 30% on developments where individual houses cost £750,000 or more. Exact levels to be set to yield similar or more than the scheme for consultation.

#### **Barbush site (B28 & R08)**

We ask that the results of the recent survey completed by Keith Brown (MSP) be taken into account, in particular the concerns expressed by Dunblane residents on the impact of increased traffic and potential effect on the existing High Street trade. It is clear from this survey that the majority of respondents were in favour of the Barbush site for a supermarket development (61% of total of 775 respondents). It is important that any supermarket development on this site should have conditions imposed to prohibit the presence of any café or other food outlet, a pharmacy and the sales of goods such as TV's. This is to protect the existing businesses in the High Street. Any planning gain aspects associated with this development, or voluntary contributions from the developers, should be directed towards mechanisms designed to support the existing High Street shops and the promotion of the town's cultural and historic assets.

#### **Bogside (HO20)**

We support the inclusion of this site for affordable housing development. Given the setting of this site in relation to Holmehill it is very important that any development is designed to be sympathetic to its environment, that mature trees are retained and that the housing development envelope will not front to Perth Road or be contiguous with the Holmehill boundary wall. We would also ask that the architectural style of the developments which have already been built around Holmehill is maintained and that there is no encroachment on the skyline.

### **Kippendavie (HO21)**

We have concerns about the proposed scale of this site at 100 units in the longer term. It is not a suitable location for significant affordable housing, at 50 units, given its remoteness from the town centre. A more suitable size would be a maximum total of 75 units which could then allow the field to the south of the area to be designated Green Belt. This would also accord with undertakings given by planners at the public meeting at the High School on Expressions of Interest. There are access issues for vehicular traffic using Kippendavie Road, identified at a previous public inquiry, and along Kellie Wynd that will have to be carefully considered. Consideration should be given to the allocation of space for at least 1 small retail unit which could house a community shop. The field to the west of the pond in Kippendavie wood at the south of the HO21 proposal has been wooded, until recently, and is part of a woodland priority enhancement area in regard to the Central Scotland Green Network, as outlined in Stirling Council's Open Space and Green Network proposals that are currently out for consultation. Developing this area for housing would weaken the habitat network links of the town with the woodland areas to the east of the town whereas these links should be enhanced. The recent Ministers announcement in regard to the Beaully Denny power line gives even more support to the concept of "developing the Central Scotland Green Networks initiative in the area". We therefore believe that the area of HO21 should be reduced to remove this "field" and the indicative housing number similarly reduced to 75.

### **Housing in the Countryside**

We feel that the current policy of the Draft Supplementary Guidance 10 - Housing in the Countryside - The Development Plan Policy 14 could still lead to ribbon development - there seems to be no specified time limit on the definitions of farm buildings or ranges or how long a development around a single building will be regarded as an addition and when it would be viewed as a building cluster that could be further increased in size.

### **Sites not considered and Spatial Strategy**

Clearly there are still a number of major concerns on which we would like to further engage with the Dunblane public. These include undertaking a "Planning for Real" exercise in order to generate a spatial strategy or Town Plan. We ask that the Council commit to undertaking such a study as part of the LDP.

Consideration should be given for re-use of the existing abattoir site if the detailed town plan referred to above justifies a change of use. It has been suggested that the town centre could potentially be extended along the west side of the B8033 to include the police station site (which could be relocated). However a thorough consultation with the townsfolk through a Spatial Plan is required to investigate these options that have not come through the present developer lead LDP (insofar as the LDP has evolved from expressions of interest from developers rather than a townsfolk view of how their town should develop).

There are 2 sites on the existing High Street that are in need of refurbishment which would make a significant improvement to the street. These are Nos. 86-88 (Former Chinese restaurant) 79-81 (Dunblane senior citizens charity shop). These sites together with The Stirling Arms were identified as areas of concern in the 2009 Community Plan.

**Open Space, Green Networks and Habitat networks.**

Holmehill and other areas identified as open space should be enhanced by management as open space. Developers should not be allowed to permit any owned site, let alone any that is designated as open space, to deteriorate and become less attractive as open space.

The Laighhills should be designated as a Local Nature Reserve or similar to promote its development and management as an open space.