

FROM: THORNHILL COMMUNITY TRUST,  
2 KIPPEN ROAD,  
THORNHILL,  
FK8 3QA  
16/01/2022

Dear Mr. Mulgrew,

Ref: 21/01017/PPP, Land North West Of And At Burnside Works Main Street Thornhill

Thornhill Community Trust (TCT) has a membership of 92 residents living in Thornhill Village and its surrounding area.

This response is in relation to a proposed mixed-use major development of 73 houses and business units in an agricultural field with the development of a village square/ retail outlets on the site of the current JCC agricultural repair works.

While TCT has no issues with ensuring a vibrant and economically successful future for Thornhill, having considered responses received from our members, **TCT trustees are informing you that we object to this application for the following reasons.**

#### POOR PRE-PLANNING CONSULTATION

The Pre-Application Consultation (PAC) Report 3.3 states 'Meetings were also held in person with the Community Trust'. This assertion is untrue. In November 2019 Inverdunning met with a Thornhill resident in a private capacity who invited along a second Thornhill resident, the latter happened to be a Thornhill Community Trust (TCT) trustee who was there as a private individual. **At no time was this deemed to be a TCT meeting.** There was no approach made to TCT at any time.

Many of the questions asked by the consultants as part of the pre-planning process were leading in nature. As a result, and contrary to the conclusions of the report, the answers to these questions can't be relied on to indicate levels of support for the development within the community.

#### THREAT TO VILLAGE FABRIC AND CULTURE

In the Local Development Plan (LDP) for Stirling, Thornhill is designated a rural village suitable for sustainable expansion which would concentrate small-scale development within settlements and protect the village centre.

Most people move to this area because they value the small village atmosphere, which would be lost if a major development out of keeping with the context or scale of the area is allowed.

The LDP states that it is 'considered appropriate to start with spatial issues and then determine how best to tackle these through appropriate land use and development rather than start with a development target and then aim to find suitable locations to accommodate that level of growth'. The Environment Impact Assessment screening report states '*development*

*of site (ii) would be contrary to the spatial strategy and supporting provisions of the LDP, and submissions in support of the forthcoming application should set out reasons why, in the opinion of the applicant, these should be set aside.'*

The developer's proposal suggests that because Stirling Council has a housing shortfall the construction of 70 + houses in Thornhill would be the answer, regardless of its impact on the area.

An increase to the village population of approximately 25- 30% is disproportionate to the existing population size, which would have a significant negative effect on the established community. The village Main Street is an important historical conservation area due to the preservation of the original layout of the houses and features of many buildings. A new development right next to this would have a layout and density that is inappropriate for the area and would adversely impact its uniqueness and importance. The 2020 Housing Land Audit identifies 3 sites within the village with space for 16 houses, fewer than one quarter of the proposed number. The LDP says the scale of new housing developments should be *appropriate to existing communities, support placemaking and be supported by the necessary infrastructure*. The developers' proposal for an urban style housing development shows that they have utterly failed to understand the character and sense of place of this Carse village. **Therefore, we object to the proposed housing development type, size and density as being totally inappropriate for the area.**

TCT is aligned with a working group (Thornhill Futures) that has been set up to steer the community through issues arising from the pandemic and ultimately to produce a Local Place Plan. We have already had supportive discussions with Stirling Council officers regarding a number of issues, but a large housing development and a village 'hub' on the edge of the village has never been part of our planning. In fact, a potential hub site which is more appropriately situated in the centre of the village has been identified, with ongoing community consultations suggesting several benefits that would not apply to the site proposed by the developers. These include easier and safer access by the majority of village residents and proximity to existing infrastructure (including the Community Hall and village shop). TCT is currently in the process of applying to the Scottish Land Fund to progress acquisition and development of this site.

The developers' document 'Desktop existing service report' (section A) states *"It is anticipated that the development will consist of approximately 500 residential dwellings"*. This is contrary to the proposed 73 houses mentioned elsewhere in the documentation, so we can only assume that the developer has plans to further develop this area which neither Stirling Council nor the local area has been made aware of. We are concerned that this current proposal is the 'thin edge of wedge', with the possibility that future proposals may be looked on more favourably if this one goes ahead.

**In conclusion, this proposal does not 'ensure the scale of new housing development is appropriate to existing communities' and does not 'support placemaking' as required by the LDP and we ask Stirling Council to reject it.**

## RELOCATION OF JCC AND DEVELOPMENT OF BURNSIDE SITE

The Burnside site is earmarked in the LDP for a small development of 5 houses. Instead the developer's proposal is to create a village 'hub,' which would include retail, and renovation of the Tannery Manager's House (on the at-risk register).

As it is within the village Conservation area there should be a detailed planning application as stated in the LDP Policy 7.2 at criteria (b) that: *Given the importance of assessing design matters, applications for Planning Permission in Principle will not normally be considered appropriate for development proposals in Conservation Areas*. However, the outline plans provide very limited information about the number and size of retail units and no information about the Tannery building's future use or who would be responsible for developing it, other than it be *retained for community use along with some new public space*.

We have a number of concerns:

- that if JCC move, the site will be left empty and derelict until the developer has completed the rest of the project which could be 5 or more years;
- similarly for the Tannery house, will this be left derelict, will the community be expected to fund development?;
- that the ground contamination on the JCC site will not be dealt with and there is potential run-off into neighbouring properties and the Boquhapple burn;
- that the proposed village 'hub' is on a corner and across a main road from both the planned new development and most of the existing village, so cannot be considered a suitable central hub or a safe position to encourage extra traffic and footfall.

**Given that part of the proposals are within the Conservation Area, we believe that this part of the application should be refused on those grounds.**

The developers are basing their economic model on the fact that JCC wants to relocate their premises in order to expand their business and 73 houses have to be built in order to fund their expansion on a new site. While the success of a local business is to be celebrated, this is something which JCC should be undertaking for themselves and it should not be at the expense of the community in which it is based. We believe that the developers are attempting to circumnavigate the LDP and Housing in the Countryside guidance by using the excuse of economic development. Their figures in this regard are necessarily speculative, and there is no way of knowing whether and to what extent Thornhill's community will benefit (economically or otherwise) from the development.

While the JCC site measures approx. 0.6ha in size, the proposal is to develop 8.35 ha agricultural land, almost 14x larger than the allocated land identified by the LDP for the sustainable expansion of Thornhill. The proposal is therefore contrary to this allocation and represents inappropriate overdevelopment adjacent to a Conservation Area. **We object to the proposals on the grounds that the scale and rate of expansion proposed are unsustainable and, as set out above, that the development cannot be considered sustainable in terms of economic or environmental benefits.**

## EMPLOYMENT

The developer's own Economic Assessment says that the onus is on Inverdunning (Thornhill) Ltd to provide the relevant information on net economic benefit in support of the planning application. They acknowledge that the considerable costs associated with supporting the expansion and relocation of JCC Group and the formation of new employment and community uses will in part be funded by the requirement of new housing. This argument seems to be implying that the proposed social and economic benefits are more important than the LDP's aim for *the Spatial Strategy to set appropriate scales of development and steer development to the right locations in terms of the environment, the efficient use and management of infrastructure, and in reducing the need to travel*.

The projection for JCC is £10 million turnover and 40 staff (50% being local people) by 2030, however, according to the Economic Assessment in the past year the staff numbers have fallen by 5 so there is no guarantee that JCC will become the major commercial benefit on which the economic rationale for a major housing development is based. The developers' definition of 'local' seems to refer to the Stirling area as few, if any, current JCC employees actually live in or around Thornhill.

The proposed retail area on the Burnside Works site is for one or two units of 1.55 hectares, whereas the LDP has only 0.30 hectares employment site allocation. There is no Retail Impact Assessment to support the claim that 26 full time employees could be supported in one or two units, or what sort of retail of such a size could benefit the local community.

**We do not agree that Inverdunning have demonstrated that the business site development will be of a scale, character, and design commensurate both with the size of the catchment to be served, or with Thornhill village adjacent to where it is located. Therefore we think that the claims about employment creation for the area are unrealistic and ask Stirling Council to request a Retail Impact Analysis.**

## TRAFFIC AND TRANSPORT

The proposal includes plans of 70+ houses and business premises with a possible 160 new full time equivalent employees and 150 new residents. This would involve a huge increase in the number of journeys to/ from home and work in a given day, not to mention customer travel to access the businesses. The Inverdunning 'Transportation Assessment' is woefully inadequate and their solutions equate to providing a leaflet for new residents about bus times and cycle routes.

The proposed 3 extra junctions in a short stretch of road could cause congestion at peak times, especially at school start/ end times when pedestrians will be crossing the road, which could lead to knock-on congestion on the Main Street. During tourist high season the number of vehicles heading for the Trossachs greatly increases and during harvest periods there are frequently large agricultural machines transiting the village and causing more congestion, as well as being damaging to the fabric of the historic buildings on the Main Street.

There are existing traffic calming measures and a 20-mph speed limit on Main Street which are not effective at the moment and there are already many complaints about the amount of traffic using Thornhill Main Street, without adding more junctions and potentially an extra over 100 cars in the village. Residents have reported that cars parked on the Main Street are often hit by passing traffic and it is a regular occurrence for traffic to drive up on the pavement to pass oncoming vehicles. This is a risk to residents and pedestrians on the narrow pavements. In July 2021 the Community Council requested pedestrian crossings on Main Street and near the Primary school but these were refused on the grounds of no suitable place to site them. How will this be overcome by the developers?

The first bus to Stirling leaves the village at 07.39 and the last return bus leaves Stirling at 17.35 (no Sunday service) therefore excluding shift workers from using them.

The nearest full GP services, dentists and pharmacies are in Doune, Callander or Kippen, none of which are accessible by public bus, only by Demand Responsive Transport (DRT). A development of this size will be expected to increase the demand on the DRT and developers should be expected to contribute to DRT costs.

The B roads linking Thornhill to Kippen, Doune, Callander and Aberfoyle are narrow, twisting and busy with cars and farm traffic and Paragraph 4.19 of the developer's 'Transportation Assessment' admits that it is unlikely that any but the more experienced cyclist would be able to cycle to other settlements, thereby increasing reliance on cars or public transport to travel to work or for leisure. The proposed path network only provides new paths within the housing estate and does nothing to improve access to paths to and from the village.

The Supplementary Guidance 'Transport and Access for New Developments' states that developments should aim to reduce travel demands and maximise access by walking, cycling and public transport. **We do not believe that this proposal can achieve this aim, would not provide sustainable transport options and would in fact worsen the situation, therefore, the choice of location for this development should be questioned.**

## CAPACITY AT WASTE TREATMENT WORKS

3.1 of the *Drainage Strategy Report* proposes to drain foul flows from the development into the Scottish Water combined sewer, however, Scottish Water has confirmed lack of capacity in the current Waste Water Treatment Works. [SEPA's policy principles](#) promote the intention of development proposals to connect to the public sewerage system. **Therefore, we would ask the Planners to ensure that growth to the treatment works is a condition of any planning approvals granted to ensure that sustainable practices are adopted.**

## ENVIRONMENTAL IMPACT

A formal screening opinion by Stirling Council found no significant environmental impact on the environment *by virtue of factors such as its nature, size and location; environmental sensitivities of the geographical areas likely to be affected by the development* as a result of the development. The report states that *neither site is within or adjacent areas identified as sensitive*, however, Guy Harewood the Council's Sustainable Development Project Officer has confirmed that the adjacent North Common is a proposed Local Nature Conservation Site which has been missed by the environmental screening.

In 2020 TCT engaged an ecological consultant to carry out a wildlife and habitat survey of the North Common, the results can be found here <https://thornhillstirling.org/thornhill-life/thornhill-biodiversity-group/north-common-survey/>

A major construction project, increased traffic on the adjacent road along with air pollution could have an adverse effect on this sensitive area. Loss of a neighbouring agricultural site could affect wildlife breeding and feeding patterns. Brown hares, curlew and oystercatcher are known to breed in this area.

The developer's 'Preliminary Ecological Assessment' was carried out on a single occasion in August 2021, by which time the nesting attempts of most breeding birds would have finished. The counts therefore cannot be taken as accurately reflecting the impact on the area. **Further assessments must be carried out prior to any disturbance of this area.**

## LOSS OF AGRICULTURAL LAND

The LDP identifies this land as countryside within which Policy 2.10 on Housing in the Countryside and Policy 2.9 Economic Development in the Countryside apply. It also effectively defines the built-up limits of the village of Thornhill. The field targeted for development has been used for crops and sheep grazing within the past year and we consider the loss of a productive agricultural asset in exchange for an enlarged industrial, potentially polluting, business and construction of 73 houses and business units is a bad trade and **we object strongly to the economic rationale provided by the developers which seeks to justify a business agreement involving a major housing and industrial development in exchange for the relocation of an existing business and imposing village amenities, without agreement of the residents.**

## SCHOOL

Thornhill Primary School is a thriving and successful school. The developers claim that it has sufficient capacity for additional pupils, which may be accurate, but our concerns lie with the safety and outdoor facilities for the children. The school playground is inadequate for the current number of children on the roll. The Thornhill Primary School Parent Council have been raising concerns about the playground for 10 years. Accidents and injuries caused by overcrowding are common. An increase in the number of children attending the school would lead to further congestion and reduce the opportunities for meaningful play and pupil creativity. Due to the location of the school there is no possibility of playground expansion.

Currently many children are unable to access the school safely without an adult, due to the volume and speed of traffic and lack of safe crossings. Planning permission for 3 houses right next to the school has already been granted which will further reduce available street parking and there would be additional foot and vehicle traffic generated by this new proposal. As previously mentioned a request for a pedestrian crossing near the school has been refused **and we object on the grounds of safety risks that lack of safe road crossing and lack of safe play areas would cause to our residents' children.**

**In conclusion, Thornhill Community Trust objects to this outline planning application submitted by Inverdunning on the grounds of: ignoring Stirling Council's own Local Development Plan with regard to the threat to our village fibre and culture; contrary to Stirling Council's Housing in the Countryside guidance; contrary to residents' wishes for a central 'hub'; unsustainable road and transport options; lack of credibility of the proposed economic model; safety risks associated with the school; and the environmental impact of this development on a Local Nature Conservation Site.**

Thornhill Community Trust,

Jan 16<sup>th</sup> 2022.