**Instructions:**

1. If you have something new to add do it at the beginning
2. Delete this instructions bit
3. Copy and paste the below into a new word document
4. Sign/put name and address at the bottom of letter
5. Save as PDF and email it to:
	* mulgrewm@stirling.gov.uk
	* planning@stirling.gov.uk
	* tweede@stirling.gov.uk
	* mcdonaldjr@stirling.gov.uk
	* earlm@stirling.gov.uk
	* ThornhillBlairdrummondCC@gmail.com
6. In email subject put: **21/01017/PPP LAND NORTH WEST OF AND AT BURNSIDE WORKS MAIN STREET THORNHILL – Objection - \*and insert your address\***

Written letters to:

FAO Michael Mulgrew (Case Officer)

Planning Department

Stirling Council

Teith House

Kerse Road

Stirling

FK7 7QA

Date: 27 December 2021

**OBJECTION TO APPLICATION NUMBER: 21/01017/PPP |LAND NORTH WEST OF AND AT BURNSIDE WORKS MAIN STREET THORNHILL FOR EMPLOYMENT AND RESIDENTIAL USE INCLUDING AFFORDABLE HOUSING**

Dear Mr Mulgrew,

As a resident of Thornhill, I write to you to formally object to the subject planning application lodged on behalf of Inverdunning (Thornhill) Ltd. Please note that this objection has been copied to my Ward Councillors (Trossachs and Teith), who I trust will note the disquiet the proposals have caused the residents of Thornhill.

In the first instance I would like to note that our village is a small and characterful community, with a cherished rural setting and main street onto which many of our residents’ homes directly face. We are proudly designated a Conservation Area and hold the setting of the village in high regard. The Applicant’s proposals for 70no. houses as well as Employment and Retail uses, will degrade this rural setting, introduce road traffic dangers, and conflict with the Council’s own Policies and Supplementary Guidance on housing in the countryside and protecting the historic environment. **I therefore respectfully ask that the application be refused**.

Please find below some further detail and grounds for objecting to the proposals on planning terms, broken down as follows:

* **Principle LDP Policy**
* **Sustainable Development**
* **Damage to the Conservation Area**
* **Overdevelopment**
* **Access and Traffic**

**Principle LDP Policy**

The relevant plan is the adopted Stirling Local Development Plan (2018). I note that the majority of the application site is identified as open Countryside and has no other policy designation or site-wide Housing or Business allocation. Only a small parcel (0.3ha) is identified for ‘sustainable urban expansion’. The proposals must, therefore, meet the criteria of Policy 2.10 ‘Housing in the Countryside’ to be acceptable in principle. As set out below, I believe that they do not.





One or more of 6no. criteria must be met in order for proposals to be considered acceptable. I would suggest that none of the relevant criteria are met by the subject proposal and note the following responses to the criteria:

* The proposed housing will not be cohesively visually related to existing Building Groups, by virtue of being disconnected from the village and no doubt deploying modern building styles, layouts, and materials (i).
* The application site is not an infill site (ii).
* The proposals are for more than a single dwelling and are not a replacement of a farm steading of similar (iii)(iv)(v).
* The majority of the application site is not brownfield land (vi).

The proposals therefore fail to meet the Councils criteria for appropriate housing development in the countryside, and as such the principle of housing at this site must be refused.

**Sustainable Development**

The Applicant has advanced a housing land supply argument in order to address the above conflict with this key policy; holding that there is a shortfall in the 5-year effective housing land supply for Stirling. I do not know whether this is the case; regardless even if were, I would suggest that the proposals fail to meet the provisions of Scottish Planning Policy’s (SPP) presumption in favour of sustainable development. I would note the following observations in relation to the relevant criteria as detailed under SPP para 29:

* **Good Design**: The detailed design of the proposals is yet to be determined. However, it is more than likely they would utilise modern housing styles, layouts and materials. They would therefore, by their very nature, be out-of-keeping with the Conservation Area, as well as the housing styles, grain and vernacular within the established village.
* **Supporting town centre and regeneration:** The proposals include retail development out-with the centre of Thornhill which would be harmful to the existing local shop. An allocation covering a portion of the site nearest the village stated as ‘Rural Villages Area: Sustainable Expansion’ (B49) does cover this area. However, this allocation is for Housing and Class 4 (business), not Class 1 (shops). As such, retail in this location would be harmful and inappropriate. The proposals are by-and-large on greenfield agricultural land and therefore cannot be considered regeneration.
* **Protecting, enhancing and promoting access to cultural heritage, including the historic environment:** The proposals would negatively impact upon the setting of the Thornhill Conservation Area by impacting views into and out of the village. The likely modern vernacular of the development would similarly detract from the historic environment.
* **Avoiding over-development, protecting the amenity of new and existing development:** The Applicant’s Planning Statement indicates that the residential element of the proposals would be 3.77ha in size. This equates to approx. 19no. dwellings per hectare (dph) likely with small gardens. In contrast, Thornhill village typically has approx. 12no. dph with sizable gardens. The proposals are therefore out of keeping with the grain of Thornhill and represent overdevelopment of the proposal site in residential terms alone. The Applicant proposes to subdivide the wider site into business/industrial, retail and residential uses; which would produce a densely overdeveloped mix of uses on a currently open greenfield site.

The proposals cannot be said to contribute to sustainable development, and this should be held as material consideration against the application.

**Damage to the Conservation Area**

As mentioned, the village of Thornhill is a designated Conservation Area (CA). A Conservation Area Character Appraisal was produced in 2014 and is adopted Supplementary Guidance in support of LDP Policy 7: Historic Environment. The Character Appraisal notes that the CA is characterised by:

*Its setting:*

* *A rural hillside location above the carse lands of the River Forth.*
* *Approach through surrounding agricultural hinterland.*
* *Distant views west to the Highland hills; south over the Forth valley.*
* *The North and South Commons enclose the village and provide significant public open green space*

The first three aspects are under direct threat as a result of the proposals. A dense development along the main road (A873) approaching the village from the west would degrade the rural and agricultural setting as well as interrupt views from numerous locations and residencies within the village. The proposals are also in conflict with the fourth point, as the Applicant seeks provision of new open space within the site boundary. However, there is no deficiency in open space at present and no demand for replacement of rural space with curated areas.

The CA Appraisal further identifies key vulnerabilities to the integrity of the CA, noting that these stem from:

* *Detrimental change and loss of traditional building fabric including original windows and doors, roofscape, chimneys etc.*
* *Pressure for development leading to erosion of green spaces and loss of trees which enclose the village and/or the erosion of the integrity of its surviving original feu plots.*
* *Erosion of the character on the village by inappropriate new development, alteration and extension.*
* *Loss of views and /or development in the surroundings which would affect keys views and the rural setting of Thornhill.*
* *Poor development management/enforcement in the conservation area*

The Applicant’s proposals would be harmful to these vulnerabilities, damaging the integrity of the CA. If allowed, they would result in erosion of important green spaces. They would be inappropriate in location, scale (and likely design). They would result in loss of views and impact key views within the surroundings of the village.

The proposals are therefore in conflict with the Council’s Supplementary Guidance on protection of the historic environment and consequently LDP Policy 7 (specifically 7.2: Development within and outwith Conservation Areas).

Incidentally, it is noted that LDP Policy 7.2 states 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.*

Given that a portion of the Applicant’s proposals are within the Conservation Area, a detailed planning application should be submitted for this element of development; otherwise the full extent of the impact upon the CA cannot be assessed. Given this (and the above) conflict with Policy and Supplementary Guidance, the application should be refused.

**Overdevelopment**

The proposed development will result in detrimental overdevelopment of the proposal site; ultimately resulting in negative impacts upon the amenity and enjoyment of existing residents of Thornhill.

As noted, the proposals appear to encompass LDP site B49 (Burnside Works) which is identified as ‘Rural Villages Area: Sustainable Expansion’. That site measures approx. 0.6ha in size and is identified for housing and Class 4 (business) uses. However, the applicant is proposing the development of an 8.35 ha site encompassing greenfield land. This is an area almost 14x larger than the allocated land deemed to constitute the sustainable expansion of Thornhill. The proposal is therefore contrary to this allocation and represents inappropriate overdevelopment adjacent to a Conservation Area. It cannot be said to be sustainable expansion and as set out above cannot be considered sustainable development. The proposals therefore must be refused.

**Access and Traffic**

The proposals seek to introduce 3no. new priority junctions onto the A873, one of which appears to join the carriageway at a bend in the road. This raises safety concerns for the residents of the village using the A873 in both directions. Similarly, there are safety and amenity concerns over higher traffic volumes moving through the village centre. There are already traffic calming measures in place throughout the village, and often parked cars lining both sides of the street. The introduction of additional traffic travelling in both directions through the village will cause disruption and introduce greater risk and dangers for residents. It is not clear from the Applicant’s submission what vehicle types, timings, and movements they anticipate will be associated with the proposals. However, the principle of introducing greater volumes of residential, business, industry, retail servicing and patron traffic with likely greater numbers of HGVs and associated larger vehicles to this rural setting is inappropriate and must be resisted.

I trust that the above objections to the subject planning application based upon policy and amenity grounds will be taken into consideration, and that the application will be recommended for refusal at any forthcoming Planning Committee.

Sincerely,

Signed…………………………………………………………………………………………………….

Address………………………………………………………………………………………………….

cc.

Councillor Tweed tweede@stirling.gov.uk

Councillor McDonald mcdonaldjr@stirling.gov.uk

Councillor Earl earlm@stirling.gov.uk