

**PROPOSED NINE UNIT RESIDENTIAL DEVELOPMENT
P/21/0046/FUL**

**GLEN ROAD, TORWOOD.
PLANNING OBJECTION**

SUMMARY:

- There is currently building work underway in Torwood for 35 new houses (24 at former Torwood School site and 11 at McLaren Park). This represents an increase of 40% in the number of houses in the village since the beginning of 2020!!!! How many more houses is Falkirk Council going to grant planning permission for in a 'village' that does not have a single play area for kids, has no mains gas, slow broadband service, and a sewerage system that can't cope with the number of additional houses. And this 40% increase in housing has been allowed in an area where the schools have already reached capacity!
- Regarding the specific application the following applies. Falkirk Council adopted the Falkirk Local Development Plan 2 (LDP2) on 07 August 2020 guiding future development in the Council area for the period 2020-2040. The location of the planned development is outwith the village plan for Torwood included in that document (which takes account of Torwood School and McLaren Park sites)
- Environmentally this proposed development would have a seriously negative impact. The proposed site has much replanted woodland and has actively used cycle and walking paths through the area. It would impact the flora and fauna that is already well established in the proposed development area. This line of proposed houses along the hillside would be a huge blot on the existing landscape, removing the beautiful view that walkers, cyclists, and residents enjoy of the existing Torwood woodlands. Removal of the remaining woodland in the area of proposed development is likely to increase the amount of water that makes its way onto and down Glen Road.
- Torwood woods is now a very popular area visited by both walkers and bikers. As you turn into the road leading to the castle you are immediately presented with a beautiful view of the upper woodland. The existing replanted woodland and views to the upper woodland that leads to the historic Tappoch Broch would disappear and be replaced by a row of large houses. This will not be welcome by anybody who enjoys leisure activities in this area.
- Regarding the claims in the planning application, the proposed development is in no way a 'mirror image' of previously approved housing in the village. It would, like all recent development, have no positive impact on vehicular traffic speed on Glen Road, and would actually increase the amount of traffic using the road through the village, making it a less safe and less pleasant environment for existing residents.
- The agent on this planning application was the applicant in 2011 on a separate planning application to build houses in another area of woodland off Glen Road. That planning application, reference P/11/0797/FUL, resulted in an area of woodland being illegally felled.

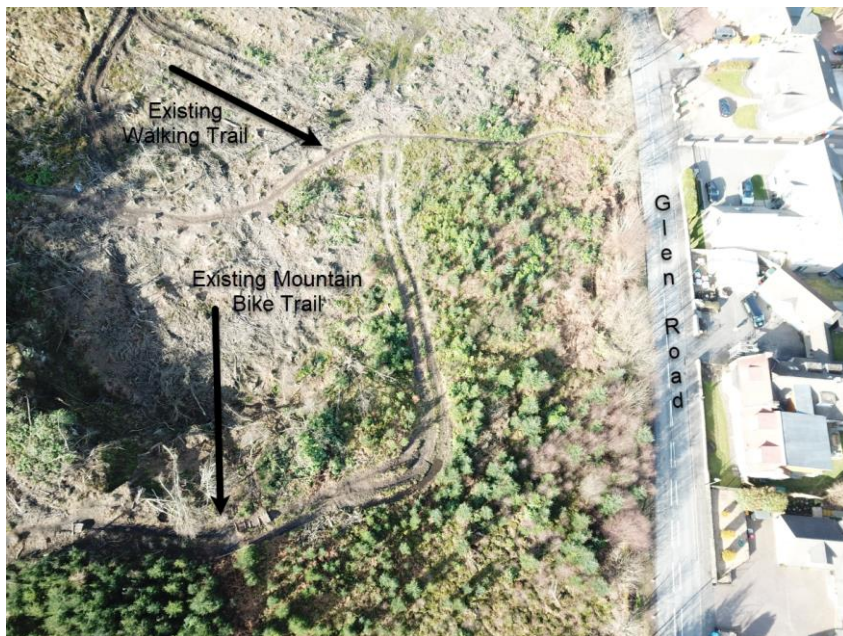
PLANNING STATEMENT

The following includes the full planning statement by the applicant, with additional comments added as [COMMENT:] sections below.

SUMMARY:

The site is mostly formed from cleared woodland and could be considered as rounding-off the village at the north-western end of Glen Road, still all contained within the 30mph speed limit.

[COMMENT: The proposed site is mostly formed from replanted woodland, and part of it is existing woodland. There are already walking paths from the main road up through this proposed housing development area. There are also mountain bike trails and jumps in this area of the woodland which are regularly used]





Existing Mountain Bike path through proposed development area.



Existing Walking path through proposed development area.



Size of existing trees in proposed development area.

There is a need for the green space in this area, and there has been a big increase in the number of walkers and cyclists using the woodland over the last year. There should be no consideration given to reducing the size of this area]

The village has seen incremental growth in relation to its size over the past 20 years and Approval has been Granted to the housing extending along the north-east side of Glen Road to the present 30mph speed zone, which under the terms of the former Policy SC3 would have been categorised as “ribbon development”.

The proposed development is basically providing a “mirror image” of this previously approved housing, [COMMENT:This proposed development is completely different to what exists on the other side of Glen Road. There is not a line of 9 houses on the other side of the road. The houses currently on the right hand side of Glen Road do NOT obstruct views of Torwood Woods. Some of the existing houses are hardly visible from the road and this proposed new development would result in at least 8 of the 9 houses being visible from the road] to be located on the north-west side of Glen Road and would achieve the visual impact that this forms the edge of the built environment, thereby ensuring that the vehicular traffic speed is reduced,

[COMMENT:All previous housing development in Glen Road has NOT resulted in a reduction in traffic speed,]

in order to create a more safe and pleasant environment for the existing residents”

[COMMENT:It will NOT be a safer environment as it would introduce even more cars to Glen Road, which is the last thing the village needs. The current environment of the replanted woodland and beautiful views to the upper woodland would disappear and be replaced by a row of large houses. The only people who would welcome this would be the agent and applicant of this planning application.]

ACCESSIBILITY:

The village presently has a local bus service at the bottom end of Glen Road on the A9, which is accessible to local services and is within a short journey to Larbert Rail Station.

Access to the M876 Glenbervie slip roads is a strategic benefit to the Torwood residents facilitating access to the national road network, thereby reducing the impact of having to connect through the local Larbert road network.

VEHICULAR ACCESS:

The site proposal caters for two common driveway access points onto Glen Road providing the requisite junction visibility splays in both directions. Each property would be provided with in-curtilage parking and turning provision in compliance with DGCS standards with the driveway access crossings piped to accommodate the existing water drainage ditch.

[COMMENT:On the Levels Layout diagram, property #1 shows access from a third access point off Castle Lane (the lane which goes up to Torwood Castle). This road is not suitable for additional traffic]

WATER/DRAINAGE CONSTRAINTS:

Scottish Water are currently in discussion with the applicant, negotiating the acquisition of land within the Blairs Farm at the south-east edge of the Torwood settlement, in order to construct the new replacement Torwood Waste Water Treatment Works, which would be located immediately south of the Bogend Road junction with the A9.

[COMMENT:I hope the council will take no account of the above for this application as it should have NO bearing whatsoever on any decision that the planning department will come to]

Construction work on the project is scheduled for 2021, as the dwellings currently being developed on the former Torwood “special needs” School site, require to be connected into this new treatment plant facility.

[COMMENT:If the construction project at the former school site requires connection to a new treatment plant facility, I would expect that this will already have been agreed with Scottish Water. If the location for that has not already been agreed why was the former school site development given the go ahead?]

Once the new WWTW is constructed and fully operational, there will be no constraint on foul drainage treatment capacity within the settlement.

MAJOR HAZARD CONSTRAINTS:

None.

FLOOD RISK/WATER QUALITY:

A Surface Water Drainage Strategy has been appraised, whereby each dwelling shall capture rainwater on-line into a Rainwater Harvesting Tank, then each plot drainage shall connect into a communal underground storm water treatment/attenuation structure, before discharging into the adjacent existing storm water ditch.

A Hydrobrake shall be installed on the drainage outfall to ensure that the rate of discharge into the ditch is restricted to 3.2l/s/ha in accordance with Falkirk Council’s design criteria.

This provision shall ensure the existing development downstream is at no greater risk of flooding, than from the pre-development land use.

[COMMENT:The removal of the original trees from the area under consideration increased the amount of rainwater that flows down Glen Road. The replanted trees currently in that area will have reduced the excess water now reaching Glen Road. If these trees are removed and foundations put in place for 9 houses, this will definitely result in an increase in the amount of water reaching Glen Road. In general, as commercial felling has taken place in the upper woodland, the amount of water that now reaches Glen Road and the gardens of existing housing in the lower part of the village has increased significantly over the past few years. There is regularly significant flooding at the bottom of Glen Road at the A9 junction.]

SOIL AND GEOLOGY:

The site is not categorised as prime agricultural land.

Rock exists approximately two and a half metres below surface ground level which would facilitate nominal reinforced strip foundations.

No issues exist with any underground mine workings in the vicinity.

EDUCATION CAPACITY:

The site lies within the catchments of Larbert Village PS; St. Bernadette's RC PS; Larbert High and St.Mungo's High Schools.

The proposed site has the potential to generate less children than on the recent residential planning permission Approved on the Torwood "special needs" School site and therefore on this statistical basis, the developer contributions could be substantiated on a similar "pro-rata" basis.

[COMMENT:The proposed site also has the potential to generate more children. The local schools are already at capacity. Any additional house building will result in even more pressure being placed on these educational establishments.]

COMMUNITY INFRASTRUCTURE:

Torwood has no community infrastructure and is reliant primarily upon services located in nearby Larbert, approximately 2.5kms away.

The local Scout Group has their premises located at the south-east of the village adjacent to the A9 and the hall is "hired-out" for numerous social functions by residents from the surrounding community.

Recreational resources can be found at the adjacent Torwood Fishery and Glenbervie Golf Course located on the edge of the village and there is also good access for mountain-biking and walking within the green network and semi-natural woodland surrounding the Torwood Castle.

[COMMENT:This proposed development will reduce the size of this green network, and would result in a reduction of the removal of existing mountain bike tracks and walking tracks]

AIR QUALITY:

No issues.

GREEN BELT:

No issues.

LANDSCAPE:

The topography of the proposed development rises in a north-westerly direction, uphill away from Glen Road towards the adjacent commercial woodland.

This woodland is in the ownership of Callander Estates and forms part of a 25 year woodland management felling programme, which will see the introduction of new native broadleaved replacement planting.

This work is underway with tree felling operations completed in close proximity to the application site, which has dramatically altered the visual landscape setting from the existing households on the opposite side of Glen Road and impacted on the ecology at this setting. [COMMENT: I believe the application site was also part of the original commercial woodland, and a large part of the area shown on the Levels Layout document was replanted more than 5 years ago.]

Albeit, the existing residents that are immediately affected by these changes have welcomed the removal of this overgrown commercial woodland, which has resulted in greater sunlight being afforded throughout the year and the proposed development together with the new broadleaved planting shall create a new backdrop and visual landscape setting. [COMMENT: It would certainly create a new backdrop, but you will find that the existing residents would rather be looking across at woodland than at a row of big houses.]

HISTORIC ENVIRONMENT:

No historic assets are within the site boundaries, however the development lies in close proximity to Torwood Broch and the Roman Road, both Scheduled Ancient Monuments, along with Torwood Castle, a Category A Listed Building.

POLICY HCO5: HOUSING IN THE COUNTRYSIDE

In the introduction statement to this policy it states that the general strategy of the LDP is to direct new housing development in rural areas to the existing villages, in order to sustain their vitality and take advantage of village services and infrastructure.

Additionally within the Policy, it states that development should not constitute ribbon, or backland development (defined as the outward linear growth of development along a road).

To make a direct comparison of residential dwellings that currently exist within the Torwood settlement, from the Ordnance Survey, it is clearly depicted that eight properties exist along the north-eastern side of Glen Road extending outwards to the edge of the village boundary and the start of the 30mph speed limit. Additionally, there are at least three properties that have been constructed in the garden grounds located to the rear of the Glen Road properties.

[COMMENT:There is no relevance to the current application of properties that have been built in the garden grounds of other existing properties in the village]

Due to the fact that the majority of these dwellings have been built within the last 5-20 year period, when the similar policies EQ19; SC3; and SC8 of the Falkirk Council Local Plan were applicable, on this basis I consider it justifiable that if these properties were acceptable under these Policies, then the proposed development should not be rejected as ribbon development, but should be considered as a material benefit to this gateway edge of the settlement, by securing a design proposal of similar scale, density, disposition and design, reflecting the countryside character of the village.

[COMMENT:There is no way this proposed development is a material benefit to this 'gateway edge of the settlement'. It will ruin the view up to the main woodland from both Glen Road and the Castle Lane. It is really only of material benefit to the pockets of the developers. This development proposal is for 9 large 4 bedroom properties. They are not of similar scale or design to the majority of existing properties on the same side of Glen Road.

POLICY HC02: WINDFALL HOUSING

Within this policy document it states that housing development on sites within the urban and village limits, which are not identified as LDP proposals, will be supported where:

- Housing is compatible with neighbouring uses and a satisfactory level of amenity can be achieved. [COMMENT:This proposed development will not improve the quality or character of the area and will certainly not contribute to peoples enjoyment of this area]
- The site enjoys good accessibility by public transport, walking and cycling to shopping, recreation and other community facilities.
- Existing infrastructure, such as transport, drainage, education and healthcare have the capacity to accommodate the proposed development or can be upgraded through appropriate developer contributions.
- The site is not at risk of flooding, or the risk of contributing to flooding elsewhere. [COMMENT:Removing any more woodland will increase the amount of water that makes its way out of the woodland into other areas of the village]

All the above criteria can be satisfactorily achieved, with the scale and density of the development compatible with the neighbouring properties. [COMMENT: The majority of existing properties on the right hand side of Glen Road (the opposite side to this proposed development) sit next to the road. When built, they did NOT block views of beautiful woodland areas and they did not result in removal of regularly used walking and cycle paths.] The existing infrastructure is, or has being improved dramatically [COMMENT:What

has improved dramatically? Still the same sewerage system, still a lack of mains gas, still a lack of fibre broadband] within the village during the past 20 years, since most of the recently approved dwellings have been built, with the new enhancements being:

- Road improvements to the surrounding area [COMMENT:What road improvements are these??] and speed restrictions being imposed on the A9 though the village. [COMMENT:This speed restriction took serious local campaigning and years before the speed limit was reduced to 40mph.]
- A new Water Main Upgrade by Scottish Water
- A new WWTW planned to start in 2021 by Scottish Water.[COMMENT:Planned doesn't mean it will happen!]
- Potential for a Gas Main to be extended into the village as part of the council's redevelopment proposals on the former Torwood "special needs" School. [COMMENT: There has always been that potential, but it has not yet happened]

POLICY HC04: HOUSING DENSITY AND SITE CAPACITY

Within this policy document it states that the density and overall capacity of housing should be determined by a site planning process, based on placemaking principles, in particular prior consideration of:

- The context of the site and the character of the surrounding area.
- Residential amenity, giving particular regard to privacy, daylighting and suitable provision of garden ground.
- Landscape Impact and associated mitigation.
- Open space, flooding & surface water management and other green infrastructure requirements.

The location, design and density of the proposed development reflects the character of the existing dwellings opposite, at this gateway edge of Glen Road into the settlement.

All the proposed properties are to be provided with substantial private rear garden ground, with an additional woodland planting buffer separating the dwellings from the existing woodland, enhancing the landscape, ecology and bio-diversity at this location. [COMMENT:Removing the existing flora in the proposed development area will REDUCE the bio-diversity and have a negative impact on the ecology. The development will NOT enhance the existing landscape in any way and will be detrimental to existing wildlife]

CONCLUSION:

The character of Glen Road and the proposed development is more akin to frontage development contained within the built form rather than the 1960's classification of ribbon development, which planning policy now seeks to restrict where development extends settlements along main road frontages. [COMMENT: The proposed development would be ribbon development]

The situation here is that on the opposite side of the road, a similar incremental development design has previously been Approved by Falkirk Council with the majority of these dwellings being constructed during the last 20 years. [COMMENT: This should have no bearing on this proposed development]

The proposed development would be sympathetic to the existing form/character of the village and would not have a detrimental impact on the landscape setting. [COMMENT: This development has no connection with the existing character of the village]

By developing virtually a mirror image of the residential development on the opposite side of Glen Road, this creates a gateway edge into the settlement and in the past, it has been stated by the council's former roads officials, that double-sided development is a major psychological contributing factor in the reduction of traffic speed and thereby results in improved road safety. [COMMENT: The above is simply NOT true. There is two sided development much of the way up from the bottom of Glen Road to the turning up to Torwood Castle, which is at the edge of the proposed development. Whatever may have been stated by council officials, this has NOT helped reduce the traffic speed down Glen Road, which has been suffered speeding motorists for years. Ask any of the residents living on Glen Road]

The development of the land does not impose any impediment to construction in terms of geology, drainage, services, forestry, landscape, or social infrastructure and therefore should be reviewed in direct comparison to the Planning Permissions that have been Granted in Torwood during the past 20 years. [COMMENT: This application is in no way similar to the majority of planning permissions that have been granted over the past 20 years]

A recommendation to Approve would complete this remaining unbuilt section of two-sided development along the entire length of Glen Road, up to the settlement edge, all within the current 30mph speed zone and would finally define a uniform village envelope within the Local Development Plan. [COMMENT: There are other unbuilt areas on Glen Road, so this proposed development would NOT complete the remaining unbuilt section. This proposed development is not within the local development plan (LDP2), which was only adopted by Falkirk Council on 7 August 2020. Provision in this was for 15 houses at the former Torwood School site (which is apparently now a 24 house development) and 10 houses at the McLaren Park site (which is apparently now an 11 house development). With these 33 additional houses currently being constructed, there is absolutely no requirement for any further housing to be built in the village for years to come]

Rural North - Settlement Statement

5.48 Rural North includes the six villages of Airth, Dunmore, Letham, Skinflats, South Alloa and Torwood and the collective population of these villages is 2870 (2016 estimate). It comprises the countryside areas to the north of the Forth and Clyde Canal, a varied landscape of flat carseland, lowland hills and hill fringes, and the internationally important estuarine wildlife habitats along the Firth of Forth.

5.49 New homes will be provided in Airth and Torwood. At Airth the most significant housing allocation is at Castle View, a large greenfield extension on the escarpment above the village which will provide 132 homes. Two smaller sites are allocated at Airth Castle for 15 new homes and The Glebe at the northern entrance to the village for 30 new homes. In Torwood, two small sites will be developed at the former Torwood School at the entrance to the village for 15 new homes, and McLaren Park in the centre of the village for 10 new homes. Capacity enhancements by Scottish Water are planned to Torwood Waste Water Treatment Works. No new housing is planned for Dunmore, Letham, Skinflats and South Alloa.

5.50 The area around Airth and Letham contains deposits of several minerals of economic importance, particularly shallow coal resources and coal bed methane. The Council will maintain its policy presumption against open cast coal extraction in this sensitive landscape area. In terms of coal bed methane, the Scottish Government has issued