



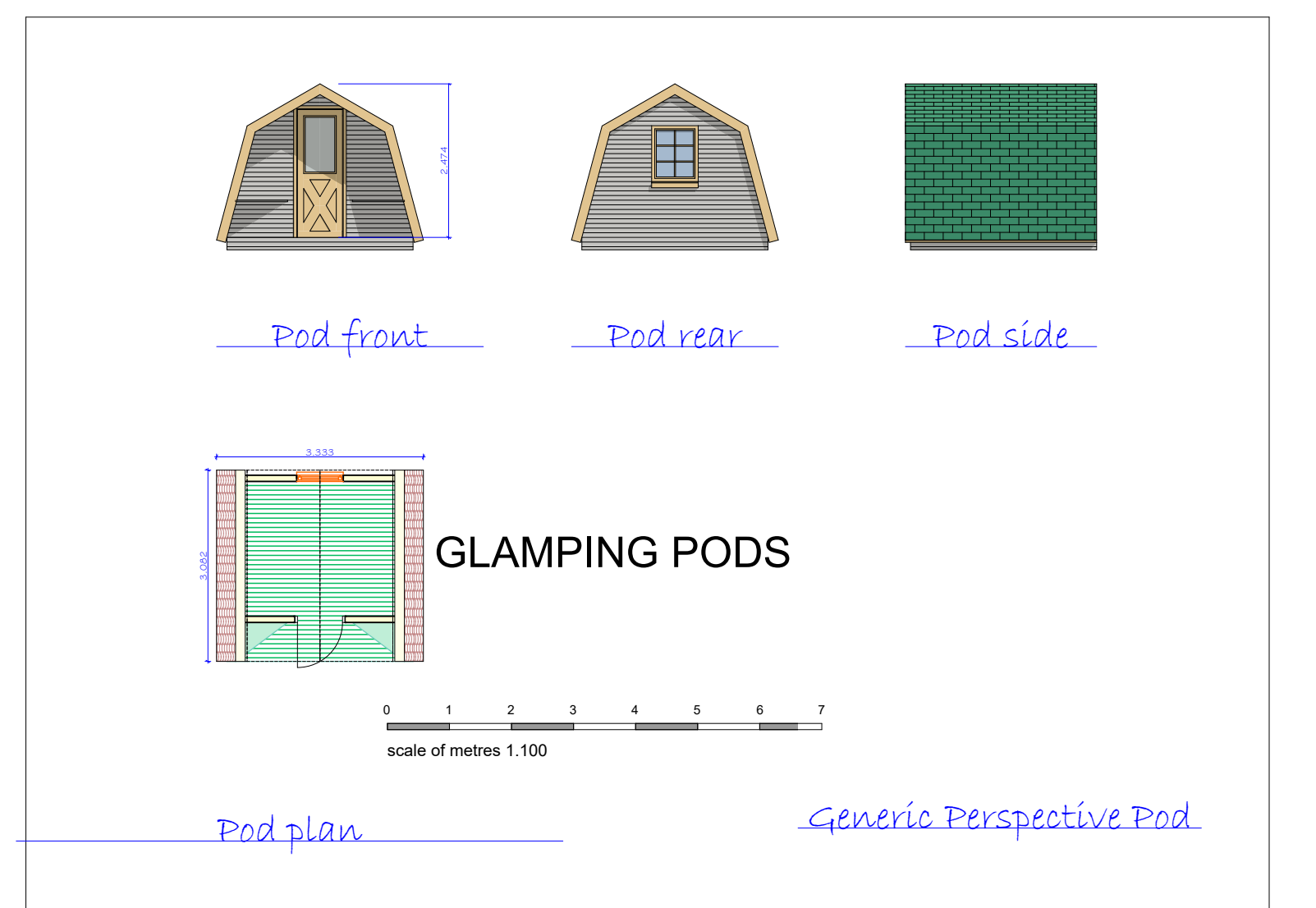
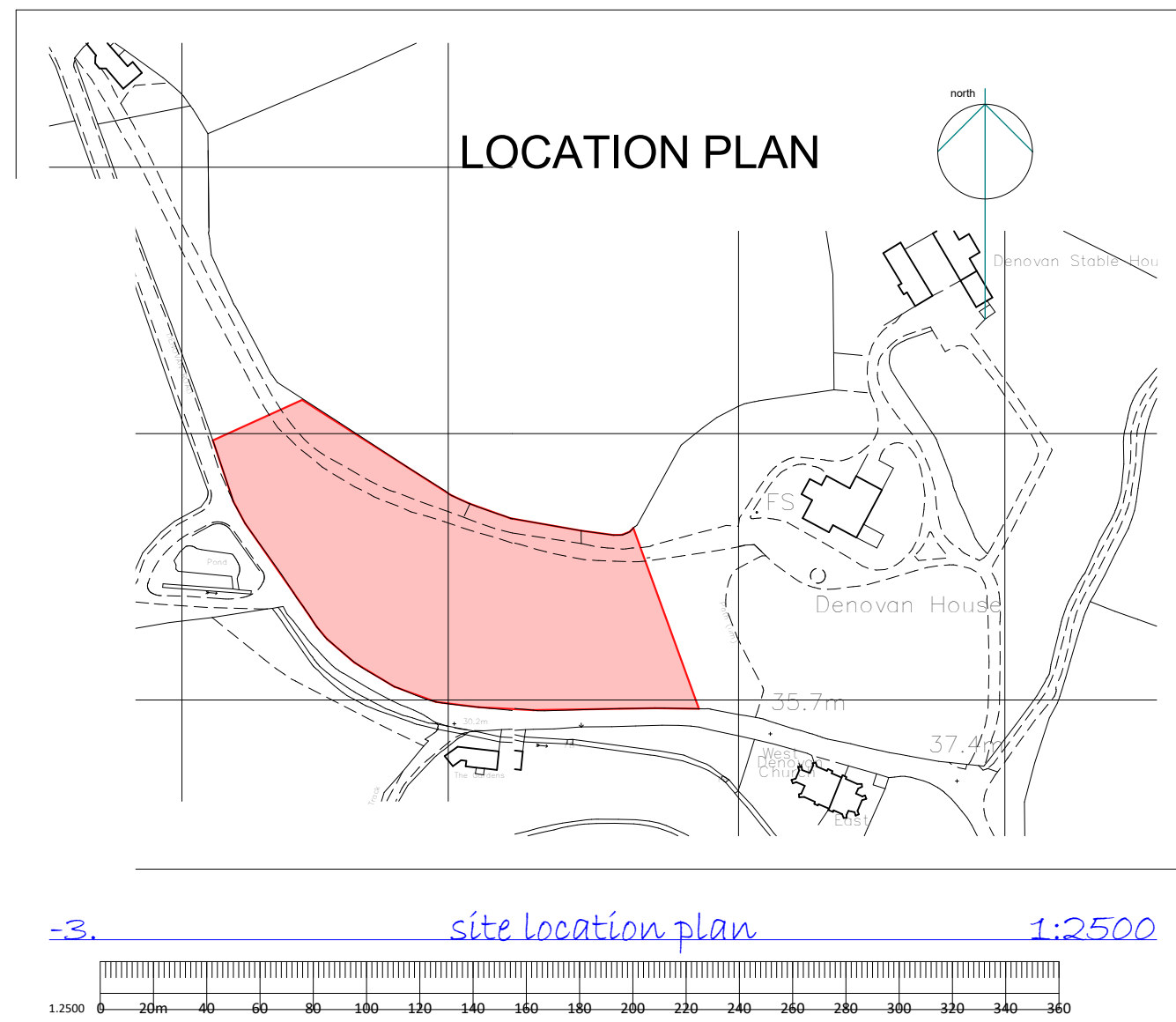
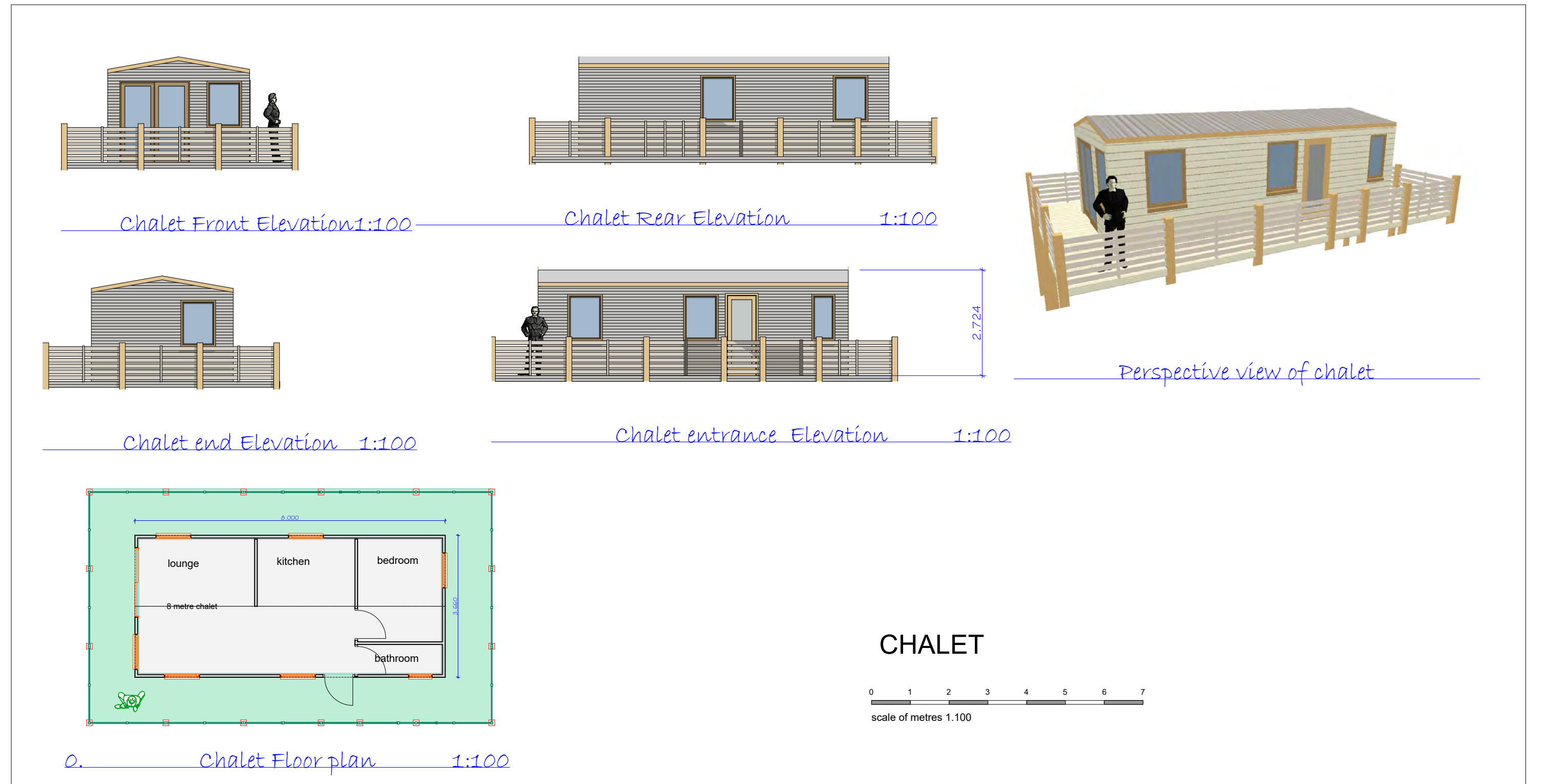
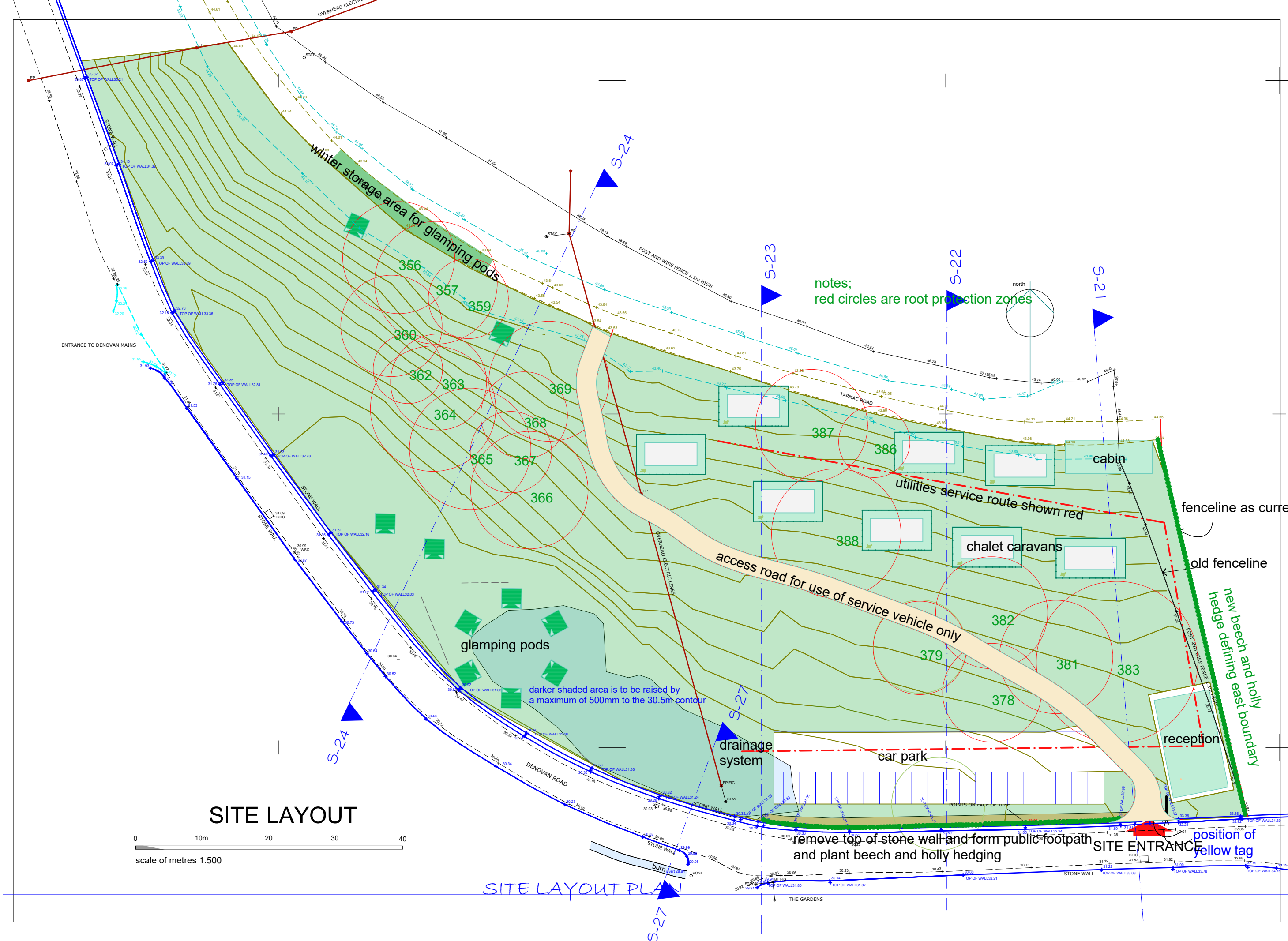
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Project PROPOSED HOLIDAY PARK AT DENOVAN VILLAGE DUNIPACE		
Title All layouts		
Drawn By. CC	Sheet Size. A1	
McFARLANE CURRAN BUILDING DESIGN 12 MAIN STREET, COMRIE, DUNFERMLINE KY12 9HD TEL 07932322360 email: colm@mcfarlanecurrans.co.uk		
Date. 05/12/2016	Scale. various	Drawing No. 4953.d.06p

DENOVAN VILLAGE RULES AND COURTESIES

These rules apply at all times to guests staying at Denovan Village

The person booking for a group must ensure all guests in their group have read and accept the Terms and Conditions. It is essential to the operation of the Village that our facilities, other guests, and our neighbours are treated with respect at all times and any justifiable complaints will result in a client's expulsion (without refund) from the facility.

Security

Denovan Village is a 24 hour managed site. Security personnel are available onsite in an emergency. We have continuously recording CCTV with night vision. Site lighting, predominantly low level low wattage lighting, is designed to provide safe illumination of the access paths but not to intrude on our neighbours. The onsite security can be contacted between 11 pm and 7 am. Drinking water is available from the facility at the north side of the main building 24 hrs a day.

Main Building / Club House

The Club House will be closed between 10 pm and 8am (and potentially at other times depending on required seasonal variations).

During this time when the main building/communal area is unavailable there are toilets and showers accessible from outside.

Countryside

We ask you to adhere to the Countryside Code. When walking the local footpath routes please ensure all gates are closed behind you at all times.

Be aware this is farm land and all dogs must be kept on a lead at all times to protect lambs and cattle.

Smoking

Smoking is not permitted in any of our Log cabins / or Glamping pods and in the club house or any shared inside areas. You may of course smoke on your own private balcony or any area that does not interfere with other guests enjoyment.

Dogs

Well behaved dogs are allowed on our site but owners must be responsible for them at all times. Animals are not allowed inside the Reception / Club House and amenity blocks. Any damage caused by your dog will be chargeable. Dogs should be kept on a leash around the campsite and a maximum of one dog per cabin or pod is permitted.

Not all accommodations are available for dogs. It is mandatory that owners must remove and dispose of their dog's litter.

Showers are for our human guests and we will not tolerate abuse of the facility should owners attempt to wash their dogs in the Glamping shower facility. A separate area has been set aside where your pet can be cleaned.

Children

NO under 18s are permitted to stay on site unless accompanied and supervised by an appropriate parental aged adult at all times.

If a booking is made and staff become aware they are under age we will ask them to leave with no refund. There are no exceptions to this rule.

Children should be supervised at all times and parents/guardians/supervisors are responsible for the children in their care. This applies to the whole site and includes the children's play area and nature walk. Children must not be allowed to run around cars, private accommodation and the clubhouse. This site is for the enjoyment of all and well behaved children are welcome.

Cyclists

A cycle stand is located adjacent to your camping pod and cycles can be secured here with an appropriate bicycle lock. Cycle locks can be hired from Reception if required.

Damages

Any damages or breakages or extra cleaning charges attributable to a guest(s) will be chargeable. Likewise if anything is missing. We reserve the right to charge to the credit/debit card (details given on booking) an additional fee should anything be left in an unsatisfactory condition or if there is any damage to our property.

On check in we will require a preauthorised payment from your card of £100 per pod/cabin which is kept in a holding account should we need to take it for damages.

We only accept credit cards for the preauthorised deposit payment. Please note we only actually take a payment if there is damage and to the value of the damage caused. The preauthorisation money is kept in a holding account by our Bank and released back into your account after housekeeping has cleaned and inspected your pod and no damage done or excessive cleaning needed. We ask you to respect the effort we have put in to making our site one of the best in Scotland and the UK and to treat it accordingly.

Housekeeping

Whilst we clean and maintain our site; guests are expected to leave camping pods and cabins in a neat and tidy fashion. No rubbish is to be left in the camping pods cabins or service building. No unused food should be left in the fridges. Outdoor footwear must be kept clean before entering any of the indoor areas including your accommodation. We have outdoor sinks beside the lodge for this purpose.

We are a recycling site and would request that you sort and deposit recyclable items in the appropriate bins for collection.

Noise and Alcohol Consumption

Please be considerate of other guests and we ask you keep the noise to a minimum at all times, particularly after 10pm. Whilst we allow the bringing on and moderate consumption of alcohol we prefer you to do this to your own pod and campfire area. After 11PM alcohol should only be consumed within your accommodation area. Under no circumstances should alcohol be left unattended by adults in any area of the site.

Loud or offensive noise will NOT be tolerated. We reserve the right to remove any intolerant guests from our site day or night, not adhering to our rules, with NO refund. NO drugs to be brought on site or taken except for medical reasons and should not be left unattended. Should any illegal drugs be detected by our staff Police Scotland will be informed immediately and any users will be removed from the site without refund.

This is a family site and some of our guests may be disabled. We will not tolerate any abuse in any form from any guest and request that respect is shown and will be expected from all.

Arrival/Departures:

Arrival/Check In is from 2pm to 5pm (Mon to Sat) and Sundays from 2pm to 4pm.

Departure/Check Out is at 10am prompt on the day of departure. If checking out early please advise us of this. There is a late Check Out option (subject to availability) of £20 per cabin / pod which allows you to leave up to 1pm. Late check out (if available) must be paid for at reception and we must be made aware of your late check out prior to reception closing the day before the late check out.

Disposable BBQs

Disposable BBQs are only permitted on site when used safely in designated areas. Disposable BBQ's are dangerous in confined areas and can produce deadly fumes. Under no circumstances are they to be brought into pods, cabins the service building or any enclosed space. They must not be disposed of in waste bins but in the designated disposal point beside reception. We reserve the right to charge to the credit/debit card details given on booking for failure to adhere to this and cause damage to the property or the surrounding grass / tree areas.

Fire Pits

Our pods have a bbq area close by and we would recommend using this for both safety and being courteous to other glampers. Guests must ensure that fires and bbqs are fully out before retiring to their pods. Do not leave your fire unattended. Put the fire to bed before yourself.

Fires

Fire points are located around the site. Please familiarise yourself with the nearest point. Camp fires are not permitted other than in the fire pits provided. All firewood for camp fires **must** be purchased on site. Any breach of these rules will result in a charge for fire pits. Therefore scavenging for wood anywhere on the site is not allowed and wood cutting equipment is strictly prohibited.

Parking

This is a Private Site. Parking is restricted to one space close to your cabin where this is provided. Car Parking for Cabins and pods is in the designated spaces in the reception car park and there is parking adjacent to the Main Building for Motorcycles. Day guests and visitors not staying on site must notify management of their presence and obtain a daily parking disc. Parking is free for guests to the Village. All unauthorised parking will be charged at the prevailing rate.

N.B.

We reserve the right to refuse service to anyone. Flagrant disregard of site rules shall be reason for removal from the site without refund. We regret we cannot be responsible for loss or damage to personal property. The children's nature trail has been designed with the help of the Falkirk Ranger service and we request that adults do not smoke on this trail when it is being used by children.

Payment

Payment is required in full at time of booking. We do not accept provisional bookings so please do not make a booking unless you are in a position to honour it. We do not accept cash bookings. Please contact us with any queries or if you prefer to make a telephone booking rather than by email.

Cancellation or No-Show

In the event of cancellation or no-show we do not offer any (full or partial) refund. However, if more than 3 days notice is given, we may at our discretion offer an alternative date suitable to you only if we have the availability to do so.

Travel Insurance

We strongly advise you to take out the appropriate levels of travel insurance so you can have peace of mind that your costs will be covered should you need to cancel your holiday for any reason. There is a link on our website where you may qualify for insurance.

Complaints Procedure

We take all comments from our guests seriously and in the unlikely event that you wish to make a complaint you can contact us by telephone or email and we will respond. We will try to resolve any issues as soon as possible.

In the event that we receive a justified complaint from our neighbours related to the activity of any guests, once identified the guest concerned and their party will be required to leave the site immediately. **No refunds will be given**

From: [Geoff Swift](#)
To: [Sobieraj, Antonia](#); [henderson, iain](#)
Subject: Planning Application P/15/0022/FUL
Date: 11 November 2016 14:56:01

Dear Antonia

Thank you for a copy of the letter sent to Sandy Smith on the 3rd November for my attention.

I wish to continue my objection to the above application including my previous objections. My continued objections are based on the following;

The planning committee has a duty to uphold, apply and protect Falkirk District Council's policies and procedures. To listen to and take the advice of the Council's expert full time officials.

At the first planning committee meeting the full time officials made it very clear that the application did not meet the Council's planning requirements and it was refused.

Since then the applicant has appealed and the committee ignored the advice and guidance from the full time officials. The committee asked for additional information from the applicant which was supplied. However, in my view the additional information is irrelevant. The basis of the planning refusal is the same, it does not comply with the Council's planning policies and procedures.

This is a proposed commercial development in a bluebell wood within a greenbelt area. Without doubt, as a layperson looking at this application, I can see no reason or justification why the planning committee would grant planning permission. This would be against the Council's Policies and Procedures and leave the Council and the committee open to external investigation.

Yours sincerely

Geoffrey Swift
West Lodge
Denovan
Denny
FK6 6BJ

From: [Colin Brodie](#)
 To: [Sobieraj, Antonia](#)
 Subject: Planning Application P/15/0022/FUL - Proposed holiday park, Denovan Road
 Date: 16 November 2016 21:17:06

Dear Ms. Sobieraj

I have examined the further submissions from the applicant for the above and would make the following comments, primarily on the road and transport issues and the drainage.

ROADS AND TRANSPORT

My original objection to this application centred on the unsuitability of the road for additional vehicle and pedestrian traffic and the latest submission does nothing to convince me that this view has changed and my comments are as follows:-

1. Photos 2.3 & 2.4 show the narrow width of the road and the cars in the photo brushing the vegetation on both sides to pass each other in a head-on situation.
2. Photo 2.5 shows the site access position but does not give a true perspective of the slope, which is uphill from the camera position.
3. Photo 2.6 is not the access to Denovan House. The access is opposite the church beyond (towards Falkirk) the proposed site access.
4. Photo 2.7 states that it is east of the proposed site but is actually west of the site. Access to the site will be approximately 30m round the bend at the foot of the hill.
5. The information on crash data is for **reported** accidents up to 2015 and takes no account of the numerous minor bumps and wing mirror removals which occur regularly and no mention is made of the car which overturned taking avoiding action of another car in the summer of 2016. Police were present at this incident and will be able to verify this.
6. The submission states that the road will cause no concern to the Road Safety Officers of Falkirk Council but any road this narrow should cause concern.
7. The statistics quoted re speed do not take into account the fact that the straight downhill section of Denovan Road to the west of the proposed access is the fastest section of Denovan Road. The mean speeds quoted are governed by tight and blind bends where the speed has to drop to 10-15mph for safety. Traffic may be light at the access point but the speed is not low, typically well in excess of 30mph. It should also be borne in mind that the vast majority of people using this road do so on a daily basis and are used to the road and bends and to where the fastest sections of road are.
8. As correctly stated in the report there is no footpath at the point of the proposed site and, in fact, it terminates about half a mile away at the site of the former primary school. It is also correct to state that there is pedestrian access to Denny opposite the site entrance and that buses to Falkirk, Stirling and beyond can be caught in Denny. However the most direct route to access the bus routes to and from Stirling and Glasgow is by walking along Denovan Road in a westerly direction to the bus stops on the Stirling road which will entail negotiating several blind bends

without the benefit of a footpath or street lighting.

9. The report also states that signs indicating horses mean that the road will be safe for pedestrians. Very few horses are exercised and cyclists tend to go quicker than horses and offer a much smaller visual contact.
10. The proposed site access may be on a straight section of road but it is on a sloping road section between two very bad bends.
11. Fig 3.3 of the M&A report contains an artists impression of the proposed site which fails to give a true indication of the site slope and the fact that the cabins and pods, being uphill of the road, will be clearly visible and a possible distraction to passing traffic.

DRAINAGE

1. I disagree with the calculation of the hydraulic flow used to calculate the septic tank and soakaway sizes. Assuming that the figures used are from the SEPA code of practice attached to the submission it would appear that the chalets are calculated at a rate of 150 litres per person as for a domestic dwelling and the pods at 100 litres per person as per a non-serviced caravan site. As there is a figure given in the code of practice of 227 litres per person for a holiday chalet resident it would seem more appropriate to use that figure which increases the total flow for the chalets alone from 6000 litres to 9080, an increase of 50%. I do not know if the figure of 100 litres per person per day for the pod residents is sufficient but given that they will have access to toilet and shower facilities in the clubhouse a higher rate should possible be applied. if the allowance is increased to 150 litres per person this again gives a rise of 50%, increasing the total flow, before the factoring is taken into account, from 8000 to 12,080 litres.
2. Given this increase in flow I would suggest that the treatment method should be a packaged treatment system rather than a septic tank and I would surmise that the septic tank option has been proposed on grounds of initial and running costs. I would assume that a packaged treatment plant would be the preferred option for the Council as they replaced an existing septic tank serving the 4 semi-detached houses opposite the former primary school, with a maximum of 16 residents, with a treatment plant rather than a septic tank which would have served that number perfectly well if correctly sized.
3. The use of a treatment plant would also result in cleaner effluent flowing to the soakaway which, although on the opposite side of Denovan Road, is only about 10m and uphill from a stream which runs into the River Carron.
4. I note the reference to a SUDS drainage system for the site but drainage must also be put in place to prevent runoff onto the road from the site access and parking areas as the section of Denovan Road at the bottom of the hill before the proposed access is prone to flooding at the present time.

In conclusion I also have to disagree with the findings of the bat survey which states that less than 2 bats were noted foraging in the area. Numbers far in excess of that can be seen any evening, spring to autumn, whilst walking or driving past the proposed site.

I trust that I have conveyed my comments and objections clearly and once again state my objection, due to the above, to the proposed development

Yours faithfully

Colin Brodie FRICS
The Schoolhouse
Denovan Road,
Dunipace
FK6 6BH

West Denovan Church, Denovan Road, Denny, FK6 6BJ

16 November 2016

Antonia Sobieraj

Committee Services Officer

Falkirk Council

Dear Ms Sobieraj

P/15/0022/FUL Holiday Park Application, Denovan Road, Denny

I refer to your letter dated 3 November 2016 in relation to further written submissions received in relation to this application. I also refer to my previous objections dated 30 March 2015 and 25 April 2016. Despite this further information submitted I still wish to object to this development. The additional information does not remove the fact this development is against policy (including the technical advice of the officers), will damage a historic bluebell wood and listed building setting and will cause local residential impact. This is set against no substantial business or economic case for the development.

In relation to the points in the letter:

1. While a transport study has been provided it fails to recognise the speed that many “rat-running” vehicles travel on this 60mph road. Photo 2.5 in the report clearly demonstrates the limited visibility for the proposed entrance. The report does not address technical concerns of the Council’s own highway engineers and councillors should not approve a development which is contrary to road safety.
2. No landscape capacity assessment has been provided. If this information is not available and given the importance of the landscape impact and views the proposal should be refused. The applicant has had numerous opportunities to provide this information but has not.
3. The “Village Rules” do not address this point fully and only highlight concerns over the development, ie “After 11pm alcohol should only be consumed within your accommodation”. Open alcohol consumption in a residential area is not acceptable and I would like to respectfully remind the committee that this is a family residential area not an isolated site.
4. No details of the internal road network have been provided and as point 2 this is a major issue in terms of the site layout and impact given the gradients involved. As above there have been opportunities for the developer to provide this and this has not happened so the development should be refused.

5. The Committee should ensure they have taken advice from Council Building Standards and SEPA. The site could have in excess of 80 people if all accommodation full so the current drainage plans are inadequate.
6. Only a diagram is provided which does not take cognisance of the internal road network construction as no details of that are provided. The developer has removed many trees while this application has been progressing without waiting for the outcome of the decision.
7. While the mitigation measures are noted this development will destroy an ancient habitat, particularly in relation to the magnificent annual bluebell display which be largely destroyed by the car park and internal roads, all for a development which has no clear business case and is against democratically developed local planning policy.

In summary, I urge this committee to reject this appeal on planning policy grounds, technical grounds, impact on residential amenity and on the grounds the applicant has not provided the information required by the committee.

Yours sincerely

Roddy Macdonald

Ms. A. Sobieraj
Fulford Council
Corporate Services
Municipal Buildings
Fulford, FK1 5RS.

H1 Ingleston Avenue,
Dunipree,
Denny
FK6 6QW
16/11/2016

Dear Madam
Planning Application - P/15/0022/FUL

I refer to your letter of 3rd Nov. 2016, requesting any additional comments with regard to my original submission of 1st April, 2015.

While I remain totally opposed to the principle of development in this location on the environmental and economic grounds, which I highlighted in my initial letter, I am now even more convinced in light of the existing and potential increase in traffic on the local road network.

As a regular driver and walker along Denovan Road, I am genuinely concerned at the speed and numbers of vehicles, currently using the Road, many of which appear to be commercial in nature, intent on avoiding Denny Cross. A new commercial development, such as the one under consideration, can only aggravate this situation around the proposed development site and along the whole of Denovan Road.

Denovan Road is a popular walking route, as part of the local path network and I frequently have to stand up on an unstable verge, as vehicles speed by or manoeuvre to pass one another.

I had also understood that the structure currently on site did not have the necessary approvals and was therefore going to be subject to enforcement.

Yours faithfully,



West Denovan Church
Denovan Road
Denny
FK6 6BJ

Antonia Sobieraj
Committee Services Officer
Falkirk Council

17 November 2016

Dear Ms Sobieraj

PLANNING APPLICATION P/15/0022/FUL DEVELOPMENT OF LAND TO FORM HOLIDAY PARK AND CAMPING PODS, AND RECEPTION BUILDING, DENOVAN ROAD, DENNY

I refer to your letter dated 3 November 2016 in relation to further written submissions received in relation to this application. I also refer to my previous objections dated 6 Oct 2015 and 25 April 2016. Despite this further information submitted **I still wish to object to this development**. The additional information does not remove the fact this development is against Falkirk Council Planning Policy (including the technical advice of the officers), will damage a historic bluebell wood and listed building setting and will cause local residential impact. It goes against planning policy and on this ground, should not be permitted. This is set against no substantial business or economic case for the development and any previous economic case used has been largely eroded by the amelioration efforts that are required.

In relation to the points in the letter:

1. While a transport study has been provided it fails to recognise the speed that many “rat-running” vehicles travel on this 60mph road. Photo 2.5 in the report clearly demonstrates the limited visibility for the proposed entrance. The report does not address technical concerns of the Council’s own highway engineers and councillors should not approve a development which is contrary to road safety.
2. The transport study was carried out over 5 days in August, including Sat and Sun (low load periods). The problem with traffic on the road is particularly bad during the *week* as this services traffic coming off the motorway and is a rat run. The ‘beware of horse’ signs were erected by Falkirk Council in 2013 due to lobbying by residents on Denovan Road to Falkirk Council and as a **direct consequence of the dangerous traffic conditions on the road**. While the applicants’ report noted there had been few accidents on Denovan Road, this does not reflect the true picture on rural roads. Denovan Road is currently classed as a grade C rural road and as such is governed by the national speed limit of 60mph. As you may be aware, the national picture for deaths on rural roads paint a shocking picture. For example:
 - there are double the number of car driver / passenger deaths on rural roads compared with urban roads (RoSPA, 2012);
 - 80% of fatalities with pedestrians occur on rural roads;
 - double the number of motorcyclists deaths occur on rural roads, compared with urban roads;
 - cyclists are more likely to be killed or seriously injured on rural roads than urban roads and when accidents involve kids, these are more likely to be fatal.
 - Although there are no numbers for horse riding accidents on rural roads, the British Horse Society estimate 3000 accidents per year, and many of these involve children.

3. No landscape capacity assessment has been provided. If this information is not available and given the importance of the landscape impact and on views (especially with the reinstatement of the Dale Bridge) across the river Carron to Denovan Church and Denovan House - the proposal should be refused. The applicant has had numerous opportunities to provide this information but has not done so.
4. The "Village Rules" do not address this point fully and only highlight concerns over the development, ie "After 11pm alcohol should only be consumed within your accommodation". Open alcohol consumption in a residential area is not acceptable and I would like to respectfully remind the committee that this is a family residential area not an isolated site. Councillors of Falkirk Council should not encourage this in any form.
5. No details of the internal road network have been provided and this is a major issue in terms of the site layout and impact given the gradients involved. As above there have been opportunities for the developer to provide this and he has consistently failed to do so. This indicates that the applicant is aware that this information is not adequate to pass the scrutiny of the committee and therefore the development should be refused.
6. The Committee should ensure they have taken advice from Council Building Standards and SEPA. The site could have in excess of 80 people if all accommodation is full so the current drainage plans are inadequate. The tanking size and soakaway are inadequate ie *"they should be based on 100% of every application and load is quantified. DO NOT reduce values based on reduced expectation"* Code of Practice Flows and Loads, British Water, SEPA et al
7. Internal Road Network - Only a diagram is provided which does not take cognisance of the internal road network construction as no details of that are provided. The developer has removed many trees while this application has been progressing without waiting for the outcome of the decision.
8. While the mitigation measures are noted this development will destroy an ancient habitat, particularly in relation to the magnificent annual bluebell display which be largely destroyed by the car park and internal roads, all for a development which has no clear business case and is against democratically developed local planning policy.
9. At the Planning Review Meeting, Councillor Turner made the valid point that the cumulative changes being made by the applicant to address the concerns of the Committee were so great that the business plan was likely in need of revisiting to reflect the changes made. Despite this, the applicant has not included this and it is unlikely that the business case that was originally made is still relevant to this application. The granting of this development on economic and tourism impact grounds is therefore questionable.

In summary, the committee should **reject this appeal** on planning policy grounds, technical grounds, impact on residential amenity and on the grounds the applicant has failed to provide the basic information requested by the committee.

Yours sincerely

Donna Heaney

From: [Neville Makan](#)
 To: [Sobieraj, Antonia](#)
 Subject: Denovan House - P/15/0022/FUL
 Date: 07 November 2016 13:58:04

Dear Antonia

Thank you for consulting Scottish Natural Heritage in relation to the holiday park development proposed at land to the south west of Denovan House, Denny, Falkirk (P/15/0022/FUL, dated 3 November 2016).

You ask for our comment on the *Bat Survey Report, Denovan, Denovan Road, Denny, FK6 6BJ* (GLM Ecology, August 2016). I can confirm that SNH accepts the results of this bat survey that there are no bat roosts present in the two trees to be felled and that the proposed development would have a negligible impact on any bat species present on site for foraging.

I hope this comment is useful, but please let me know if any clarification is required.

Kind regards,
 Neville

Neville Makan CEnv MCIEEM
 SNH Operations Officer, Forth

Tel: 0131 316 2649
 Rec: 0131 316 2600

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Thoiribh an aire airson adhbharan gnothaich, 's dòcha gun tèid sùil a chumail air puist-dealain a' tighinn a-steach agus a' dol a-mach bho SNH.

Our ref: PCS/149897
Your ref: P/15/0022/FUL

If telephoning ask for:
Diarmuid O'Connor

15 November 2016

Antonia Sobieraj
Falkirk Council
Development Services
Abbotsford House
Davids Loan
Falkirk
FK2 7YZ

By email only to: antonia.soberaj@falkirk.gov.uk

Dear Sir

Planning application: P/15/0022/FUL

Development of Land to Form Holiday Park with Raised Deck Mounted Chalets, Camping Pods, Deck Mounted Reception Building and Ancillary Roads & Drainage Land To The South West Of Denovan House Denny

Thank you for your consultation email which SEPA received on 07 November 2016. We note that the above application is currently being reviewed by the planning review committee, we would highlight that we have not previously been consulted on the above planning application.

We **object** to this planning application on the grounds of lack of information in respect of flood risk and potential impact on people and property from flood risk. We will review this objection if the issue detailed in Section 1 below are adequately addressed.

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, which may take account of factors not considered at the planning application stage.

Advice for the planning authority

1. Flood Risk

- 1.1 We have reviewed the information provided in this consultation and it is noted that, the application site (or parts thereof) lies adjacent to the medium likelihood (0.5% annual probability or 1 in 200 year) flood extent of the SEPA Flood Map, and may therefore be at medium to high risk of flooding. The application site is also adjacent to two small watercourses which are <3km² and hence not included within the SEPA Flood Map methodology but may still pose a risk of flooding. In 1909, the River Carron is described as rising 3.6 metres at Denovan which may have extended close to Denovan Road.
- 1.2 The site is adjacent to a small watercourse to the south of application site. The 1:200 year modelled fluvial functional floodplain also extends close to Denovan Road. Topographic information supplied in the Site Section Locations drawing (ref. no. 4953.d.07a, dated 07/03/2015) indicates the holiday chalets located closest to the River Carron are elevated on ground levels above 32.5mAOD and a minimum finished floor level 34.5mAOD. The

Denovan Road adjacent to the chalets is approximately 30.2mAOD. As such we are satisfied that the risk to the chalets from the southern small watercourse and the River Carron is mitigated.

- 1.3 There are pods located immediately adjacent to Denovan Road and would appear to be the same elevation as the road. As no information has been submitted regarding the height difference between the adjacent small watercourse and both bank levels we cannot confirm that the pods are free from flood risk and as such we **object due to a lack of information**. We would recommend that this information is submitted or the pods are elevated higher on site. It may be advantageous to locate the pods on higher ground to reduce the likelihood of water ponding on site affecting the pods. A solid boundary wall at the foot of a steep slope will increase the risk of water ponding behind it.
- 1.4 The small watercourse to the east of the application site is culverted adjacent to the site. This watercourse is approximately 90 metres away from the site boundary based on the Digital Rivers Network and OS contours indicate a flow path to the east of Denovan House and not through the site. Based on the information submitted, we are satisfied that the chalets are not at risk of fluvial flooding from this source.
- 1.5 The site is reasonably steep therefore the applicant should consider incorporating flood resistant and resilient measures into the design and construction of the site to mitigate the risk from surface water flooding. This could include raised finished floor levels and landscaping the ground to direct water away from dwellings. These measures should not increase the flood risk to existing property or infrastructure.
- 1.6 We would recommend that contact is made with your Flood Prevention Authority to glean any information/ local knowledge that they may possess.
- 1.7 If your authority requires further comment from us, additional information would be necessary to enable us to comment upon the flood risk at the application site in line with the principles of Scottish Planning Policy (2010), SEPA-COSLA Protocol (as updated 2011) and the duties of the Flood Risk Management (Scotland) Act (2009).

2. Waste Water Drainage

- 2.1 We note that the applicant is proposing private drainage arrangements to serve the new development. Treated effluent will be discharged to a new soak away.
- 2.2 It should be noted that any private treatment for waste water drainage requires authorisation under the "The Water Environment Controlled Activities (Scotland) Regulations 2011 (as amended) (CAR) if not already obtained.

- 2.3 Our environmental protection team has had previous correspondence (March 2016) with the applicants regarding the foul drainage arrangements where we suggested that a development of this size should investigate discharge to soakaway. In principle a soakaway as proposed in the supporting documentation **is potentially consentable** under the above regulatory regime and therefore we offer no objection to this element of the proposal at the planning application stage. However, since the population equivalent (pe) of 60 is greater than the threshold of 50 pe in section 3.7.1 of WAT-RM-04, significant investigatory and monitoring work will be required at the CAR application state. An intrusive site investigation etc. will be carried out by a competent person. For the avoidance of doubt a CAR licence application will be required for this proposal.
- 2.4 We would highlight that it is at the applicant own commercial risk if changes to the planning permission are required in order to comply with the relevant regulatory regime.

Detailed advice for the applicant

3. Flood Risk Caveats & Additional Information for the applicant

- 3.1 The SEPA Flood Maps have been produced following a consistent, nationally-applied methodology for catchment areas equal to or greater than 3km² using a Digital Terrain Model (DTM) to define river corridors and low-lying coastal land. The maps are indicative and designed to be used as a strategic tool to assess flood risk at the community level and to support planning policy and flood risk management in Scotland. For further information please visit http://www.sepa.org.uk/flooding/flood_maps.aspx.
- 3.2 We refer the applicant to the document entitled: “*Technical Flood Risk Guidance for Stakeholders*”. This document provides generic requirements for undertaking Flood Risk Assessments and can be downloaded from www.sepa.org.uk/flooding/planning_flooding.aspx. Please note that this document should be read in conjunction Policy 41 (Part 2).
- 3.3 Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding. The document will take only a few minutes to complete and will assist our review process. It can be downloaded from http://www.sepa.org.uk/flooding/planning_flooding/fra_checklist.aspx
- 3.4 Please note that we are reliant on the accuracy and completeness of any information supplied by the applicant in undertaking our review, and can take no responsibility for incorrect data or interpretation made by the authors.
- 3.5 The advice contained in this letter is supplied to you by SEPA in terms of Section 72 (1) of the Flood Risk Management (Scotland) Act 2009 on the basis of information held by SEPA as at the date hereof. It is intended as advice solely to Falkirk Council as Planning Authority in terms of the said Section 72 (1). Our briefing note entitled: “*Flood Risk Management (Scotland) Act 2009: Flood risk advice to planning authorities*” outlines the transitional changes to the basis of our advice inline with the phases of this legislation and can be downloaded from www.sepa.org.uk/planning/flood_risk.aspx.

Regulatory advice for the applicant

4. Regulatory requirements

- 4.1 Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website. If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the regulatory team in your local SEPA office.

If you have any queries relating to this letter, please contact me by telephone on 0131-2737361 or e-mail at planning.se@sepa.org.uk

Yours faithfully

Diarmuid O'Connor
Senior Planning Officer
Planning Service

ECopy to: McFarlane Curran, colm@mcfarlanecurran.co.uk

Disclaimer

This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).

From: [Gary Allan](#)
To: [Sobieraj, Antonia](#)
Cc: [Scot Yaxley](#); [Richard Laing](#)
Subject: Denovan Road Development
Date: 18 November 2016 13:11:31
Attachments: [Local Planning Review.docx](#)

Hi Antonia,

Trust you are well.

Please find attached our comments on the additional information submitted by the applicant in relation to the above development. Trust this meets with your understanding, however should you have any queries please do not hesitate to contact me.

Gary Allan Beng(hons) CEng MICE

Principal Engineer

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Local Planning Review - P/15/0022/FUL - Development of Land to Form Holiday Park with Raised Deck Mounted Chalets, Camping Pods, Deck Mounted Reception Building and Ancillary Roads and Drainage at Land To The South West of Denovan House, Denny

Introduction

At the request of Falkirk Council, a review of documents relating to the proposed development of land to form a holiday park at Denovan Road, Denny, has been carried out. The prospective development is to comprise raised deck mounted chalets, camping pods, a deck mounted reception building and ancillary roads and drainage at land to the south west of Denovan House, Denny. Access to the development is proposed via a new simple junction onto Denovan road.

Documentation under review

The documents considered in this review included:

- Proposed Holiday Park Development, Denovan Road, Denny, Transport Statement; Falkirk Council Reference: **P/15/0022/FUL**;
- Development Services Memo dated 25 March 2015; Falkirk Council Reference: **150325/CR/P/15/0022/FUL** ;
- **Appendix 1.1 ATC Results – Denovan**;
- **Appendix 1.2 ATC Results – Denovan**;
- **Bat Survey Denovan**;
- **FIR Response to Falkirk Council 10-16**;
- **Flows and Loads Denovan**;
- **MI-STP-Brochure-0115-B**;
- **Revised Layout Showing Retaining Trees**;
- **Village Rules and Courtesies – TMS Alts 10-16**;
- **GCLBQ598 Wesley Edmunds Denovan**;
- **Denovan Soakaway Detail**; and
- **DENOVAN CALCULATIONS**

Committee Requested Information

The council in its letter of the 4th November 2016 to Mouchel, highlighted they had requested further information from the developer. An appraisal of the additional information submitted by the applicant against these requests is presented below and numbered as per the Council's letter. **FIR Response to Falkirk Council 10-16** outlines how the developer has aimed to address the council's request for further information.

1. A transport statement has been provided. Subject to the comments noted below this appears to address the council's request.
2. From the information forwarded by the council, no landscape capacity assessment appears to have been undertaken by a Landscape Architect. Within the developer's response some information is provided which may inform the council's consideration.
3. The submitted Rules and Courtesies provides information on how the development would manage the facility and its impacts on the local community, which appears to address the council's concerns.
4. From the information forwarded by the council, insufficient details have been provided on the proposed internal road geometry, gradients and cut/fill balance etc to address the council's concerns. Consideration of the comments below should be considered.

5. Details have been provided upon the proposed drainage system. Within the developers response some information on flooding has been provided which may inform the councils consideration.
6. Within the developers response some information on trees has been provided which may inform the councils consideration.
7. A bat survey has been undertaken. Subject to the comments noted below this appears to address the councils request.

General Comments

Proposals submitted are of a high level and will require to be developed further should planning permission be granted. It is assumed that as part of such permission the developer would require to attain approvals including RCC. Such permission should consider requiring Road Safety Audits given the safety concerns highlighted below.

Comments on the Transport Assessment (including appendices):

- Figure 2.2 (illustrating the distribution of road traffic accidents, 2011-2015, in proximity to the prospective development site) has been extracted from the publicly available online resource, Crashmap (www.crashmap.co.uk). It is recommended that the Crashmap accident records should be confirmed against available council records.
- In Section 2.11, details should be provided regarding the specific causes / circumstances surrounding the incident recorded along Denovan Road. Due to the relationship between the number of accidents and traffic flow, accident rates would also be informative. Section 2.11 should examine whether there exists any evidence on site of unrecorded / damage-only accidents.
- In Section 2.14 a brief analysis of existing traffic flows should be presented to allow the implications of the development to be understood (patterns/peak flows/ seasonal flows/ other notable destinations on the Denovan Road).
- In Section 2.19, should confirm the presence of any school bus services or otherwise
- Sections 3.3 and 3.16 of **P/15/0022/FUL** have described conditions on Denovan Road – adjacent to the proposed development site access – as a ‘straight section’. The junction approach to the proposed development access is situated on the inside of a large bend in the road. Considering this Stopping Sight Distance (SSD) on approach to the junction as well as the junction visibility splays should be considered to allow drivers on the Denovan road and from the access to make informed decisions. Potential obstructions to these visibility requirements include vegetation along the road, vehicles within the proposed car park and the proposed Glamping pods.
- Projections of traffic generation indicated in Section 3.14 appear reasonable for the size of the development; however, it should be clarified whether the stated ‘38 traffic movements’ is a one-way or two-way flow. Cited in Table 3.5 of **P/15/0022/FUL**, the ‘Peak Arrival Trip Rate – per day’ value of 1.121 for vehicles may be slightly higher in peak periods.
- Revised development drawings suggest 7 chalets, 1 cabin and 10 glamping pods. The logic suggested in Section 3.17 ‘to allow for one car parking space per chalet / glamping pod, with an extra 10% to allow for visitors and staff’ and the resulting proposal for 20 parking bays appears reasonable.
- Section 4.1 highlights the existing pedestrian / NMU path to Denny. Confirmation that the facility is part of the council’s core path network / is a legal right of way as suggested by existing signage should be provided.

The **Bat Survey Denovan** document, Section 1.9, clarification should be provided to why the bat survey was limited only to the two trees to be felled as there are other mature trees which are in close proximity to the development.

The **Revised Layout Showing Retaining Trees** shows the development is within an area of undulating topography. The developer should ensure that a reasonable “dwell” area on approach to the public road can be provided without adversely impacting upon the internal roads of the development.

The drainage details provided in **Flows and Loads Denovan, MI-STP-Brochure-0115-B, Denovan soakaway detail, GCLBQ598 Wesley Edmunds Denovan letter and DENOVAN calculations** in principle appears reasonable. More information of the detailing would be required as part of the RCC process to confirm the acceptability of the proposals for construction.

No specific comments have been made on the **Rules and Courtesies – TMS Alts 10-16 or FIR Response to Falkirk Council 10-16**.