

Dollar Community Council

Response to the Five-Year Review of the Local Development Plan for Dollar.

Introduction

In 2018 two proposals for planning 'in principle' for the H46 Dollar settlement expansion site were brought forward to the community. One being application **0018/00283/PPP** from **Cowden Farm Ltd and Dollar Academy Trust**, which proposes houses on the Newfield site and the fields South of the town either side of Devon Road. The proposal is for 380 houses and a sports field/stadium for Dollar Academy Trust. The other being **19/00018/PPP** from **Harviestoun Estate**, which proposes 180 houses and some retail facilities to the east of the town primarily south of the Muckhart Road. These proposals for a 540-house expansion of the Town with around 950 existing houses has brought into sharp focus for the existing residents the implications of the existing allocated area for development in the current Local Development Plan (LDP) for Dollar.

Following the initial presentation to the community of these proposals by the landowner's agents; Dollar Community Council (DCC) in accordance with Scottish Parliament legislation initiated a community engagement process focused around consultation and the gathering of views from the local community and communicating the views of the community to the planning department at Clackmannanshire Council.

In relation to community engagement there have been three very well attended public meetings as well as several paper/postal and electronic surveys which have collated the community's views on specific and general aspects of these proposals. Interest and engagement from the community has been high with the DCC having received written submissions from over 400 residents which communicate a range of points, issues and concerns. The strength of feeling about the proposals for planning can be seen in the formal objections raised by over 250 people in relation to the application **0018/00283/PPP** from **Cowden Farm Ltd and Dollar Academy Trust**.

The DCC planning group have met at regular intervals with Clackmannanshire Council planning department to present the points, issues and concerns of the community as gathered in the surveys and public meetings. The DCC has also received updates as to the progress of the proposals through these meetings and it has been felt to have been an informative and helpful process.

The Dollar Community Council very strongly feels that the issues raised by the community through these processes should be considered when reviewing the Local Development Plan for the Town.

The Need for Sustainable Development

In principle, the community was not opposed to some development of the town. It was particularly considered that there is a need to increase affordable housing availability within the town. Currently, within Dollar house prices are generally 10% higher than the rest of Clackmannanshire. It was considered that more affordable housing would allow children of existing families to remain in the town and make it more affordable for families from lower income brackets to move into the town to enhance the social mix.

There was also a strong expression amongst the community for the need for 'step-down' housing for many of the elderly residents in the town who wished to move to more manageable and purpose-built properties whilst still being able to stay in Dollar.

There was also recognition that any development plan should include development of the current civic amenities through the expansion of the primary school, health centre and community centre which are all co-located at the north of Newfield.

There was also a general recognition that for Dollar to develop in a sustainable way it requires to become more of a destination for people to visit from outside for tourism and recreation. With further developments around existing attractions including the Dollar Glen and Castle Campbell and the Devon Way as well as the development of new ones. For investment in tourism to come into the town it was also recognised that Dollar requires vastly improved public transport links and the preservation of its conservation areas and open spaces such as the Mill Green. Easy pedestrian access to the hills, the river Devon and neighbouring villages is required to maintain the general rural character of area.

Sustainability of the Current Local Development Plan

A. Size and Nature

The most frequent issue raised by the community was the number of houses proposed. It was considered by **everyone** who expressed an opinion that Dollar, as a small rural town, would be irrevocably changed by a **50%** expansion of residential dwellings. This would considerably alter the nature of the community.

When considering that there are currently no major employment opportunities within Dollar or its immediate surroundings it is highly probable that there will be a substantial increase in commuter travel to and from the town as potential new residents' commute to and from work. This would have an impact across the areas in the central belt for example, in the direction of the Clackmannanshire and Kincardine Bridges towards Edinburgh and Glasgow, West towards Stirlingshire, North towards Perth (potentially impacting on Glendevon).

The general feeling was that Dollar would change in nature from a relatively self-contained small rural town to a medium size commuter town. Due to its location and poor public transport links it would be heavily reliant on travel by car to work destinations which would primarily be out-with a 15-mile radius of the town. Dollar would, in effect, become a dormitory town as seen in much of rural England

B. Infrastructure Demands

The second most frequently raised issue was that of roads and parking within the town and surrounding area. Again, issues of sustainability for such a large increase in a population who would most likely be commuting to work were raised. Of concern was the increased volume of traffic moving from the Newfield site of (80 Houses) across of a busy junction at the entrances to the primary school, health centre and community centre. Increased further congestion would be anticipated on the A91 as it passes through the town centre, from the A91 down the B918 to main road towards the Clackmannanshire and Kincardine Bridges. These routes would be the main feed from the Dollarfield (300 houses) site and Dollar Academy playing field / stadium site.

Subsequent to these issues being raised, it has later been proposed by Cowden Farm Ltd/ Dollar Academy Trust that a new road be built across the Devon Way. This currently serves as a "safe route to school" for children attending Strathdevon Primary as well as a popular pedestrian route to the

health centre and community centre which avoids the busy road junction feeding these amenities from the north. It is also part of the Green Ways cycle, walking and running route from Tillicoultry through Dollar and out towards Muckhart. Formal objections by Dollar residents to the impediment of this well used cycling and pedestrian route through the town have been considerably high. There is a general feeling from the community that the traffic survey conducted by the applicants has markedly underestimated the correct volume of traffic and the troubling nature of the problem additional housing would bring to traffic volume in and around the town.

The lack of parking in the town main streets was also cited by many people as a problem that would be exacerbated by more demand from an increased population. There were fears that “rat runs” would develop along the residential roads running parallel to the south of the A91 as traffic from the southern development would most likely attempt to exit the town to avoid the A91 Bridge Street main through route and the busy junction off Devon Road and Bridge Street.

The proposed development on the Harviestoun Development (180 house) east of the town would also most likely empty onto the A91 at the Muckhart Road end. Here, a roundabout had been proposed to help with traffic flow from the development. This was generally felt to be acceptable by those who commented. It was felt that this would slow traffic commencing into the town especially heavy goods vehicles that come off the M90 at Milnathorpe and head west through the town. The 19/00018/PPP Harviestoun Estate proposal received three comments and no objections from the community when submitted.

In addition to roads, other infrastructure issues were raised in objection to the proposed developments. It was also heavily commented on that development of houses on the Newfield site would prevent the expansion of the current civic amenities. It was considered that even with a modest increase in population size within Dollar the current primary schooling, health and social resources would require to be expanded. This has potentially been further compounded through an increased demand from the proposed new housing development in Muckhart (50 houses) and Solsgirth (65 houses), which both fall within the local health centre catchment area.

With regards to sewage and drainage; worries were expressed that the current sewage facilities in Dollar are already at the point of capacity given that there are regular and frequent discharges into the River Devon at times of peak demand. Scottish Water has however submitted a report stating that there is current capacity for a further 100 houses. This seems at odds with the observations from residents on the ground.

C. Environmental Impact.

Of the many issues identified by this community there was one that raised many objections from both Dollar and Tillicoultry residents as well as local flood action groups. It was strongly considered that the building on the Dollarfield site south of Dollar was particularly dangerous. These fields on either side of Devon Road are recognised as retention areas for water coming off the hills heading down to the river Devon. It was considered that building on these fields, even with the use of suds, would increase the rate at which water moved from the Ochils to the river Devon. Although this may not cause flooding in the development site itself, it would increase flooding south of these fields firstly in the Dollarfield Steadings, the Static Home Park and Lower Mains then further down-stream in Tillicoultry at Sterling Mills Furniture Store, Sterling Mills Retail Park and residences north and south of the river in Tillicoultry. The drainage report submitted by Watermans for the agents of Cowden Farm Ltd and Dollar Academy Trust has been found to be substandard and inaccurate by an

independent hydrology assessment conducted by Kaya Consultants Ltd (see appendix 1) The main findings were:

1. The flood modelling uses inadequate measurements of watercourse and land topography which suggests that the flooding predictions could be inaccurate
2. The locations used in the flood modelling are too close to the proposed development and this could mean that predictions of downstream flooding are inaccurate and;
3. There are large differences in the flood mapping used in the assessments compared with the Scottish Environment Protection Agency (SEPA) official flood maps. Again, this could mean that flooding predictions are inaccurate.

Local experience would also support this. The fields lying between the proposed western development site and the river Devon have been flooded not just in winter but for the whole of the last 18 months. Recently, the Dollar Burn and the River Devon have burst their banks and there has been considerable flooding in the fields immediately south of the eastern development site. These flooding events have culminated in the evacuation of residents from the static caravan park as their homes were flooded and electricity was lost. Flooding of the Lower Mains road had led to partial closure. Flooding in the Dollar Field Steading area also led to road closure there. In addition to this, septic tanks rose from the ground. There were also partial closures off the B819 at the Rackmill Bridge. There has also been flooding incidents in Tillicoultry around the Sterling Mills area again leading to road closures.

Within the other 11 reports submitted with the 0018/00283/PPP application there appear to be several assumptions made that have been highlighted as somewhat dubious. Objections from residents with professional backgrounds in transport planning, environmental science and engineering have highlighted inaccurate statements from the reports such “no increase in Nox or the environment” and “ no effect on town centre” when referring to increased impact of a potential 800 cars from the new proposed sites (see objections from H.West, S.Geddes et al). The report from Kaya consultants and objections raised by a number of people with relevant technical knowledge bring into question the general validity of reporting process used for the 0018/00283/PPP applicants.

D. Community Benefits

Dollar Community Council and Clackmannanshire Council agree that the Local Development Plan for Dollar should be of benefit to the local community as well as the wee county and our nation. Within the 19/00018/PPP presented by Harviestoun there do appear to be a number community benefits. These include a proposed visitors’ site such as a farm shop/eatery, a retail outlet in keeping with the character of the town, a community orchard as well as other open spaces in and around a site of historical interest within the redline boundaries. It also includes plans for affordable housing and stepdown housing.

Unfortunately, the community benefits proposed within the 0018/00283/PPP appear much less tangible. The playing fields and sports stadium proposed by Dollar Academy Trust stated as ‘community benefit’ by the applicants has come with no clear guarantees of access to the wider community. When the agents of Dollar Academy Trust and the Governors involved in the planning from Dollar Academy met with the Dollar Community Council to discuss this it became clear that there was, as yet, no clear business plan as to how this sports site was to develop. The representatives from

the governors admitted that they were unsure if they would be able to secure funding for any building and development on this site for many years to come if at all (minutes of DCC meeting 18/03/2019).

Subsequently, an offer of the field south of the Dollarfield west development was made to the community by the representatives of the Cowden Farm applicants. After some deliberation between Dollar Community Council, the Dollar community Development Trust and the wider community this was rejected. The main reason for rejecting this offer was that the field in question had been flooded over the previous winter and summer, was bordered on two sides by burns carrying water from the proposed development site and on another side by the river Devon. It was considered that the costs and liabilities of maintaining this field and its water courses to prevent flooding on the proposed development site uphill from this field, and any downstream flooding into the river Devon that might affect Tillicoultry, heavily out-weighed any gains the community might have made through the development of a wild fowl park (minutes DCC meeting 19/10/2019).

The First submission of proposal 0018/00283/PPP outlined the extension of Strathdevon Primary School to the east which would require the demolition and loss of the Hive Community Centre. While welcoming the expansion of the primary school provision to meet any new demand, the loss of a community centre would **not** be a community benefit. The second submission of proposal 0018/00283/PPP has included placing a road diagonally across the Devon way preventing access to Strathdevon primary school, the health centre and community centre for those coming from both west and east along the Devon way. The loss of access from the Devonway to these civic amenities - **particularly the loss of the “safe route to school”** - would **not** be a community benefit.

The 0018/00283/PPP appears to offer several tangible community losses and no clear benefits.

Summary and Recommendations

There has been strong engagement from Dollar community in the local development plans. A large volume of considered responses from the community have been gathered in response to more concrete proposals presented by the two ‘proposed planning in principal’ applications. Neither of these has, of yet, been approved by Clackmannanshire Council for adoption.

The community recognises the need for some expansion of the town. In summarising the desires of the residents they would like to see measured sustainable development that includes affordable housing, step down housing and infrastructure developments, while retaining the rural nature of the town that could be sustained by the development of tourism within the town rather than just by expanding housing and increasing commuter travel.

It is also considered that the current Local Development Plan allows for too many houses which would fundamentally change the nature of the town. This would detract from its central features as a small rural town with easy access to the hills, castle and river. This in turn would undermine potential for development as a destination for others within and out with Clackmannanshire that would help develop it as a tourist destination and not just a commuter town serving areas mostly outside of Clackmannanshire.

As part of the current Local Development Plan however the 19/00018/PPP application from Harviestoun Estates provides much of what the community would like to see in relation to the **sustainable** expansion of the town. This includes an acceptable number of houses that includes affordable and step-down housing in line with the layout and design of the rest of the town and incorporates open spaces which allow for access to the surrounding countryside. There is potential

for open spaces to be used for community benefit and easy walking access to civic amenities. Opportunity for retail and tourist activity that would hopefully bring people into the village to enjoy its beauty is also outlined and considered beneficial. The absence of formal objections and several positive comments made in the public meetings and as formal submissions is an indication development can be done in a conjunction with the local community.

Other aspects of the current Local Development Plan have been less well received by the community. In the many statements of objection to application 0018/00283/PPP the community has made it clear that they are concerned that the number of houses proposed therein will have detrimental impact on roads, parking and infrastructure within the town. Benefits from the development appear to be restricted to the applicants with the community suffering the loss of safe access along the Devonway, the community centre and the adjacent amenity ground through the proposed and necessary expansion to the School and health centre into Newfield.

More alarmingly, the drainage report provided by the applicants 0018/00283/PPP has been shown by Kaya hydrology consultants to provide no reassurance that there will not be an increase in flooding when these water retention areas are built upon. No reassurances have therefore been provided for the small settlements of the Dollarfield Steadings, Dollar Caravan Park and Lower Mains to the south of this area of the Local Development Plan and for those business and residents of Tillicoultry as well as Clackmannanshire Council who hold ultimate responsibility.

Dollar Community Council propose in line with the views presented by the Dollar community that:

1. The current Local Development Plan area to the east of the town included in the proposal for planning in principle 19/00018/PPP should be retained in the future LDP for the development of housing, a retail site and potential tourist sites and as open spaces for potential community use and benefit as outlined in the current Harviestoun proposal
2. All current Local Development Plan areas known as Newfield should be retained within the Local Development Plan for the development of civic amenities including the primary school, health centre and community centre expansion and open spaces for recreation.
3. That if Clackmannanshire council still propose any housing development in Newfield area, that it should be specifically designed for the elderly and /or infirm and / or should be local authority and / or housing association owned and be within the "affordable housing" remit.
4. That any such housing should take up no more than half of the available area of Newfield to allow sizable growth of the civic amenities.
5. The area south of the town described as Dollarfield East and Dollarfield west be withdrawn from the Local Development Plan. The main reasons being firstly the number of houses planned for development within other sites in and around Dollar and Ochil East already exceed the 350 initially outlined in the 2011 Local Development Plan proposal. Adding a further 300 would be more than excessive. Secondly, there appears to be a lack of any real plan for the development of the Dollar Academy sports grounds. Finally, the unquantified flooding risk that any development here may pose to the local communities and the wider Devon Valley basin cannot be ignored.

6. If Clackmannanshire Council wish to reinstate the Dollarfield east and Dollarfield west sites into the Local Development Plan this should only happen if:
- (a) Firstly, there is a full and accurate drainage and flooding analysis and report which convincingly concludes that there would be no increased risk of flood on the proposed development site, other local residencies in the surrounding areas and other towns and settlements downstream of the Devon from the development of the Dollarfield sites **and** that any assessment of flooding risk be carried out by consultants that are acceptable to the applicants, Clackmannanshire Council planning department and Dollar Community Council.
 - (b) Secondly, when the impact of any housing developments on the proposed Harviestoun (19/00018/PPP) and Solsgirth (19/00/272/FULL) sites been fully evaluated for their impact on Dollar and there is a real and considered need for further housing.
 - (c) Thirdly that a coherent resolution is found to the ongoing road and transport issues surrounding the Dollarfield and Newfield sites.

Dollar Community Council.