
Report to Planning Committee

Date of Meeting: 23rd January 2025

Subject: Erection of a Well-Being Hub (Class 11) Including Swimming Pool, Sports Hall and External Sports and Play Facilities and Erection Of Additional Support Needs School with External Play Areas (Class 10), with Electricity Sub-Station, Landscaping , Drainage, Access and Parking and Sustainable Urban Drainage at Land At Alloa West, Smithfield Loan, Alloa - (Ref:24/00149/FULL)

Report by: Keith Johnstone, Principal Planner

1.0 Purpose

- 1.1. The Report provides an assessment of the above application for planning permission having regards to the provisions of the Development Plan (NPF4 and adopted Clackmannanshire Local Development Plan) and any other material considerations, including advice from consultees and objections from third parties. It provides a recommendation on the application.
- 1.2. The proposed development falls within the class of Major Development insofar as the site area exceeds 2 Ha. The Council has a financial, land ownership or other interest in the development and is subject to one or more representations. Consequently, the application has to be determined by the Planning Committee rather than under the Council`s Scheme of Delegation. The Council is also the applicant for the proposed development.

2.0 Recommendations

- 2.1. It is recommended that the application is **APPROVED** subject to the following conditions and reasons;
1. The development to which this permission relates must commence not later than the expiration of 3 years from the date of this permission or, as the case may be, when the permission is deemed to be granted.
 2. Unless otherwise agreed in writing by the Council as planning authority, before the Well-Being Hub hereby approved is opened to the public;
 - i) details of a scheme to deliver a bus service that would connect the site to Alloa Town Centre shall have been submitted to and approved in writing by

the Council, as planning authority in consultation with the Transportation Service, and,

- ii) the bus service as approved has been brought into service.

The scheme referred to in i) above shall include details of; the hours and frequency of operation of the service which shall be designed to serve the opening hours of the Well-Being Hub and include, as far as reasonably practicable, the predicted periods of peak demand for travel; the proposed arrangements for delivery and operation; an assessment of how the service would integrate with existing public transport services serving Alloa Town Centre; and the arrangements for monitoring and reviewing the delivery of the service in the future. The approved scheme shall operate for a minimum period of 5 years from inception, unless otherwise agreed in writing by the Council, as planning authority.

3. Unless otherwise agreed in writing by the Council as planning authority, before the Well-Being Hub hereby approved is opened to the public;

- i) details of a scheme to provide safe, convenient and accessible active travel routes to and from the site shall have been submitted to and approved in writing by the Council, as planning authority in consultation with the Transportation Service, and,

- ii) the works specified in the approved scheme have been implemented and completed to a standard adoptable by the Council.

The scheme referred to in i) above shall include; a review to identify key active travel routes to be improved to serve the Well-Being Hub; a detailed specification for the proposed works designed to deliver safe and accessible active travel infrastructure to a standard adoptable by the Council; and the arrangements for implementation of the works and adoption by the Council. Notwithstanding the outcome of the review, the scheme shall include measures to deliver an active travel route between the site and Alloa Town Centre to a standard acceptable to the Council as planning and roads authority.

4. Unless otherwise agreed in writing by the Council as planning authority, before the Well-Being Hub hereby approved is opened to the public;

- i) details of the location and design of a signalised crossing on Smithfield Loan in the vicinity of the main access to the application site, together with speed tables on both approaches to the signalised crossing, shall have been submitted to and approved in writing by the Council, as planning authority, in consultation with the Transportation Service, and;

- ii) the approved details shall have been completed to a standard adoptable by the Council.

The speed tables referred to in i) above shall be designed to also accommodate HGV and bus access.

5. Before any construction works commence on site to erect buildings, the following details shall have been submitted to and approved in writing by the planning authority;

- a) A detailed specification for any lighting and floodlighting of outside spaces and the exterior of buildings within the site. This shall include luminance levels, light spillage and coverage of areas of lighting. The specification shall be produced having regard to the guidance published by the Institution of Lighting Professionals titled Guidance Note 01/21 – The Reduction of Obtrusive Light and Guidance Note 08/23 – Bats and Artificial Lighting.
- b) Details of the location and design and colour of any means of enclosure within and around the perimeter of the site. This shall include the specification for the design and ongoing maintenance of the 2.5 metre high acoustic barrier to be installed to enclose the external plant compound at the north end of the building generally as annotated in blue on Figure A3.4 contained in the document by New Acoustics.
- c) Details of the colour and finish of the materials to be used on the exterior of the buildings hereby approved and any areas of hard surfacing within the site.
- d) Details of the finalised specification of active travel infrastructure to be provided within the site. This will include the details required to fully address the points contained in the consultation response from Transportation dated 5th November 2024 under the heading “Active Travel Infrastructure within the Site”. This shall include details of path widths, interactions with vehicles, and the type of cycle parking provision including secured covered parking for staff and visitors and facilities for e-bikes.
- e) A detailed specification for the planting, elements and habitats generally as annotated on the documents titled Site Plan dated 27th June 2024 (dwg no WHLS-RAN-XX-XX-DR-L-0001 rev PO4) and Wellbeing Hub and Lochies School Landscape Design Report dated June 2024 both by Rankin Fraser. The details shall include plant species, plant sizes, planting distances, means of protection and establishment, timing of implementation and arrangements for future management and maintenance of the plants and habitats to maintain their landscape and ecological value. The specification shall include proposals for native species, hedges should include a mix of native species and of wildlife value wherever practicably possible. Where feasible, provision of bat and bird boxes should be included.
- f) Details of the siting, design, specification and phasing of outdoor spaces and equipment for children and young peoples` play and recreation within the site, generally in accordance with the proposals in the Landscape Design Report dated June 2024 by Rankin Fraser. The details shall also include the arrangements and parties responsible for the upkeep of the facilities.
- g) A public art strategy document which outlines the proposed arrangements to provide or contribute towards public art provision within the development.

h) Details of a Travel Plan or Plans for the development including proposed targets to encourage sustainable travel to and from the site and the arrangements for delivering the approved targets and the process and responsibilities for monitoring and review. The Plan shall be agreed before the first use of the building to which it relates.

Thereafter, the development shall be implemented in accordance with the approved details, unless otherwise agreed in writing by the planning authority.

6. Before any development commences on site, details of a Construction Environmental Management Plan shall have been submitted to and approved in writing by the planning authority. The Plan shall include;

a) Details of the proposed phasing and predicted timescales for implementation of the development, including arrangements to minimise the potential impacts of the construction workers on users of the site and on the surrounding area.

b) Measures to minimise the risk of nuisance from noise, vibration, dust and external lighting generated during the construction phase, including potential impacts on neighbouring residents and businesses and wildlife interests.

c) Arrangements to regulate plant operation, activity and vehicle movements on site. Operations or vehicle movements or loading and unloading from which noise is audible at the nearest noise sensitive premises shall only be carried out between 0800 and 1800 hours Monday to Friday and 0830 and 1400 hours on Saturdays, and shall not be carried out at any time on Sundays without the prior agreement in writing of the Planning Authority.

d) The arrangements to minimise and mitigate the environmental and road and pedestrian safety impacts of HGV delivery movements travelling to and from the site on Blackgrange Road.

e) The arrangements to comply with the mitigation measures set out in; Paras 4.4.1, 4.9.1 and 4.10 of the Preliminary Ecological Appraisal Report by Direct Ecology dated 21/7/2024; and Para 5.1.2 of the Habitats Regulations Appraisal dated 8/11/2024 by Echoes Ecology Ltd.

f) Details of the arrangements to communicate and liaise with neighbouring residents and landowners during the construction period.

Thereafter, the construction works shall be implemented and completed in accordance with the approved Construction Environmental Management Plan, unless otherwise agreed in writing by the planning authority.

7. The development shall be implemented in accordance with the details contained in the documents specified below, unless otherwise agreed in writing by the planning authority;

a) The mitigation measures relating to bats set out in Section 4.4.1 of the Preliminary Ecological Appraisal Report by Direct ecology dated 21/7/2024

- b) Proposed 1:1000 Year Flood Event Overland Flows and Drainage Requirements (dwg no WHLS-BLY-ZZ-ZZ -D-C-960008 PO2) dated August 24 by Blyth and Blyth.
- c) Proposed Levels (dwg no WHLS-BLY-ZZ-ZZ -D-C-950010 PO1) dated August 24 by Blyth and Blyth.
- d) Preliminary Drainage Strategy (dwg no WHLS-BLY-01 ZZ-DR-C-96001 PO1) dated January 24 by Blyth and Blyth.
- e) Flood risk and overland flow - Proposed Overland Flow (dwg no WHLS-BLY-ZZ-ZZ -D-C-960008 PO1) dated August 24 by Blyth and Blyth.

8. Unless otherwise agreed in advance in writing, the development hereby approved shall be implemented in accordance with the details contained in the following documents;

- a) Tree Retention and Protection Plan (dwg no WHLS-RAN-XX-XX-DR-L-0004) dated 27/6/24 by Rankin Fraser.
- b) Proposed Tree Removal Plan (dwg no WHLS-RAN-XX-XX-DR-L-0003), dated 27/6/24 by Rankin Fraser.

9. Any trees and shrubs within or adjacent to the site not identified for removal in the above Plans shall be protected throughout the entire duration of construction work in accordance with BS 5837 (2012) – Trees in Relation to Construction, unless otherwise agreed in writing by the planning authority. The protection measures shall be installed before development commences on site.

10. The building hereby permitted shall not be occupied until;

- a) any remediation works approved as part of the remediation strategy have been carried out in full and in compliance with the approved strategy. If during the remediation or development work new areas of contamination are encountered, which have not been previously identified, then the additional contamination should be fully assessed and an adequate remediation scheme shall be submitted to and approved in writing by the planning authority and fully implemented thereafter ;
- b) a verification report, produced on completion of the remediation work, has been submitted to and approved in writing by the planning authority. Such report shall include:
 - i) details of the remediation works carried out and
 - ii) results of verification sampling, testing and monitoring and
 - iii) all waste management documentation showing the classification of waste, its treatment, movement and disposal in order to demonstrate compliance with the approved remediation strategy.

If during the development work, areas of contamination are encountered, then the applicant shall immediately notify the planning authority. The nature and

extent of any contamination found shall be fully assessed by way of a site investigation and an adequate site investigation report and remediation strategy shall be submitted to and approved by the planning authority. Any remediation work agreed shall be fully implemented and a remediation verification report submitted to and approved in writing by the planning authority.

11. Unless otherwise agreed in writing by the planning authority, the development shall be implemented in accordance with the details contained in the Report titled Alloa West Well Being Hub & Lochies School Plant Noise Assessment Rev 00 dated 16/11/24 produced by New Acoustics. Before its installation, details of the specification and arrangements for future maintenance of the proprietary 2.5 metre high acoustic screen to enclose the external plant compound (generally as annotated in blue on the drawing Figure A3.4 in Appendix 3 of the above report) shall have been submitted to and agreed in writing by the planning authority. The acoustic screen shall be installed as approved prior to the first operation of the mechanical plant located within the Well-Being Hub plant compound area.

Reasons

1. As required by Section 58 of the Planning (Scotland) Act 2019.
2. To retain effective control over the design and delivery of this off site mitigation measure in the interests of sustainable transport provision and accessibility of the site.
3. To retain effective control over the design and delivery of this off site mitigation measure in the interests of sustainable transport provision and accessibility of the site.
4. To retain effective control over the design and delivery of this off site mitigation measure in the interests of road safety and to encourage trips by active travel and public transport.
5. Further details are required and in the interests of visual and residential amenity, biodiversity, well-being and health and sustainable travel.
6. To help safeguard the amenity of the area during the construction phases of the development.
7. To retain effective control over the development.
8. In the interests of visual amenity and to minimise any impact on the biodiversity value of the woodland and trees.
9. To retain effective control of the development during the construction phase (s) in the interests of the amenity and biodiversity value of the area.
10. To ensure that any ground contamination that may be present is subject to appropriate remediation measures as specified and undertaken, to ensure the health and safety of future occupants of the proposed development as well as construction workers and others.

11. To safeguard the amenity of the surrounding area.

2.2 Note to Applicant

Display of notice: A notice must be displayed on or near the site while work is being carried out. The planning authority can provide more information about the form of that notice and where to display it. (See Section 27C of the Town and Country Planning (Scotland) Act 1997 Act (as amended) and Schedule 7 to the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013.)

As recommended in the Preliminary Ecological Appraisal Report if any of the trees within the site boundary noted to have bat roost potential are to be felled or limbed, further surveys should be undertaken by a licensed bat surveyor.

2.3 Reasons for Decision

1. Subject to the proposed conditions, overall it is concluded that the development would not be contrary to the policies and provisions of the development plan comprising National Planning Framework 4 and the adopted Clackmannanshire LDP 2015, including in Supplementary Guidance Nos 1 3, 4, 6 and 7.
2. There have been no objections to the application from consultees.
3. Having regard to the objections raised by a number of third parties, including 2 community councils, Alloa First and CTSI, the information submitted in support of the application and the impacts of the proposed mitigation measures, it is concluded that the issues raised in the objections would not outweigh the Development Plan support for the development either individually or collectively, to justify withholding planning permission.
4. The development is considered to deliver a high standard of building design, facilities, environmental standards, external spaces and landscaping and integration with existing active travel networks to contribute positively to placemaking.
5. On balance, it is considered there are no other material considerations which would outweigh the development plan support for the development and justify withholding the partly retrospective permission.

2.4 Approved Plans and Reports

EXZZ PL0001 S4 P01	Location Plan
MB00 PL0001 S4 P01	Level 00 Proposed Ground Floor Plan
MB01 PL0001 S4 P01	Level 01 Proposed First Floor Plan
MB02 PL0001 S4 P01	Proposed Roof Plan
PL0002 S4 P01	Existing Site Plan
PL0011 S4 P01	Bin Store Details
PL0012 S4 P01	Substation Details
PL0101 S4 P01	Proposed Building Section East West
PL0101 S4 P01	Site Cross Sections
PL0102 S4 P01	Proposed Building Section North South

PL0103 S4 PO1	Proposed Building Elevations Sections Part 2
PL0201 S4 P01	Proposed Building Elevations
PL0202 S4 P01	Proposed Building Elevations Part 2
WHLS-RAN-XX-XX-DR-L-0001	Landscape Masterplan
WHLS-RAN-XX-XX-DR-L-0002	Proposed Boundaries Plan
WHLS-RAN-XX-XX-DR-L-0003	Proposed Tree Removal Plan
WHLS-RAN-XX-XX-DR-L-0004	Tree Retention And Protection Plan
	Arboricultural Report 7/6/24
	Design And Access Statement Part 1
	Design And Access Statement Part 2
	Drainage Strategy Report, 25/6/24
	Landscape Design Report Part 1 of 3
	Landscape Design Report Part 2 of 3
	Landscape Design Report Part 3 of 3
08/03/24	Low Zero Carbon Energy Report
	Noise Report – Acoustic Stage A Report Rev P01
16/11/24	Plant Noise Impact Assessment
	Rev 00 7761-01-00
February 24	Phase 1 Ground Condition Survey Desk Study
	Parts 1-7
28/06/24	Planning Statement Well-Being Hub Alloa
09/10/24 PO2	Town Centre First Assessment
	Pre Application Consultation Report
08/03/24	Environmental Report
08/03/24	Mechanical And Electrical Report
13/1/20 (Version 1)	Habitats Regulation Appraisal For Ecology
	Interests Firth Of Forth SPA
22/5/24	Level 2 Flood Risk Assessment Rev 1
12/8/24	TLW Addendum Response to SEPA Holding
	Objection
February 2024	Phase 1 Ground Condition Report Part 1
22/5/24 REV 1	Appendix C of Flood Risk Assessment
EXZZ PL0003 S4 PO1	Revised Proposed Site Plan
21.07.2024 (VERSION 1)	Wintering Bird Report – Issued
21.07.2024 VERSION 1	Preliminary Ecological Appraisal Report
	SI Phase 2 Report Part 1, June 24, Mason Evans
	SI Report Phase 2 Part 2
	SI Stage 2 Report Part 10
	SI Stage 2 Report Part 11
	SI Stage 2 Report Part 12
	SI Stage 2 Report Part 3
	SI Stage 2 Report Part 4
	SI Stage 2 Report Part 5
	SI Stage 2 Report Part 6
	SI Stage 2 Report Part 7
	SI Stage 2 Report Part 8
	SI Stage 2 Report Part 9
P23/432/GD/01	Geotechnical Response Part 1, Mason Evans
P23/432/GD/02	Geotechnical Response Part 2
P23/432/GD/03	Geotechnical Response Part 3
P23/432/GD/04	Geotechnical Response Part 4
P23/432/GD/07	Geotechnical Response Part 5
WHLS-BLY-01-ZZ-DR-C-	Preliminary Drainage Strategy

96001 P01 P23-432-02	Gas Addendum Letter Report Sept 24, Mason Evans
WHLS-BLY-01-ZZ-DR-C- 960008-P02	1-1000 Year Event
WHLS-BLY-ZZ-ZZ-D-C-950010	Proposed Levels
WHLS-BLY-ZZ-ZZ-D-C-960008	Proposed Overland Flow
17/10/24	Response to Transportation Comments of 30/8/24
23/10/24	Transport Planning Response to Transportation Consultation dated 30/8/24 – Parts 1, 2 and 3
11/10/24	Air Quality Assessment

3.0 Considerations

3.1. Background

3.2. The application relates to a proposal by Clackmannanshire Council to develop land for a Well-Being Hub (Class 11) and an Additional Support Needs Primary School (Class 10) on land located to the south west of Smithfield Loan and south of The Pavilions in Alloa.

3.3. The application site extends to approximately 6.5 Ha and largely comprises a level area of agricultural land in arable use. The land is classified as Grade 3.2 and is not prime agricultural land. The curved eastern boundary of the site contains part of a tree belt which is slightly elevated above the field and which was formerly part of a railway line. There is a footpath within the tree belt which is part of Core Path 22. The site also contains a former road embankment which runs east to west which is north of the field and the private road which leads from The Pavilions to Longcarse Farm. The embankment rises to about 4.0 metres above the level of the field and contains trees and shrubs many of which have become established through natural regeneration. The embankment and planting would be retained as part of the proposals.

3.4. The application site adjoins; to the west, a private road beyond which lies arable fields; to the east, the remaining part of the tree belt beyond which lies business premises including yard space; to the north, Smithfield Loan and The Pavilions with the One School Global Caledonia Campus located on the north side of The Pavilions; and to the south, Core Path 22 continues onto Core Path 23 with arable land to its south. The private road which abuts the west boundary is also part of Core Path 21 which links with Core Path 22 and Core Path 20. The latter runs along The Pavilions and is also part of National Cycle Route 76 which extends along both sides of the Forth Estuary and leads to Cambus to the west and Alloa to the east. NCR 76 also connects with NCR 767 (Alloa to Dollar), NCR 768 (Tullibody to Tillicoultry) and NCR 764 (Clackmannan to Dunfermline).

3.5. The site is located within the settlement boundary of Alloa as defined by the adopted Clackmannanshire Local Development Plan (LDP). It comprises the easternmost part of Business Proposal Site B02 (Alloa West Business Park) which allocates the site, together with a large area of agricultural land to the west and the former marshalling yards and 2 small parcels within the grounds

occupied by One School, for development falling within Classes 4 (Business), 5 (General Industrial) and/or 6 (Storage or Distribution).

3.6. The proposed development would comprise a single building which contains 2 segregated secure elements;

- i) an additional support needs primary school which would replace the existing Lochies School in Sauchie. The school serves children with severe and complex additional support needs to access learning, and
- ii) a well-being hub (WBH). The building and site would provide a range of community, leisure and well-being facilities, including swimming and gym facilities which were previously available at the Leisure Bowl before its closure in March 2020.

3.7. The school would be single storey and would;

- Include a dedicated entrance and contain 9 class bases, 3 general purpose bases, dining and kitchen, gym hall and hydrotherapy pool and a multipurpose room. Outwith day time term use, the hydro pool, gym hall, multipurpose room and dining and kitchen spaces could be used for community purposes.
- The replacement school for Lochies will have an increased pupil capacity of 54 although the anticipated number of pupils has been estimated as 42.
- The layout includes an enclosed courtyard area between the 2 classroom wings to provide outdoor learning space and gardens and an enclosed south facing playground to the south of the building containing a range of play and learning features including a Multi Use Games Area.

3.8. The WBH would include;

- At ground level, a 6 lane 25 metre long swimming pool, a teaching pool and a splash pool, a games hall with seating at ground and first floor levels, a fitness suite, changing facilities, Changing Places toilets, and café and soft play.
- At first floor level, a fitness suite containing a gym and community focused facilities including several multi purpose rooms for health and well-being consultation space, meetings and social events and a small café space. The upper floor would be accessed by stairs and a lift.
- Externally, a semi enclosed courtyard garden on the west side of the entrance which will provide a sheltered public space next to the café and provide access to the WBH from the linear park located to the west of the building which would extend along the full length of the west boundary of the site providing an accessible landscaped route . The area to the north of the building will contain a well-being park to complement the building facilities containing a range of spaces including, amenity space, areas with play and exercise equipment for a range of ages, an all weather 5 a side pitch and an archery range.

- Plant rooms located on the north side of the building and external plant located within an enclosed yard to the north of the building.
 - The well-being hub is designed to provide space for: aquatics programme; learn to swim sessions; activity club; range of fitness classes including individual, group and NHS based health activity; holiday camps for children, young people and adults with additional support needs; sport classes (badminton, basketball, archery, football, gymnastics etc.); range of local, regional and national festivals and competitions; soft play; clip and climb; community group meetings and, social activities.
- 3.9. The building design has responded to the shape and orientation of the site, the location of the public road access, the retention of the wooded areas to the east and north land and exploiting the vistas available to the west and north west towards the Ochil Hills and Stirling Castle. The building form has been designed to reflect the peaks and valleys of the Ochil Hills with an undulating roof concept which varies over the WBH and continues above the frontage of the school. The roofs over the class rooms are flat and contain feature light wells. The design includes a double height entrance area to the WBH with areas of glazing around the entrance and courtyard as well as along the west side of the pool and within the fitness suite. A canopy would be installed along the west elevation of the school which would create a sheltered and shaded external space and link for pupils. The canopy would extend across to the swimming pool to enclose the community courtyard. The external finishes to the walls and roofs of the building would primarily comprise a metal standing seam material which would be coloured green to respond to the natural surroundings. The panels would be a mix of 300mm and 500mm widths with a vertical seam to create texture. A section of wall at the school entrance and the internal courtyard outside the classrooms would be faced with stone panels. The canopy would include a sedum roof.
- 3.10. The building is being designed to achieve Passivhaus design standards. The standard delivers a high level of energy efficiency which reduces energy consumption required for heating and cooling and helping to minimise environmental emissions and reduce energy related running costs. The standard also delivers a good indoor air quality through managing air supply and humidity levels to provide good thermal comfort, including mechanical heat recovery. The energy demand that remains would be met by an all electric solution using technology such as Air Source Heat Pumps (ASHP), which would be compatible with a decarbonised grid system. This would contribute towards climate change mitigation.
- 3.11. 67 Full Time Equivalent (FTE) staff as well as a significant number of part-time and casual staff (at least 50) required for the wellbeing hub.
- 3.12. A substation would be installed on land to the south east of the access road which would serve the car parking areas. This would sit within an enclosure comprising metal standing seam cladding to match the WBH building.
- 3.13. The vehicular access to the development would from an existing bellmouth junction on Smithfield Loan which was formed when this road was constructed. The road would provide access to the separate parking and drop off/pick up areas which would serve the WBH and the School. The carpark

serving the WBH would contain 163 spaces with 10% having an electric vehicle (EV) charge point and an additional 50% of all spaces will include ducting infrastructure for future provision. The carpark serving the school would contain 40 spaces as well as drop off/ pick up spaces.

- 3.14. The site would be linked to existing active travel routes comprising; a shared footpath link from the footpath on Smithfield Loan, a new path adjacent to the private road to the west of the site which would provide segregated access from the section of National Cycle Route 76 from the west into the site; a link from the entrance to the WBH to the existing footpath (Core Path 22) which runs along the east site boundary; additionally, a footpath would be provided as part of the linear park which would run along the full western edge of the development, providing an alternative route to the private road which is part of Core Path 21. A controlled pedestrian crossing would be installed on Smithfield Loan near the site entrance as well as 2 speed tables with crossing points nearby to reduce vehicle speeds.
- 3.15. Following negotiations between the Service and Transportation Section with the applicant the application would also deliver ;
- i) A public transport bus service between the site and Alloa Town Centre at a frequency to be agreed by the Planning Service in consultation with Transportation following an assessment of expected demand and operating hours of the facility. The service would be operational before the WBH was first open to the public. The applicant has confirmed that pupils attending the school would have their own dedicated transport.
 - ii) The delivery of upgraded active travel infrastructure outwith the site to encourage active travel trips to and from the site. The precise details would be informed by undertaking an Active Travel and Accessibility Audit and the scope and outcomes will be submitted for the agreement of the Planning Service in consultation with Transportation. The objective will be to create safe and accessible active travel routes for users of the WBH. The applicant has advised that the primary focus of the upgraded infrastructure would be on travel to and from Alloa Town Centre. The agreed works would be completed before the WBH was first open to the public. The applicant has highlighted that pupils attending the school will travel to and from the school by car or bus and active travel trips will primarily be made by those attending the WBH.
- 3.16. The proposed buildings would be sited within a landscaped setting containing;
- i) The retention of most of the existing wooded areas along the north and east boundaries of the site. A small area of tree cover at the northern part of the site would require to be felled to form the access into the site and the archery range. 11 individual trees in total would also be felled, 4 of these would be required to form the link from the site to the footpath on the east boundary of the site. Approximately 80 existing trees surveyed would be retained.
 - ii) A linear park is proposed along the full length of the west side of the site between the west boundary and the WBH and curtilage of the school. This would contain a 3.5m wide path connection with the Core Path at either end, planting including continuous hedge along the west

boundary as well as an avenue of trees and screen planting next to the school playground area as well as seating and outdoor gym equipment. The linear park would provide access to the community garden and WBH.

- iii) The facilities within the well-being park would be set within areas of woodland, tree and hedgerow planting designed to frame the spaces and create biodiversity value. This will include species rich and wildflower grassed areas.
 - iv) Shrub and tree planting within the carpark and pedestrian routes to the entrance of the WBH.
- 3.17. Drainage arrangements would comprise a pumped system with a rising main to the nearest foul sewer connection at Smithfield Loan while surface water from the site will be managed using a SUDs system which shall drain to the existing surface water pipe leading to Longcarse pump house and pond located to the south of the site before discharging into the River Forth. The site development will limit the discharge rate to the existing culvert equivalent to the greenfield run off rate in accordance with best practice. The SUDs scheme will include swales, filter trenches and permeable paving as well as below ground cellular storage tanks within the carpark areas.
- 3.18. The site is not located within any national or international designated sensitive areas or within a heritage and landscape policy designated site. The site is approximately 300 m from part of the River Forth which is designated as part of the Firth of Forth Special Protection Area (SPA) / Ramsar Site and Site of Special Scientific Interest (SSSI).
- 3.19. There is no recent planning application history associated with the site. Approximately 1.0 Ha (or approx. 15%) Ha of the site was within an application submitted in 2007 for Demolition of Offices and the Erection of Office Building, Joinery Workshop, Distribution Centre and 65 No. Houses, with Associated Roads, Footpaths and Landscaping, South and West of Smithfield Loan. The land within the current site would have accommodated houses. The application was granted by the Planning Committee subject to the conclusion of a Section 75 Obligation. However, the application was withdrawn before the Section 75 was concluded as the applicant's business went into administration.
- 3.20. Consultations
- 3.21. A summary of consultation responses is provided in the Table below. Further reference is made to consultation advice in some of the Service's responses to representations summarised further below.

Consultee	Objection – Yes or No	Main Issues Raised
Transportation Service	No	<ul style="list-style-type: none"> <li data-bbox="798 297 1348 477">• Satisfied development would not adversely affect safe operation of surrounding public road network. Proposed access onto Smithfield Loan acceptable <li data-bbox="798 517 1359 1093">• Subject to approval of details, the proposed provision of a public transport service between site and Alloa Town Centre (Shillinghill) is accepted to address existing inadequate standard of public transport service which could be used to access the site. This service should ideally be maintained for the lifetime of the WBH – <u>Planning Service Comment</u> -this will be regulated by a planning condition which will require the service to be operational before the WBH is first open to the public. <li data-bbox="798 1133 1359 2072">• Active travel infrastructure outwith the site should be upgraded to encourage active travel trips and reduce dependence on car trips. Transportation welcomes the applicant`s commitment to improve active travel infrastructure to connect with the site. Whilst details of the scope of the works will be submitted for approval following an assessment, Transportation consider that the upgrading works should include a route to Alloa Town Centre, the installation of lighting along the existing cycle path to Cambus (NCR76) which passes the site and improving a route from the south side of the A907 to the Claremont area through the Arnsbrae Pleasure Grounds amenity area north of Arnsbrae Roundabout. This currently comprises an unlit unmade path. It could provide an alternative/additional route to the

		<p>existing lit path and toucan crossing located some 110m to the east of the roundabout – <i><u>Planning Service Comment</u> - this will be regulated by a planning condition which will require the submission and approval of the scope of works to deliver suitably safe active travel routes to be completed before the WBH is first open to the public. The applicant has stated that provision of a safe and accessible route from Alloa Town Centre will be the primary focus of the assessment as they consider this is likely to serve the greatest demand and benefit. This route would connect with public transport links and residential areas to the east and south east of Alloa and we consider it to be a priority route.</i></p> <ul style="list-style-type: none"> • The amended proposed traffic management measures on Smithfield Road now acceptable – <i><u>Planning Service Comment</u> -this will be regulated by a planning condition.</i> • The revised proposed parking provision to serve the WBH and school is acceptable and is considered to accord with the relevant parking maxima number based on national guidance. • Accepts proposal that finalised design details of drop off parking facilities in school site and internal footpath/cycle path layout and cycle parking/ storage will be submitted for the approval of the planning authority - <i><u>Planning Service Comment</u> - this will be regulated by a planning condition.</i> • The revised number of EV charging points and ducting to accommodate future points is accepted.
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		<ul style="list-style-type: none"> The submission and agreement of a Travel Plan before the building is first occupied is accepted – <i><u>Planning Service Comment</u> - this will be regulated by a planning condition.</i>
Council's Flooding Officer	No	<ul style="list-style-type: none"> Satisfied that the applicant has demonstrated the buildings are unlikely to be at risk of pluvial flooding under design storm conditions. This includes the risk from existing drainage system to the north west of the site. Notes SEPA's advice that there is no risk posed to the site from the River Forth and that an existing surface water drainage pipe will be relocated within the site so it does not lie under the proposed building. As the pipe is a Council asset, the Transportation Section will have to review and approve the revised design – <i><u>Planning Service Comment</u> -a condition will be attached to require the development to be implemented in accordance with the details submitted showing proposed site and FFL levels and the surface water drainage design.</i>
Environmental Health	No	<ul style="list-style-type: none"> Satisfied with the conclusions of the Air Quality Impact Assessment and Noise Impact Assessments which have been submitted by the applicant. These are considered to demonstrate that the development would not adversely affect air quality standards or result in noise emissions which could result in nuisance to nearby uses including housing and education. External lighting should be designed to reduce the risk of light pollution - <i><u>Planning Service Comment</u> -this will be regulated by a planning condition</i>

		<ul style="list-style-type: none"> A Construction Environmental Management Plan should be required to manage construction activities and hours to reduce the risk of nuisance and disturbance to nearby properties – <u>Planning Service Comment</u> - this will be regulated by a planning condition.
Contaminated Land Team	No	<ul style="list-style-type: none"> The Site Investigation information including a ground gas risk assessment is satisfactory. A planning condition should be attached to require submission and approval of a verification report relating to the satisfactory completion of the ground gas remediation measures and installation of building services as specified before the building is occupied – <u>Planning Service Comment</u> - this will be regulated by a planning condition.
Regional Archaeologist	No	<ul style="list-style-type: none"> Satisfied that there are no known archaeological remains or historic settlements in the vicinity of the proposed development. Therefore, no comments or objections.
SEPA	No	<ul style="list-style-type: none"> Following the submission of additional information by the applicant addressing; the risk of flooding from a drain located to the north west of the site; and confirming an existing culvert under the site will be diverted so no building would be on top of it, SEPA has confirmed it has no objection. SEPA agree with the conclusion of the Flood Risk Assessment that the site is at low risk of flooding from the River Forth.
NatureScot	No	<ul style="list-style-type: none"> Due to the distance between the site and the Firth of Forth Special Protection Area (SPA), the Council is required to consider the effects of the proposal on the qualifying interests of the SPA before the application is consented. The SPA

		<p>is designated for its wintering bird interests and the supporting intertidal habitats. This involves the Council carrying out an Appropriate Assessment (AA) and the process is known as a Habitats Regulations Appraisal (HRA).</p> <ul style="list-style-type: none"> • The development could likely have a significant effect on the pink footed geese interest of the SPA as the development would result in the loss of a field which could provide foraging habitat while noise and lighting during the construction period may cause disturbance. • The Service commissioned an Appropriate Assessment from a suitably qualified person. NatureScot were consulted on the report and confirm they are satisfied with the scope of the assessment and agree with its conclusion that the development will have no adverse impact on the integrity of the SPA and the qualifying species in particular pink footed geese. • NatureScot agree with the recommendations in relation to protection of bats set out in the Preliminary Ecological Appraisal Report. They also support the proposals for habitat creation and biodiversity enhancement within the site shown on the landscape drawings and the proposals for active travel routes within the site and connections to surrounding routes – <i>Planning Service Comment - this will be regulated by a planning condition.</i>
Scottish Water	No	<ul style="list-style-type: none"> • Advise there is sufficient capacity to provide a public water supply. The applicant will have to submit an application to them to obtain a connection.

		<ul style="list-style-type: none"> Advise there is sufficient capacity for a foul only connection to Alloa WWTW. The applicant will have to submit an application to them to obtain a connection.
Sportscotland	No	<ul style="list-style-type: none"> Advise they are not a statutory consultee as the development will not impact on any existing outdoor sports facilities. They note their officers have been involved in the design process for the development.
Scottish Power	N/A	<ul style="list-style-type: none"> No response received to consultation. Consulted as overhead line crosses the southern part of the site – <i>Planning Service Comment - the applicant is in communication with SP regarding diverting the line. The arrangements do not require to be regulated by the planning permission.</i>

3.22. Publicity and Representations

3.23 Extensive pre application consultation and publicity of the application was undertaken in accordance with statutory requirements comprising;

a) Pre-application community consultation as required for Major Developments. This has to be undertaken by the applicant in advance of submitting the planning application. This included;

i) publicity of the pre-application consultation activity by placing public notices in the local newspaper and contacting all Community Councils, Councillors, the local MSP and list members for Mid Scotland and Fife and the local MP.

ii) arranging a meeting on 17/4/24 open to all Community Councils to discuss the proposed development. Representatives from 4 community councils attended.

iii) publishing a consultation website which; outlined the proposals and consultation process; provided an option to download the information boards prepared for the in-person events; and provided an opportunity to leave feedback online. This consultation covered an 8 week period.

iv) the holding of 4 public events in the form of drop-in sessions. Two were held in Alloa Town Hall and two in Tillicoultry Primary School with events at each location in March and April 2024. Members of the Project Design Team were in attendance to answer questions and there were Exhibition Boards on display. Attendees were invited to fill in comments/ questionnaires. The applicant has advised that a significant number of attendees were parents and children who attend the current Lochies School.

b) a description of the above consultation arrangements and summary of the feedback has to be submitted with the planning application within a Pre-Application Consultation Report (PACR). The Report and Appendices dated June 2024 have been submitted and can be viewed on the public case file. The Report includes; at Para 12.1, a broad summary of the responses received to the consultation; in the Table after Para 11.2, a summary of how the applicant's design team has responded to issues raised at the consultation events; and at Para 13.2, a summary of what alterations have been made to the proposed development in response to the community feedback. This comprised; further examination of public transport and other forms of active travel for visitors to the development; provision of information on the proposed building's energy performance; provision of detailed landscaping plans prepared including measures to enhance biodiversity; a detailed flood risk report; and improved design and circulation for users within the 2 buildings.

c) the application was publicised in the Alloa Advertiser for Neighbour Notification reasons and as a Major Development. There were 5 notifiable neighbours who received Notices to Neighbours. All local Councillors, the MP, MSP representing the area and the list MSPs for Mid Scotland and Fife were notified of the application as required by the relevant regulations.

d) the publicity period within which comments could be submitted was extended by the Service beyond the statutory period by an additional 19 days in view of the nature of the development and the amount of supporting information accompanying the application. Following receipt of a number of additional documents in support of the application in October 2024, parties who had submitted representations on the application were notified by the Service about this additional information and a further non statutory publicity period extending for 21 days was provided by the Service to allow the opportunity for comments to be submitted. The documents included information relating to transportation issues, a revised Town Centre First Assessment document, surface water and flood risk documents and an air quality impact assessment.

3.24 In advance of submitting a planning application and outwith the statutory pre-application consultation requirements, the applicant has also undertaken engagement with various stakeholders about the proposed facilities. This took place in 2023 and is summarised in the Table in Appendix 20 of the PACR. This included the Clackmannanshire and Stirling Social Care Partnership, Clackmannanshire Third Sector Interface, Clackmannanshire Sports Council, SCP Health and Improvement Team, Transport and Travel Group and Clackmannanshire Volunteer Manager's Forum.

3.25 Objections and Representations

3.26 A total of 28 objections have been received from individuals and groups and 4 representations which neither support nor object to the application. The list of objectors is provided in **Appendix 1** and the summary of the points of objection are provided in **Appendix 2** of the Report. The objectors include;

i) objections from Alloa Community Council, Muckhart Community Council, Clackmannanshire Third Sector Interface (CTSI), Alloa First and Sauchie Active8.

ii) objections from 23 individuals. 4 parties submitted more than one objection in response to the additional publicity periods.

iii) The majority (16) of objections came from persons living or working in Alloa or based in Alloa, and Alloa CC, while 4 were from addresses in Sauchie, 3 from Tillicoultry, 2 from Alva and 1 from Dollar and Muckhart CC.

3.27 A number of individual objectors and organisations including Alloa Community Council, Muckhart Community Council, Alloa First and Clackmannanshire Third Sector Interface (CTSI) have raised the same main concern about the development not being located in a more central location in or close to the town centre where it would be more accessible to the community including those areas with greater levels of poverty and lower levels of car ownership.

3.28 Objections were received from two individuals but these could not be registered as they were submitted without an address and the senders did not provide one on request by the Service.

4.0 **Planning Assessment**

4.1 Section 25 of the 1997 Act requires that decisions are made in accordance with the development plan unless material considerations indicate otherwise. The Development Plan comprises National Planning Framework 4 (Feb 2023) (NPF4) and the Clackmannanshire Local Development Plan (LDP) adopted in 2015. At the time NPF4 was adopted, the Scottish Government's Chief Planner provided advice on the transitional arrangements to help planning authorities apply it to decision making. The advice noted;

i) existing LDP land allocations will be maintained.

ii) in the event of any incompatibility between a provision of NPF4 and a provision of an LDP, whichever of them is the later in date is to prevail.

iii) NPF4 must be read and applied as a whole. The intent of each of the 33 policies is set out in NPF4 and can be used to guide decision-making. Conflicts between policies are to be expected. Factors for and against development will be weighed up in the balance of planning judgement

iv) when applying Section 25 to reach a decision, application of planning judgement to the circumstances of an individual situation remains essential to all decision making, informed by principles of proportionality and reasonableness.

4.2 The site is located within the settlement boundary of Alloa as defined by the adopted Clackmannanshire Local Development Plan (LDP). It comprises the easternmost part of Business Proposal Site B02 (Alloa West Business Park) which allocates the site, together with a large area of agricultural land to the west and the former marshalling yards and 2 small parcels within the grounds occupied by One School, for development falling within Classes 4 (Business), 5 (General Industrial) and/or 6 (Storage or Distribution). The site is separated from the rest of Proposal Site B02 by the private road which serves Longcarse Farm. Proposal Site B02 extends to approximately 53.5 Ha while the

application site occupies only 6.5 Ha of this total area, and that closest to the existing built-up area. Proposal Site B02 as well as the fields to the south of the site which extend to the farm buildings at Longcarse Farm are within the settlement boundary. The fields to the south are not allocated for development in the LDP. The most relevant policy provisions of the Development Plan are considered to comprise;

4.3 NPF4 Policies

- 1 – Tackling the climate and nature crises
- 2 – Climate mitigation and adaptation
- 3 – Biodiversity
- 4 – Natural places
- 6 – Forestry, woodland and trees
- 9 – Brownfield, vacant and derelict land and empty buildings
- 12 – Zero waste
- 13 – Sustainable transport
- 14 – Design, quality and place
- 15 – Local living and 20 minute neighbourhoods
- 18 – Infrastructure first
- 19 – Heat and cooling
- 20 – Blue and green infrastructure
- 21 – Play, recreation and sport
- 22 – Flood risk and water management
- 23 – Health and safety
- 25 – Community wealth building
- 26 – Business and industry
- 27 – City, town, local and commercial centres
- 31- Culture and creativity

4.4 Clackmannanshire LDP Policies

- SC9 – Developer contributions
- SC10 - Education, community facilities and open spaces
- SC11 – Transport Networks
- SC12 - Access and Transport Requirements
- SC20 – Water and drainage infrastructure and capacity
- EP1 – Strategic Land for Business
- EP4 – Non Employment Generating Uses on Existing or Allocated Business Sites
- EA2 - Habitat Networks and Biodiversity
- EA3 – Protection of Designated Sites and Protected Species
- EA7 – Hedgerows, Trees and TPOs
- EA9 – Managing flood risk
- EA11- Environmental quality
- EA12 – Water environment
- EA25 - The development of brownfield, unstable and contaminated land

4.5 The development is on a site allocated for business or industrial development as defined by the LDP and within the settlement boundary of Alloa. As such the principle of development is considered to be acceptable and contributes to local living and planned compact urban growth notwithstanding the site is greenfield in nature. The design of the building and the arrangements for heating and cooling of the building would minimise energy use and be

compatible with the move towards a decarbonised grid system. This is considered to contribute towards climate change mitigation. The existing wooded areas would be retained largely intact and there would be significant areas of new planting within the site, with native plants which would create a more diverse and valuable habitat and enhance nature networks. Electric vehicle charging facilities would be provided to accord with current regulatory requirements. The application is not considered to be contrary to the objectives of NPF4, Policy 1.

- 4.6 Policy 2 seeks to ensure development will be sited and designed to minimise lifecycle greenhouse gas emissions and be designed to adapt to current and future risks from climate change. It is considered that the proposal would accord with the objectives of this Policy having regard to the proposed design and orientation of the building, which is intended to meet Passivhaus standards which would deliver a high level of energy efficiency, reduce energy consumption for heating and cooling and minimise environmental emissions. The assessment of flood risk has taken into account possible impacts associated with the effects of climate change. The application is not considered to be contrary to the objectives of NPF4 Policy 2.
- 4.7 Policy 3 and EA2 seek to protect biodiversity and deliver positive effects from development and strengthen nature networks. Policy 3 b) states that proposals for major development will only be supported where they will conserve, restore and enhance biodiversity including future management. It sets out 5 criteria which proposals shall meet. These comprise;
- i) The proposal is based on an understanding of the existing ecological characteristics of the site.
 - ii) Nature based solutions have been used where feasible
 - iii) Any negative effects should be identified and fully mitigated
 - iv) Significant biodiversity enhancements are provided
 - v) Local community benefits of the biodiversity have been considered.

The majority of the site is arable farmland which has a relatively low biodiversity value. The areas with the current greatest biodiversity value comprise the tree belt along the east boundary and the wooded embankment along the north boundary of the site. The proposed layout has been designed to minimise impact on these habitats and the majority of the trees and planting within these areas will be retained. The trees that would be removed are only to accommodate the access to the site and the archery range or because they are in a poor condition. A number of reports have been submitted to help assess the potential impact of the development on the natural habitat interest within or adjacent to the site. These comprise; an Arboricultural Survey (June 24), Preliminary Ecological Appraisal Report (July 24), a Tree Retention and Protection Plan (June 24), a Tree Removal Plan (June 24), Landscape Masterplan (June 24) and a Landscape Design Report (June 24). The above reports ensure there is an adequate understanding of the ecological value of the site. As described in Para 3.16 above, the development would create significant areas (circa 2.3 Ha) of new parkland and landscaping designed to enhance the biodiversity value of the site and complement the established

nature networks in the area as well as provide spaces to enhance the well-being of visitors and for recreational activity. The proposed plans are considered to comprise nature based solutions as they would protect and restore natural ecosystems and provide both human well-being and biodiversity benefits. The applicant has advised that the project has been enrolled in the “Building with Nature” accreditation process which is a UK wide accreditation standard to deliver best practice in green and blue infrastructure. The proposed layout and landscape design has taken account of feedback during the pre application consultation process to deliver benefits to users of the WBH and school. Our assessment of the above reports and associated information concludes that; the habitat and biodiversity value of the site is currently relatively low; the survey information indicated that there was no evidence of protected species within the site apart from possible bat roosts within some of the trees; the implementation of the recommendations in the Ecological Appraisal would mitigate any potential impacts on bats; the proposed landscape areas comprising parkland and planting would deliver significant biodiversity enhancement of the site which would complement and strengthen habitat connectivity in the area; and nature networks have been designed to provide community benefits as publicly accessible open space. It is concluded that the application would satisfy the requirements of Policy 3 b) and will not be contrary to Policies 3 and EA2.

- 4.8 Policies 4 and EA3 seek to protect important natural assets. Proposals that are likely to have a significant effect on an SPA are required to be subject to “Appropriate Assessment”. Proposals which may impact on SPAs or SSSIs will only be supported where the overall integrity of the designated area will not be significantly impacted. The Service has commissioned an Appropriate Assessment which was undertaken by a suitably qualified person. The assessment concluded that the development will have no adverse impact on the integrity of the Firth of Forth SPA and qualifying species (and the associated Firth of Forth RAMSAR site and SSSI) subject to the mitigation during construction works of installing screening along the west and south boundary of the site primarily to minimise visual disturbance. This will be regulated by a planning condition. NatureScot has no objection and has stated that it supports the conclusions of the Assessment. The Ecological Appraisal has also demonstrated that subject to the mitigation measures for bats, the development would not adversely affect any protected species or the nearest candidate Local Nature Conservation Sites located to the west. The information has demonstrated that the proposals would not adversely affect natural assets subject to the proposed mitigation measures which will be regulated by planning conditions. The application is not considered to be contrary to Policies 4 and EA3.
- 4.9 Policies 6 and EA7 support the protection and expansion of woodland tree cover. Proposals which result in the loss of ancient woodland or adversely affect native woodland or fragment woodland habitats will not be supported. Where trees or hedges have to be removed, proposals for replacement planting will be required. The development would not affect ancient or native woodland. The existing areas of woodland would be retained and would not be fragmented. The proposed landscaping masterplan shows substantial tree and hedgerow planting which will strengthen the existing woodland habitats and create new habitats including within a linear park which would strengthen the nature networks in the area. This will significantly outweigh the number of

trees which have to be felled to accommodate the development and enhance the amenity and biodiversity value of the site. The application is not considered to be contrary to Policies 6 and EA7.

4.10 Policy 12 states that development which will generate waste when operational shall outline how this will be managed to maximise waste reduction and separate waste at source. The development will include measures to separate waste and store it within the site which will enable recycling. The application is not considered to be contrary to Policy 12.

4.11 Policy 13 and LDP Policies SC11 and SC12 relate to transportation issues. Policies 13 and SC12 seek to facilitate development which will prioritise sustainable travel modes and reduce the need to travel unsustainably. It is acknowledged that due to the needs of the pupils who would attend the ASN school and that its catchment covers the whole of the Council area, pupils would travel to and from school by vehicle and not by active travel or public transport, wherever it was located. Therefore, our assessment of Policy 13 has focussed on the proposed WBH element of the development, where there is greater scope for travel by a variety of modes. The Policy contains a number of requirements most of which would apply to the proposed development. These are summarised below;

a) Policy 13 a) supports proposals which will provide or enhance active travel and public transport infrastructure and provide electric vehicle charging infrastructure. The development would deliver enhanced active travel routes within and outwith the site and a public transport bus service would be introduced to serve the WBH which would connect with the existing main bus hub in Alloa Town Centre. Electric vehicle charging infrastructure would be installed in line with current regulatory requirements. It is considered that based on these factors, this part of the Policy would support the application.

b) Policy 13 b) provides support where it can be demonstrated that the transport requirements have been considered in line with sustainable travel and investment hierarchies. The sustainable travel hierarchy is to be used in decision making to promote walking, wheeling, cycling public and shared transport in preference to single occupancy private car use for the movement of people. The Policy wording highlights a number of criteria which proposals should meet to support the above approach. The relevant ones are considered below;

- i) The development provides direct, easy, segregated and safe links to local facilities via walking and cycling before occupation
- ii) Will be accessible by public transport
- iii) Provide vehicle and cycle charging points in alignment with building standards
- iv) Supply safe and secure and convenient cycle parking
- v) Incorporate safety measures including safe road crossing points and reducing the number and speed of vehicles

- vi) Have taken into account the transport needs of diverse groups
- vii) Adequately mitigate any adverse impacts on public access routes.

Our assessment of the application has been undertaken having regard to the sustainable travel hierarchy and the need to promote sustainable travel options to serve the WBH. This is driven by a number of factors, including; to ensure the WBH is accessible to as many people as possible, including those without access to a car or unable to drive a car; to promote active travel to deliver health and well-being benefits; to reduce vehicle movements on the road network; and to reduce climate change emissions. The consultation advice from Transportation also reflects this approach. It is acknowledged that the site location is on the edge of Alloa and this would result in lengthier active travel trips than a more central location. The application however, must be assessed and determined on its individual merits and not on the merits of any other alternative hypothetical proposal or site.

Whilst there is a public transport service which passes the site (C1 town service), its low service frequency, restricted operating hours and routing would mean it is unlikely to provide an attractive or practicable service for visitors or staff using the WBH. Following negotiations, the applicant has agreed to provide a public transport bus service between the site and Alloa Town Centre at a frequency to be agreed by the Planning and Transportation Services. It is considered that the provision of this service would significantly mitigate the current deficiencies in public transport provision and ensure the WBH can be accessed via public transport. This is considered to accord with the requirements of point ii) above. While the specification of the service including the frequency and hours have still to be agreed, these details would be regulated by a suitably worded suspensive condition which would also require the service to be introduced before the first use of the WBH. Demand for the service would require to be monitored, and the duration of the service contract should be not less than 5 years (which reflects the normal contract period for bus service delivery).

The proposed development would integrate with the established footpath network which effectively surrounds the site. The proposed linear park would create an attractive segregated active travel route as an alternative to the farm access road. A segregated path would also be provided to connect with the path leading to Cambus. Following negotiations, the applicant has agreed to deliver upgraded active travel infrastructure outwith the site to encourage active travel trips to and from the site. The site is relatively well served by active travel routes and sits next to the NCR 76 and paths which connect with Caledonia Road in Alloa however, the existing routes, particularly towards Alloa Town centre require improvement so they would be suitably attractive, safe and accessible for potential users. The precise details of these would be informed by the applicant undertaking an Active Travel and Accessibility Audit with the findings being submitted for the approval of the Planning Service in consultation with Transportation. As the

works would affect public roads or paths maintained by the Council, the proposals would be regulated by a suitably worded planning condition which would also require their completion before the first use of the WBH. Subject to the conditions, it is considered that the proposal would accord with the requirements of point i) above. The proposals are also considered to satisfy the requirements set out in Points iii) to vi) above. There are proposals for a controlled crossing on Smithfield Loan close to the site entrance, while the amended proposals are considered to have ensured the needs of diverse groups have been taken into account. The development would not adversely affect the existing footpath network adjoining or within the site which comprise 4 Core Paths including part of NCR 76. The proposals would integrate with the paths and provide a segregated shared path as an alternative to using Core Path 21 which also serves as a vehicle access to Longcarse Farm. The proposal is therefore considered to accord with Point vii) above and the associated requirements of LDP Policy SC11 in relation to core paths.

- c) A Transport Assessment has been submitted as required by Policy 13 c). Transportation is satisfied that it demonstrates that the development would not adversely affect the capacity or safety of the surrounding road network. Measures to support travel in accordance with the sustainable travel hierarchy have been discussed in Point b) above.
- d) Policy 13 d) states that proposals for significant travel generating uses will not be supported in locations which would increase reliance on the private car. It is considered that there are tensions between this part of the Policy and the proposed WBH as the use would generate private car trips. However, the degree of tension would be mitigated by the following factors;
 - i) The site is also located next to a main active travel route which is part of the national cycle route networks and which connects with similar routes leading to Tullibody, Menstrie, Alloa Town Centre and Railway Station and to Tillicoultry. The negotiations have secured the provision of upgraded active travel infrastructure outwith the site including a key route from Alloa Town Centre area to encourage active travel trips to and from the site as well as the provision of a public transport service between the site and Alloa Town Centre (to connect with the bus interchange at Shillinghill). These measures are supported by Transportation and it is considered would reduce reliance on the private car and increase accessibility for those without access to a private car. The impact of the mitigation is difficult to quantify but its provision would create accessible and attractive alternatives to the private car and address the concerns about the proposal as originally submitted which could result in a largely car based development.
 - ii) The WBH would serve the whole of Clackmannanshire and a proportion of visitors would have to travel by private car wherever the WBH was located. The school catchment also covers the whole of Clackmannanshire.

- iii) Experience of facilities elsewhere which provide similar leisure and activity services indicates that a proportion of customers will use the private car due to a number of factors notwithstanding the location or availability of alternative more sustainable means of transport.
 - iv) The Town Centre First Assessment has established that there are no alternative locations which could accommodate the proposed development that would be more accessible to public transport and active travel routes.
- e) Policy 13 f) requires developments which will generate significant trips to be accompanied by a Travel Plan to allow effective monitoring of targets to encourage sustainable travel. A Travel Plan would be required for the WBH and the school and this will be regulated by a planning condition. This would satisfy Policy 13 f).
- f) It is necessary to assess the proposal against all of the relevant parts of Policy 13 and consider which parts it would accord with and which it would not and weigh up whether the application is contrary to the Policy or not. Of the 5 relevant parts, the development would clearly satisfy 4 of them whilst there is some tension with Policy 13 d). NPF4 states that the policy intent of Policy 13 is to encourage, promote and facilitate development that prioritises sustainable modes of transport over the private car and reduces the need to travel unsustainably. The Policy outcomes are expected to deliver; investment in transport infrastructure to support connectivity and local living; deliver more, better and safer and inclusive sustainable and active travel opportunities; and result in development which is in a location which supports sustainable travel. On balance, and subject to the proposed investment in public transport connections and upgrade of active travel infrastructure to provide sustainable travel options, it is considered that the application would, overall, meet the Policy tests and therefore would not be contrary to Policy 13. Similarly, the application is not considered to be contrary to LDP Policies SC11 and SC12.

4.12 Policy 14 seeks to ensure developments are designed to high standards and are consistent with the 6 qualities of successful places set out in the Policy and in Designing Places and Designing Streets guidance. The application has been supported by a Design and Access Statement which sets out how the design and layout has responded to the nature and character of the site, as well as addressing building design standards, accessibility and landscape setting. The proposed building design, open space, footpath links and landscaping are considered to deliver a high standard of design which would also be built using sustainable construction methods. The proposed single building design considers the function and safety of both the WBH and ASN school uses and provides opportunities for facilities within each element to be used by the community and pupils at appropriate times thereby both parts complement each other. The proposed parks, well-being garden and school grounds would provide high quality spaces which would encourage recreational, social and well-being activity and enhance the existing recreational opportunities associated with the footpath network in the vicinity of the site. The proposal is considered to be consistent with all 6 qualities which define a successful place, namely; healthy, pleasant, connected, distinctive, sustainable and adaptable, and the requirements of Policy 14.

- 4.13 Policy 15 supports the delivery of development which accords with the principle of local living and 20 minute neighbourhoods. NPF4 defines this as a flexible approach to assessing places against the concept of local living and a method to achieve connected and often compact neighbourhoods which are designed so people can meet the majority of their daily needs within a reasonable distance of their home. The WBH and school are intended to serve the whole of Clackmannanshire and therefore neither would serve a specific neighbourhood. The site is within the settlement boundary and while its location on the edge of Alloa would not maximise its accessibility within 10 minutes active travel for residents in Alloa, it will serve the whole of the Council area. Policy 15 states that proposals should contribute to local living and consideration will be given to existing settlement pattern, the level and quality of interconnectivity with the surrounding area including access to; local public transport and high quality active travel links; and residential, employment and social and recreational uses. The proposal would include measures within and outwith the site to connect the development with the surrounding area, including a bus service to Alloa Town Centre and upgrading of active travel links. These measures would help deliver connectivity with the main public transport node and communities in Alloa and the surrounding area as required by Policy 15. There are residential areas nearby which could access the development using sustainable transport options. Furthermore, it is considered that a degree of flexibility can be applied to the concept of 20 minute neighbourhoods in this instance given the development would serve all the communities and residents in Clackmannanshire. Given the above factors, it is considered that the application would not be contrary to the requirements of Policy 15.
- 4.14 Policies 18 and SC9 seek to ensure development is served by suitable infrastructure and where development has an impact on infrastructure capacity or the need for mitigation measures, this is provided by developers. Policy 18 supports proposals which provide infrastructure in line with that necessary in the LDP and only provides support to those where it can be demonstrated that provision will be made to address any impacts on infrastructure. Supplementary Guidance 1 – Developer Contributions approved as part of the LDP also provides guidance on the approach and process for agreeing contributions. The assessment of the application has identified the need for contributions to address impacts associated with providing adequate public transport provision, active travel infrastructure and road and pedestrian safety measures on Smithfield Loan. In line with the guidance in SG1 a contribution towards public art will be provided. The SG does not quantify an amount or scale to be provided but states it should be proportionate to the nature of the development. The developer contributions will be regulated by suitably worded planning conditions. The application is not considered to be contrary to Policies 18 and SC9.
- 4.15 Policy 19 encourages development which supports decarbonised solutions to heating and cooling buildings. The Policy states that buildings that will be occupied by people will be supported where they are designed to promote sustainable temperature management such as passive solutions. Major developments that generate surplus heat should demonstrate how energy recovered will be used to produce heat or energy. The building would be built to Passivhaus standards and energy demand would be met by electric technology which is compatible with a decarbonised grid system. The

ventilation system will include mechanical heat recovery which would recover heat from the atmosphere within the building. The application is not considered to be contrary to Policy 19.

- 4.16 Policy 20 seeks to protect and enhance blue and green infrastructure. The Policy states that development should not result in fragmentation or net loss of such infrastructure while proposals which deliver new or enhanced infrastructure will be supported. Management and maintenance plans shall be provided to ensure their long term delivery. As summarised in Paras 4.7 and 4.8 above, the proposals will protect and significantly enhance the quality and extent of green infrastructure on the site providing a range of open spaces, habitats and an area of green roof on the building. Planning conditions will be attached to require their implementation and approve the arrangements for maintenance. The application is considered to accord with Policy 20.
- 4.17 Policies 21 and SC10 support development which will facilitate spaces and opportunities for play, recreation and sport. Proposals used by children and young people shall incorporate well designed and good quality provision for play, recreation and relaxation. The Policy sets out a number of criteria which play provision should meet and confirm the arrangements and parties responsible for the upkeep of facilities. This will be regulated by a planning condition. The WBH will provide a range of sport and recreational facilities including a swimming pool, teaching pool and splash pool as well as spaces for sport and exercise and other activities as summarised in Para 3.8 above. The swimming facilities would replace those that were within the former Leisure Bowl which were last available in March 2020. In the intervening period, the closest access to comparable facilities has been at The Peak in Stirling. The WBH would also cater for a range of other sports and activities as well as a fitness suite and gym. The development would provide a range of outdoor sport and play opportunities including a 5 a side pitch, archery range and children's play equipment, outdoor gym equipment and attractive amenity and social spaces. This will be incorporated within a well-being park, linear park and community garden space. These will be designed to be inclusive, provide a range of experiences, be suitable to different ages of children, be stimulating and incorporate landscaping. The school will also incorporate high quality external spaces for play, learning and relaxation. The scale, design standard, range and accessibility of the sport, play and public spaces proposed are considered to achieve the vision for the project which is to deliver an inclusive, accessible and inspiring facility that will improve the quality of life for communities across Clackmannanshire through their physical and mental health. It will also address the absence of facilities since the Leisure Bowl closed almost 5 years ago. The application is considered to accord with the terms and objectives of Policies 21 and SC10.
- 4.18 Policies 22 and EA9 seek to ensure development is not at an unacceptable risk of flooding or will not result in an unacceptable increase in flood risk elsewhere. Policies EA12 and SC20 require development to; protect and where possible enhance the water environment; manage surface water by SUDs which should integrate with and where possible enhance blue - green infrastructure; and provide a Drainage Impact Assessment where appropriate. A Flood Risk Assessment and Drainage Impact Assessment have been undertaken. SEPA and the Council's Flooding Officer have no objections to

the development on flood risk grounds and have not objected to the conclusions of the Reports namely;

- The site is out with the risk of coastal flood risk or future medium coastal flood risk.
- The lowest level within the site is 6.76m OD which is out with the risk of fluvial or future medium fluvial flood risk. Finished floor levels will be elevated above surrounding ground levels.
- The development area is outwith the future functional flood plain.
- The site is not at risk of isolated groundwater rise occurring.
- The site is not at risk of flooding from surface water sources. Site levels shall direct any overland flow from flood waters away from buildings.
- The site is not at risk of flooding as a result of a failure in local drainage infrastructure.
- Will not materially increase the risk of flooding elsewhere.
- Emergency vehicular and pedestrian access will remain available to Smithfield Loan during the design storm flood event.

The application is considered to accord with the requirements of Policies 22, EA9, EA12 and SC20.

- 4.19 Policies 23 and EA11 seek to ensure development will not result in environmental harm to people or places and to facilitate development which improves health and well-being. Policy 23 states that proposals that will have positive effects on health or deliver health and social care facilities will be supported. The WBH will provide a range of facilities related to physical and mental health well-being including sports facilities, NHS health based activity as well as community group meetings and social activities. Policy 23 also states that proposals which are likely to have significant effects on air quality or raise unacceptable noise issues will not be supported. Environmental Health is satisfied that the development would not result in such adverse impacts having reviewed the Noise Assessment and Air Quality Assessment submitted with the application. The development is considered to be compatible with the surrounding area and is not considered to be contrary to Policies 23 and EA11.
- 4.20 Policies 9 and EA25 require proposals to demonstrate that land can be made safe and suitable for development where it may be contaminated or unstable. The Contaminated Land Team has no objection and is satisfied that subject to the completion of the measures set out there would be no significant risk from ground conditions. A condition will be attached to require submission and approval of the required verification report before the building is occupied. Policy 9 also states that proposals on greenfield sites will not be supported unless the site is allocated for development in the LDP. The site has been allocated for development in the adopted LDP as part of Business Proposal Site B02. The site is a relatively small percentage of the total area of the allocated site (approx. 12%). Our assessment of Policy 27 below has also had

regard to the availability of potential brownfield sites and it is concluded that there would not be any suitable brownfield site which could accommodate the proposed development. It is therefore concluded that the application would not be contrary to Policies 9 and EA25.

- 4.21 Policy 25 relates to community wealth building. The Policy does not impose any requirement on proposals to contribute to this approach to local economic development. It does state that proposals which contribute to community wealth building strategies or local economic priorities will be supported. The proposed WBH facilities will contribute to creating a more attractive and healthy environment within Clackmannanshire which in turn is expected to improve the well-being and capabilities of people; helping to tackle poverty and inequality. The applicant has also advised that project has targeted delivery of significant social and local economic value as part of the project and a Social Impact Execution Plan has been agreed. This includes a target of 60% of construction spend in the local hub East Central Territory, employment for at least 30 local people to support priority groups including long term unemployed to support them into sustainable employment, the offer of apprenticeships, the construction of the development will deliver social and local economic benefits to the local area as well as provision of business advice to local businesses. It is considered that the project would contribute to community wealth building as described in the wording of Policy 25 a).
- 4.22 Policy 26 and LDP Policies EP1 and EP4 relate to business and industry issues. These are discussed below;
- i) Policy EP1 relates to 4 sites allocated as Strategic Land for Business in the LDP, which the land at Alloa West is one (comprising Business Proposal Site B02). The Policy does not preclude other types of development taking place but states that proposals for business use not fully in accordance with the Development Requirements identified in the Site Schedule in the LDP will only be supported where they are compatible with and would not prejudice the strategic use of the site, and would increase the number of jobs in Clackmannanshire. The Schedule identifies the land as suitable for Business, General Industrial or Storage or Distribution uses. Having regard to; the proposed layout; the access arrangements and potential future access to the rest of the land within Business Proposal Site B02; the advice from Environmental Health which does not identify any significant issues in relation to noise impacts or compatibility with existing and future development; and that the development would create employment for 67 FTE staff and a significant number (at least 50) of part-time and casual staff at the WBH; it is concluded that the application would not prejudice the strategic use of Site B02 and would not be contrary to Policy EP1.
 - ii) Policy EP4 sets out criteria for considering proposals for non employment generating uses on existing or allocated business sites. Proposals will not normally be supported unless one or more of the 5 criteria listed in the Policy can be met. While the completed development would generate employment, given the proposed uses fall within Classes 10 and 11 rather than 4, 5 or 6, the Policy requirements have been applied to the application. Our assessment has concluded that the application would meet more than one of the criteria which would support an exception to the policy position, those being;

- The site has been allocated for business development for several years but this has not resulted in suitable offers for business development. Permission for a mixed use development on part of the land was granted in 2007 but was never implemented and no alternative proposals have come forward since. Given the scale of available business land on adjacent land and evidence of little demand for business/ industrial development within the Alloa West business area (where land and buildings proposed for business use have been occupied by education / children’s nursery uses), the use of the site for business development does not appear to be viable. The proposed development is considered to be compatible with existing or proposed business development in the vicinity of the site, including within the remainder of the land in Proposal Site B02. The assessment has concluded that the proposed uses would be compatible with business and industrial activities on land to the east of the site. The development would not prejudice the availability of land on the remainder of the allocated site for business development and the land could be accessed from the public road network. The application site is relatively self contained and enclosed by the wooded area to the east and north and the access road to Longcarse to the west. Environmental Health has not raised any concern about potential impacts from future development to the west.
- Transportation has no objections, and the proposed development would not appear to result in any negative transport impacts.

4.23 Policy 26 sets out criteria where proposal will be supported but the policy wording does not make any reference to circumstances where proposals are for non business and industry uses on business land, unlike Policy ED4. The Policy does provide support for other employment uses where they would not prejudice the primary function of the area and are compatible with the character of the area. It also requires proposals to take account of the potential impact on surrounding residential amenity, sensitive uses and the natural environment. These factors have been satisfactorily assessed and addressed by the application. The application is not considered to be contrary to Policy 26. In reviewing compatibility with the relevant Business policies, it is considered that while the site is allocated for Business and Industry uses, the application would satisfy the exceptional circumstances set out in Policies EP1 and EP4. Furthermore, regard has to be taken of the advice issued by the Scottish Government’s Chief Planner that in the event of any incompatibility between a provision of NPF4 and a provision of an LDP, whichever of them is the later in date is to prevail. Therefore Policy 26 prevails and the application is not considered to be contrary to this Policy.

4.24 Policy 27 seeks to promote and facilitate development in city and town centres recognising they are a national asset and required application of the Town Centre First approach. NPF4 defines this as asking “government, the public sector, communities and businesses put the health of town centres at the heart of decision making. It seeks to deliver the best local outcomes, align policies and target resources to priorities town centre sites, encouraging vibrancy, equality and diversity”. It highlights a policy outcome should be development being directed to the most sustainable locations that are accessible from a range of sustainable transport modes and provide

communities with easy access to services and recreational opportunities they need. The Policy states that uses which will generate significant footfall, which includes leisure, community, sport and public buildings such as education will not be supported outwith existing town centres unless a Town Centre First Assessment (TCFA) has been provided and it demonstrates;

- The scale of development cannot reasonably be altered or reduced to allow it to be accommodated in a centre
- All centre and edge of centre options have been sequentially assessed and discounted as being unsuitable or unavailable
- The impacts on existing centres have been thoroughly assessed and there will be no significant adverse effect on the vitality or viability of the centres.

4.25 There is advice in the text of Policy 27 on what a TCFA should cover and it advises that it should be applied flexibly and realistically for community, education health and social care and sport and leisure facilities so they are easily accessible to the communities they are intended to serve. The applicant has submitted a TCFA in support of the application and submitted further information in response to comments from the Planning Service about the scope of the original document.

4.26 The Service consider that the scope of the revised TCFA is adequate having regard to the advice contained in Policy 27. Our assessment of the 3 criteria set out in the Policy highlighted above is summarised below.

i) The scale of development cannot reasonably be altered or reduced to allow it to be accommodated in a centre – when applying the tests, it was considered that the scale and form of the development was the key criteria which then helped address the other 2. The proposed development comprises a single building which contains both a WBH and an ASN school. The school has to be single storey which affects the size of its footprint. The proposals also include outdoor spaces for recreation and well-being as well as outdoor play and learning as part of the school. These areas are described in Paras 3.7, 3.8 and 3.16 above. The applicant has stated that the scale of the development cannot be reduced or altered to be accommodated in a smaller site, primarily for the following reasons;

- The vision of the project is to deliver an inclusive, integrated, accessible and inspiring facility combining both education and well-being to bring people and communities together to improve educational outcomes, health and well-being and the quality of life of users of the building. The vision is for a transformational facility where a range of health and wellness services as well as sport and recreation will be provided shared across the WBH and school. For example, the inclusion of a school for learners with severe and complex needs alongside a WBH allows for schools specialist facilities and staff. The dual use will enable pupils to access community medical support on site as well as the services being offered to the wider community. This

approach is supported by partners in the project including the NHS and allied health professionals. Any reduction in scale or separation of the buildings would significantly compromise the design intentions and project brief.

- The external areas are also fundamental to the objectives of the vision, providing extensive, attractive, accessible and free to use outdoor spaces. There was a strong focus on external spaces having equal value to the built asset from community consultation. The parks and school playground area extend to approximately 2.3 Ha while the other areas of woodland and planting within the proposal would extend to approximately 0.8 Ha. Therefore approximately 50% of the site area comprises open space and landscaping. Having regard to the proposed uses and design of the outdoor areas, it is considered that these could not effectively be provided separately from the WBH without significantly reducing the value of the project and vision.
- The integrated facility has a significant effect on the financial sustainability and viability of project and the ability to deliver the school and WBH. The integrated provision of education and care across the 2 uses aligns with the Scottish Government's multipurpose approach which was a factor in securing funding from the Learning Estate Investment Programme. The campus approach also ensures economies of scale from both a construction and operational budget perspective which will help long term viability. The campus approach on a large enough site allows more desirable or optimal features to be provided as it is less costly to build outwards than upwards. The applicant has advised that the approach is informed by the Council's Target Operating Model which promotes operational efficiency, collaborative service delivery and innovation in public services. It is considered that benefits associated with funding and securing long term financial sustainability are material planning considerations on the basis that this contributes to the delivery of the proposed development.

Planning applications have to be determined on their individual merits and little or no weight can be attributed to what a design could have included when the application is being determined. Our assessment of this criterion, including the factors set out in the bullet points above, is that the scale of the development could not be altered or reduced without creating significant detrimental impacts on the effective delivery of the vision for the project in terms of the range of facilities, services and elements and the financial viability and sustainability of the project. On balance, the consequences of requiring changes which would likely require separate sites for the WBH and school, and the likely loss of much of the proposed external spaces would not be reasonable. This criterion has been met.

- ii) All centre and edge of centre options have been sequentially assessed and discounted as being unsuitable or unavailable – Having regard to the conclusion reached on the preceding criterion, an assessment has been undertaken of other potential town centre or edge of centre sites following the sequential approach. The TCFA document does consider the suitability or availability of alternative sequentially more suitable sites including the vacant site of the former Leisure Bowl to the south of Parkway and sites comprising the Asda supermarket and Tesco supermarkets in Alloa Town Centre. While the document does not consider alternative design solutions which could reduce the building footprints and simply applies the outline of the proposed building footprint and site area, and it does not identify any other edge of centre sites, these are not considered to outweigh or undermine the following findings of our assessment;
- In terms of the network of town centres a focus on Alloa is considered reasonable given the absence of suitable or available sites elsewhere.
 - The only sequentially preferable site to Alloa West which is available is the edge of town centre site comprising the former Leisure Bowl and Council owned open space to the east. However, this is considered unsuitable to accommodate the integrated campus approach discussed in the preceding point. The former Leisure Bowl site extends to approximately 1.1 Ha with around a further 0.5 Ha of potentially useable space on land to the east also owned by the Council. By comparison the proposed building footprint is 0.9 Ha and the proposed parkland and garden space approximately 1.7 Ha. This figure does not include the area of playground for the school (0.6Ha) or any space for parking or servicing of the building. Even with a site specific building design the site would be constrained to deliver the proposed internal and external elements.
 - On the basis that the scale of the proposed development could not reasonably be altered or reduced sufficiently to be accommodated on the former Leisure Bowl site, it is considered that this site would be unsuitable for the proposed development. It is considered that there are no other suitable or available sites which would be sequentially preferable to the proposed site. The second criterion has been met.
- iii) The impacts on existing centres have been thoroughly assessed and there will be no significant adverse effect on the vitality or viability of the centres. – our assessment of this criterion has reached the following conclusions;
- The proposed development is not considered to displace or adversely affect existing sport, leisure or well-being uses or facilities within Alloa Town Centre or other centres in the area. The Leisure Bowl has been closed for nearly 5 years. Consequently, locating the development at Alloa West does not involve relocating an existing facility from the town centre and is

not considered to result in a significant adverse impact on the vitality or viability of the town centre as it would not draw existing activity away from the town centre. While it can be argued that a location on the edge of the town centre could have increased footfall and spending within the town centre, this is a different point and not part of the test in the criterion.

- The applicant has also advised that the proposed facility will not displace activity from existing locations around the Council area including those within town centre locations. The model is to create a network which will link with and complement existing provision to increase levels of activity, health and well-being in the area.
- It is considered that the third criterion has been satisfactorily met.

4.27 Further to Para 4.25 above, our conclusions on the scope of the TCFA are summarised below;

- The document has satisfactorily identified and considered the relationship between the development and the network of centres.
- It has identified the potential economic impact of the development. Once operating, the WBH will create approximately 35 FTE jobs and over 50 casual or part time positions. The school would employ around 10 additional members of staff compared to the existing Lochies school mainly due to the increase in school capacity. The development is not considered to result in any displacement or net loss of jobs from the town centre as there is no similar facility within the town centre following the closure of the Leisure Bowl in 2020.
- The TCFA has considered supply chains and opportunities for local suppliers. The applicant has confirmed that it has already agreed a Social Impact Execution Plan which will deliver specific targets and including the number of local jobs created, support into work assistance provided, creation of new apprenticeships, a proportion of costs to be spent in the local supply chain.
- The environmental impact of transporting staff and visitors has been considered. An air quality impact assessment has been submitted which concludes that the development would not have any significant impact on air quality. A public transport service would be provided between the site and Alloa Town Centre and upgraded active travel links would be provided. The traffic expected to be generated by the development is not considered to result in significant adverse environmental impacts.

4.28 Our assessment of the application against the requirements of Policy 27 summarised above has concluded that, as set out in para 4.27, the scope of the TCFA is adequate, and as set out in Para 4.26, the application would sufficiently satisfy the 3 criteria set out in the Policy which would provide Policy support for the development at the proposed location. Subject to the

proposed mitigation, the development would be accessible by a range of sustainable transport modes and overall, the development would enjoy an acceptable level of accessibility to serve the Clackmannanshire area. Consequently, the application is not considered to be contrary to Policy 27 although it is recognised that it would not result in development in a town centre. It should be noted that while the TCFA refers to an Options Appraisal previously undertaken by the Council which considered the current site and the former Leisure Bowl site, this process and its outcome is not a material planning consideration in the determination of this application. The planning assessment has been undertaken having regard to the relevant provisions of the development plan.

- 4.29 Policy 31 a) states that proposals that involve the creation of new public open spaces will make provision for public art. The applicant has confirmed that the development will include provision of public art and this will be regulated by a planning condition to require a strategy to be submitted for approval. This would accord with the relevant requirements of Policy 31.
- 4.30 In summary, some tensions have been identified with the requirements of Policy 13 d) and Policy ED 4. In relation to Policy 13, as discussed in Para 4.11 there are mitigating factors, and balancing all of the tests in the Policy, the application is not considered to be contrary to the Policy. In relation to Policy ED 4, this Policy is older than NPF4 Policy 26 which therefore prevails and the proposal is not contrary to Policy 26. While the application would not deliver development in or on the edge of Alloa town centre or any other town centre as supported by Policy 27, the application has been assessed against the tests set out in the Policy and it is concluded that an exception has been justified which would provide policy support for the proposed out of centre site. The site is still considered to be a sufficiently sustainable location to serve the community and be accessible by sustainable modes of transport. Taking the 20 relevant Policies in NPF4 and 14 Policies in the LDP and applying them as a whole, it is considered that there would not be any significant conflicts either individually or collectively which would outweigh the level of Policy support and consequently, subject to the proposed conditions, the application would not be contrary to the development plan.

5.0 Other Material Considerations

- 5.1 A number of other material considerations have been identified which have also informed the assessment of the application. These are summarised below;
- 5.2 There have been no objections to the application from consultees and subject to the proposed conditions, issues they have raised will be satisfactorily addressed. The responses would not justify withholding permission.
- 5.3 The objections and representations have been summarised and discussed in Appendix 2 of the report. A number of the organisations and individuals raised concerns about the proposed location of the development, and why it should be located in or close to Alloa Town Centre. These concerns reflected aims set out in NPF4 and other plans which the Council has published or are partners in including the LOIP and Sport and Active Living Framework. Following careful consideration of the concerns, the information submitted in

support of the application, the advice from consultees, the materiality of the points in relation to the statutory planning application process, it is considered that the application as submitted is not contrary to the provisions and relevant Policies of the development plan. Consequently, and subject to the proposed mitigation, the objections are not considered to outweigh the development plan support and provide sufficient grounds to withhold permission.

- 5.3 The development is considered to be compatible with neighbouring land uses and development would not adversely affect the established standards of amenity in the area. The development is not considered to prejudice future business development on the remainder of Business Proposal Site B02.
- 5.4 The proposed development is considered to accord with the relevant advice published in the Council's Supplementary Guidance relating to; 1 – Developer Contributions; 3 - Placemaking; 4 - Water; 6 - Green Infrastructure; and 7 - Energy Efficiency and Low Carbon Development.
- 5.5 The design has been informed by collaborative working between the Council, Sportscotland, governing bodies, equalities groups, NHS teams and other stakeholders which is considered consistent with the Place Principle. The facilities which will provide accessible holistic health and well-being services through partnership working with health partners, third sector organisations and council services will also encourage individuals to adopt and maintain healthy lifestyles.
- 5.6 The development is expected to deliver significant educational, health and well-being benefits to the local community including the reinstatement of public swimming facilities in the Clackmannanshire area which have not been available since 2020. It is designed to create a social hub for all ages and a place for the whole community to come together to socialise, learn to relax, have fun and improve fitness, health and well-being. This would be provided within a state of art well-being hub and state of the art school to replace Lochies ASN school. The WBH would help address the negative impacts associated with the relatively high numbers of people living in poverty, feeling isolated, dealing with health issues and having limited opportunities to work within the area.
- 5.7 The proposed building would achieve a high standard of design and contribute to the visitor experience. Furthermore, it would comprise a highly sustainable design which would contribute to the decarbonised grid system supporting low or zero carbon standards and minimising greenhouse gas emissions.
- 5.8 The development would deliver high quality public open spaces to support sport, play, active travel and well-being. Significantly, the design of outdoor spaces will be central to the promotion of physical and mental health and well-being through integration of nature. The landscaping would result in an enhancement to the current biodiversity value of the site.
- 5.9 It is concluded that subject to the proposed mitigation measures the development would not have any significant adverse impacts on natural

heritage interests, including the Firth of Forth SPA and Ramsar site and River Forth SSSI or any protected species.

5.10 The development would be consistent with a number of Council priorities and objectives including;

- Securing the ambition of a network of high quality, accessible and affordable sport and leisure facilities by 2028 as set out in Sport and Active Living Framework (SALF) published in 2018.
- Aligning with Be the Future (2018-30) strategic themes and the Clackmannanshire Well-Being Economy priorities in the Clackmannanshire Local Outcomes Improvement Plan.
- Complementing the Clackmannanshire Family Wellbeing Partnership which aims to improve the wellbeing and capabilities of individuals and communities, creating opportunities which promote social justice and tackle poverty and inequality.

5.11 Conclusions

5.12 In reaching a recommendation, consideration has been given to the advice issued by the Scottish Government's Chief Planner in 2023 which highlighted that;

- NPF4 must be read and applied as a whole
- factors for and against development will be weighed up in the balance of planning judgement
- when applying Section 25 to reach a decision, application of planning judgement to the circumstances of an individual situation remains essential to all decision making, informed by principles of proportionality and reasonableness.

5.13 While our assessment of relevant development plan policies identified some tensions with Policies ED4, 13 and 27, with the proposed mitigation measures, the application was not considered to be contrary to these Policies, or any other Policies in the Development Plan. This conclusion has had regard to the proposed design and layout of the development, which will comprise a WBH and ASN School in one single energy efficient building and a large area of outdoor public space which will also be central to the promotion of physical and mental health and well-being and will also have a significant value in creating a facility where the community can socialise, learn, relax, have fun and improve their fitness and health. The layout and range of facilities to be provided requires a site extending to approximately 6.5 Ha and this is a key factor in demonstrating that the scale of the development cannot be reasonably altered or reduced in scale to allow it to be accommodated at the former Leisure Bowl, which is the only identifiable site available closer to the town centre. Therefore any sequentially more suitable sites are considered to be unsuitable or unavailable. The proposals therefore are considered to satisfy the 3 criteria set out in Policy 27 where an out of centre location can be supported. In addition, mitigation in the form of a public transport service between the site and Alloa Town Centre and improvements to active travel links to create safe and attractive links including from Alloa Town Centre will be delivered as part of the development. These factors will

mitigate the relatively poor standards of public transport and strategic active travel links identified by the Transportation Service in its original consultation response and are considered key elements of the overall proposals. The distances therefore for walking or cycling or using public transport between the site and Alloa Town Centre and the residential areas to its east and south east are not considered to be sufficiently adverse to outweigh the strength of overall policy support in relation to NPF4. The development will deliver a significant resource for Clackmannanshire in terms of enhancing health and well-being and education in addition to replacing the swimming pool facility following the closure of the Leisure Bowl. It is considered to positively contribute to the Clackmannanshire Wellbeing Local Outcomes Improvement Plan and the Clackmannanshire Alliance's Sport and Active Living Framework and national spatial strategy set out in NPF4 to deliver; sustainable places; liveable places and productive places.

- 5.14 The objections have been carefully assessed. Many have argued for a development on land closer to the town centre, which would be sequentially more suitable in terms of Policy 27. Those objections also highlight that the social and economic characteristics of some of the areas to the south and east of the town centre include proportionately more households where efforts to tackle poverty and inequality are being directed by the Council and its partners. The provision of the WBH will provide services and facilities designed to improve the health and well-being of these groups as well as the wider population of Clackmannanshire. However, as discussed above, the application is not considered contrary to Policy 27 or other NPF4 Policies and the relationship between the development and these areas is not considered to result in adverse impacts which would, on their own, outweigh the strength of overall policy support in relation to NPF4. The development is also not considered to displace existing activities from Alloa Town Centre. It is concluded that on balance, the objections would not provide sufficient or reasonable grounds to outweigh the development plan support for the application and justify withholding permission. The development is considered to deliver benefits which would outweigh any conflicts identified. There are no other material consideration which would justify withholding permission and the application is recommended for approval as set out in Para 2.1 of the report.

6.0 Sustainability Implications

- 6.1 The proposal relates to development on a site allocated for business or industry development in the Development Plan on the edge of Alloa. The proposals are considered to accord with the principles of NPF4 in relation to delivering sustainable and liveable places.

7.0 Resource Implications

7.1 Financial Details

- 7.2 The full financial implications of the recommendations are set out in the report. This includes a reference to full life cycle costs where appropriate. Yes

7.3 Finance have been consulted and have agreed the financial implications as set out in the report. Yes

8.0 Exempt Reports

8.1 Is this report exempt? Yes (please detail the reasons for exemption below) No

9.0 Declarations

The recommendations contained within this report support or implement our Corporate Priorities and Council Policies.

- (1) **Our Priorities** (Please double click on the check box)
- | | |
|--------------------------------------------------------------------------------------------------|---|
| Clackmannanshire will be attractive to businesses & people and ensure fair opportunities for all | X |
| Our families; children and young people will have the best possible start in life | X |
| Women and girls will be confident and aspirational, and achieve their full potential | X |
| Our communities will be resilient and empowered so that they can thrive and flourish | X |

- (2) **Council Policies** (Please detail)
N/A

10.0 Equalities Impact

10.1 Have you undertaken the required equalities impact assessment to ensure that no groups are adversely affected by the recommendations?

- The application has been subject to an Equalities Impact Assessment

11.0 Legality

11.1 It has been confirmed that in adopting the recommendations contained in this report, the Council is acting within its legal powers. Yes

12.0 Appendices

12.1 Please list any appendices attached to this report. If there are no appendices, please state "none".

- Appendix 1 – List of parties who have submitted objections or representations
- Appendix 2 – Summary of Representations and Planning Service Comments

13.0 Background Papers

13.1 Have you used other documents to compile your report? (All documents must be kept available by the author for public inspection for four years from the date of meeting at which the report is considered)

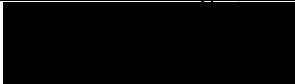
Yes (please list the documents below) No

- Adopted Clackmannanshire Local Development Plan 2015
- NPF4, 2023
- Clackmannanshire Alliance – Wellbeing Local Outcomes Improvement Plan
- Clackmannanshire Alliance – Clackmannanshire Sport and Active Living Framework 2018-2028

Author(s)

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Keith Johnstone	Principal Planner	01259 452614

Approved by

NAME	DESIGNATION	SIGNATURE
Grant Baxter	Planning & Building Standards Team Leader	

APPENDIX 1 - List of parties who have submitted objections or representations

Objections

Muckhart Community Council

Alloa Community Council

Alloa First, 49 High Street Alloa FK10 1JF

Anthea Coulter, CTSI, 27 High Street Alloa FK10 1JF

Sauchie Active8, Sauchie Hall Mar Place Sauchie FK10 3DY

Ella Pretorius, 8 Rosebank Sauchie FK10 3NP

John Glass, 22 Forrester Grove Alloa FK10 2HT

Mrs Alyson Haldane, 14 Ochil Road Alva FK12 5JT

Thomas Brown, 3 Alexandra Drive Alloa FK10 2DQ

Bill Stirling, 7 Shire Way Alloa FK10 1NQ

Neil McFarlane, 41 Mill Street Alloa FK10 1DW

Trevor Andrews, 31 Church Street Alloa FK10 1DH

Mrs Teresa McNally, 26 Tulligarth Park Alloa FK10 2DD

Robbie Weld, 12 Auchinbaird Sauchie FK10 3HB

Daphne Hamilton, 16 Candleriggs Alloa FK10 1EA

Margaret Macfarlane, 5 Forrester Grove Alloa FK10 2HT

Neil Scott, 10 The Hennings Sauchie FK10 3ES

Craig Miller, 3 Meadow Park Alva FK12 5AQ

Mary Fox, 47 Hillcrest Drive Alloa FK10 1SD

Carol Ann Dowd, 48 Lornshill Crescent Alloa FK10 2JL

Fiona M Blake, 16 Ochil Street Tillicoultry FK13 6EJ

Moira Bruce, 22 Parkway Court Alloa FK10 2AD

Francis Allan, Glencroft Glenochil Farm Lane Dollar FK14 7LN

Joan Docherty, 19 Shillinghill Tillicoultry FK13 6BB

Meredith Copland, 15 Stirling Street Tillicoultry FK13 6EA

Gary Robertson, 19 Munro Place Alloa FK10 1QT

Linda Andrews, 31 Church Street Alloa FK10 1DH

Representations

Alva Community Council, Graham Gilmour, 2 Coblecrook Lane Alva FK12 5BF

Ross Barclay, R M Donaldson Ltd, 1 The Harlands Alloa FK10 1TB

David Brown, 12 Queen Street Alloa FK10 2AR

Scottish Wildlife Trust Volunteer Planning Team 3 Alexander Drive, Bridge of Allan
FK9 4QB

Appendix 2 - Summary of Representations and Planning Service Comments

The numbered points below summarise the issues raised in objections and the follow-on text in italics summarise Planning Service comments in response, where required.

1. Public accessibility is poor. NPF4 emphasises active travel over car centric planning and the proposed site would be a more car centric location. A more centrally located WBH would be more accessible including for those with limited mobility and resources. If the site is out of reach of the majority of the non car owning population it will fail to adhere to the Council's Sport and Active Living Framework (CS&ALF) which aims to ensure facilities are accessible to all particularly those who already face barriers through poverty, life circumstances or disability. Therefore the proposal will not deliver on Priorities 1, 2 and 3 of CS&ALF 2018-28. The site is at least 30 mins walk from the town centre and railway station. If the WBH is not accessible it will affect its success in reducing health inequalities. The site only allows 15-20% of residents to walk to the site. Most communities won't be able to reach the WBH within 20 mins without a car. This does not accord with 20 min neighbourhood concept. The access road would need severe upgrades which the Council would not do. The former Leisure Bowl site would help address these issues.
2. Public transport links would be more accessible within the town centre where connections are available helping to make it easier for people without private vehicles. There is limited public transport serving the site at present so how can the WBH meet the public's desire for evening and weekend opening without regular additional bus services. Additional services may require an additional journey to reach the site and this will add cost for individuals and the Council, such as from Sauchie and may be hard to sustain given experience with the service to the hospital. These issues were raised at the community forums when the project was discussed. The WBH would also not be accessible from existing schools other than Redwell PS.
3. There is no public transport to the locality from the Muckhart or Dollar communities and only a limited bus service that passes the site. Is the existing C1 bus large enough and does the frequency needs to improve, especially at weekend and after school times? It may be faster to get to the Peak in Stirling than the proposed site for residents in Dollar and Tillicoultry.
4. The proposed development fails to meet the aims and priorities of the Clackmannanshire Local Outcomes Improvement Plan (LOIP) and the Council's Sport and Active Living Framework. The former sets out a joint commitment to tackling the inequalities that exist and identifies 4 key Outcomes: Clackmannanshire will be attractive to businesses & people and ensure fair opportunities for all; Our families - children and young people will have the best possible start in life; Women and girls will be confident and aspirational, and achieve their full potential; Our communities will be resilient and empowered so that they can thrive and flourish. The latter aims to ensure physical activity opportunities will be accessible for all and particularly those who already face barriers through poverty, life circumstances or disability.

Planning Service Comment - Our assessment of the issues raised above has had regard to the following points;

- i) *Our assessment of the application against Policy 27 has concluded that the development would not be contrary to the Policy as it would satisfy the criteria listed in the Policy where a location outwith a town centre will be supported. This is discussed in detail in Paras 4.26 – 4.28 of this report. Overall, the application is not considered to be contrary to policies in the development plan.*
- ii) *The proposed development cannot reasonably be located within or on the edge of Alloa Town Centre. The vision of the project and the services and benefits it would provide are based on shared building containing a ASN school and a WBH which contains indoor and outdoor facilities and environments which could not be realistically fitted within any sequentially preferable site , including the vacant former Leisure Bowl site.*
- iii) *While the proposed location would be further from the most deprived areas in Alloa than a location in or next to the town centre, there will be mitigation by the provision of a bus service between the site and Alloa town centre. The bus service is considered to provide significant mitigation given the limited service provision at present and it would enhance accessibility for those without access to a car. The active travel links to the site will also be upgraded including to the town centre to make them safe and accessible for all. This will have regard to the issues of safety and the impact on certain demographics including women.*
- iv) *The development will serve the whole of Clackmannanshire and the wider benefits that would be provided have to be balanced with priority groups.*
- v) *The proposed development is considered to sufficiently align with the Clackmannanshire Alliance`s Sport and Active Living Framework in relation to its vision of inspiring people to “get out – get going – get active” and the 4 priorities of; Active Communities; Infrastructure and Place; Schools and education; and Leadership and Governance. The development is also considered to align with the national Active Scotland Framework to increase activity.*
- vi) *It is considered that the development would positively contribute to the Clackmannanshire Wellbeing LOIP 2024-2034 and its vision for “Working together to reduce inequality and improve the well-being of all people in Clackmannanshire” and its 3 strategic outcomes; Well-being; Economy and Skills; and Places.*
- vii) *The application has to be assessed and determined on the basis of the planning merits of the proposed design and location and not based on whether there could be alternative designs or locations. Our assessment has concluded that the proposal as submitted would not be contrary to the relevant Policies in the development plan.*

5. Under the Community Empowerment (Scot) Act 2015, community planning partners have a legal duty to demonstrate they are bringing about a significant impact on improving outcomes and reducing inequality and disadvantage. It is considered that the proposal for a WBH at Alloa West has failed to demonstrate how it would improve outcomes, reduce inequalities and reduce the extent of disadvantage facing children and families across Clackmannanshire. *Planning Service Comment– the supporting documents set out the objectives of the proposed development and it is considered that the development as proposed would have a significant positive impact on improving outcomes and reducing inequality and disadvantage for local residents and would complement the strategies employed by community partners.*

6. Item 8 on the Council Agenda of 16/12/2021 accepted Alloa West and Leisure Bowl site be put forward as the preferred location for a WBH. Had an Equalities Impact Assessment (EqIA) been undertaken at this point, applying the Councils principles of Community Wealth Building, Environmental Sustainability, Affordability and Inclusivity, and Accessibility, the Alloa West site would have been ruled out. This is because most communities would be unable to reach Alloa West within 20 minutes of active travel including areas with higher deprivation and there is no evidence that a WBH at Alloa West will reduce inequality and disadvantage. *Planning Service Comment – the application has to be determined on the planning merits of the proposed location. The accessibility of the site is discussed above and in relation to Policies 13 and 27 in Section 4.0 of the report. It is the case that the number of people living within walking distance of a site in or on the edge of the town centre will be substantially greater than numbers around the proposed site, and it would include a significantly higher percentage of areas with higher levels of deprivation. However, there is considerably less disparity between the sites in terms of the number of people within cycling distance and percentage within areas with higher levels of deprivation.*

7. A location should be pursued which would help increase footfall for businesses in Alloa town centre as the proposed site will not do this. Increased foot traffic in the town centre would support local businesses and contribute positively to the community's economic health. The development would have a negative impact on the Alloa Town Centre's economy. *Planning Service Comment – Policy 27 states that proposals will be consistent with the town centre first approach. While the Policy supports and encourages development in town centres which will generate significant footfall, it does specify criteria which if met, would justify locations outwith a town centre. As discussed in Paras 4.26 - 4.28, it is concluded that the proposal would sufficiently satisfy the criteria and the application is not considered to be contrary to this policy. It is not considered that the development would have a negative impact on the town centre economy as the development would not displace activity currently taking place in the town centre.*

8. A town centre location is generally safer for both users and employees due to higher visibility and activity levels, CCTV and well lit streets. There would not be surveillance of the proposed site while there would be trees on 2 sides, industrial and school uses to the east and north and open fields to the west. The most direct route from the WBH to the town centre is through West End

Park which may not be perceived as safe by young people and women. *Planning Service Comment – the development would be served by lit paths and there is likely to be significant and regular footfall to and from the site during its operating hours. Safety will be a key consideration in the design of enhanced active travel links to the site. It is not considered that there would be significant differences in safety between the locality of the site and Alloa Town Centre.*

9. A central location encourages the use of public transport, reducing car dependency and benefiting the environment through lower emissions. The proposal would undermine Policy 1 by adding traffic to and car usage to reach Alloa West. *Planning Service Comment – a more central location may be more accessible by public transport and have less reliance on the car, however to address this, the development will deliver a public transport service between the site and Alloa Town Centre and upgraded active travel links which will help encourage trips by more sustainable modes and mitigate the environmental impact of traffic movements generated by the development. Our assessment concluded that the proposal is therefore not contrary to Policy 1 as set out in Para 4.5 of the report.*
10. The poor level of accessibility of the site would restrict employment opportunities especially for people who rely on public transport for travel. A town centre location would provide better access to public transport. *Planning Service Comment - the site will be accessible by public transport and active travel routes. The applicant has also advised that a number of employment and training schemes will be delivered as part of the project to support local employment including priority groups. The proposal fails to support the quality of life for town centre residents and fails to recognise importance of the number of people within the radius of the site that would be able to walk to the development. Pedestrian access in Alloa town centre would be at least 30% higher than the proposed site. Planning Service Comment - the development will be accessible from the town centre and a direct public transport service and upgraded active travel route will be provided. The development also requires to serve all residents of Clackmannanshire. The planning merits about the siting of the development are discussed in Section 4.0 of the Report.*
11. The justification for co-locating the WBH and ASN school fails to outweigh the broader community benefit of location of a pool facility on the former Leisure Bowl site. Why must the ASN school be built on the same site? The future success and accessibility of the WBH is considered to depend on its placement within a central, well connected area. *Planning Service Comment – as discussed in Section 4, the applicant has outlined why the WBH and ASN school have been located in one building as a campus, and the planning application must be assessed on the basis of this as the submitted proposal. The Planning Service’s assessment of Policy 27, which requires the Town Centre First approach to be applied to the development, has concluded that the application is not contrary to this Policy and the criteria which would justify an out of centre location have been satisfactorily met.*
12. Alloa First is unaware of any consultation with the local business community about the proposed community and all stakeholders should be involved. The

project appears to have lacked consultation prior to enacting. Sauchie Active8 Group advise they hoped to be part of wider consultation when new wellbeing worker arranged to visit the Sauchie Active8 youth club to discuss plans but cancelled twice with no follow up. *Planning Service Comment – the application has been subject to publicity in accordance with the statutory requirements. As a Major development, the applicant undertook extensive pre-application consultation which accords with the statutory requirements. The nature and extent of wider consultation activities unrelated to the planning process, do not materially affect the planning merits of the application.*

13. Muckhart Community Council also highlight;

1. The site is accessible from the NCR network but will the NCR route be extended to Muckhart from Dollar to provide a link? *Planning Service Comment – this is not part of the proposals and it is not considered reasonable or justifiable to make permission conditional on the provision of such works.*
2. Will sports facilities be primarily used by the school or the public? *Planning Service Comment – the facilities in the WBH will be primarily available for use by the public.*

14. One point of objection is on grounds of affordability and value of money. Taking on large debt is not in the best interests of local people. It will be a drain on taxpayers now and in the future. No information has been made public on amount of borrowing to fund the project, interest rates and years to repay the debt. Has an adequate cost benefit analysis been carried out given the size of the estimated cost? Will it bring in enough people to be viable? The proposed site is likely to create a long term financial loss and social and health benefit loss for local people. What will be the cost to the community users of this proposed WBH? The development should not result in squandering limited resources such as available from City Deal. Was modernisation of the Leisure Bowl and Lochies school not considered or a hub created from existing Council buildings in proximity to each other? Has consideration been given to the added value if the development was located in the town centre? *Planning Service Comment – the financial implications of the proposed development and whether it makes a profit or not are not material to the consideration and determination of the planning merits of the application. The proposed development has been subject to financial assessment but value for money or ongoing costs would not be valid grounds to withhold planning permission. The scope to renovate the Leisure Bowl was considered by the Council before it was permanently closed while the future of Lochies School has been assessed as part of the Council's Learning Estate Review and replacement was agreed as in the best interests of those attending the school. Whilst reuse of underused buildings is supported by NPF4, it is unlikely the design requirements for the buildings could be successfully and suitably provided within existing buildings in the control of the Council. A location in or next to the town centre could deliver added value for the town centre, but the application is for a site at Alloa West and the application has to be determined on the planning merits of this location. The proposal will also deliver added value for the communities of Alloa and elsewhere in Clackmannanshire in terms of the uses and facilities which it would provide.*

15. Lochies school is being used by the Council to enable the Council to get more grant funding for the WBH. The School and WBH should not necessarily be linked from a planning point of view. *Planning Service Comment – the School and WBH are linked as that is what has been submitted for planning permission, and must be assessed The application has to be assessed and determined on its planning merits only. The justification and reasoning for a combined WBH and ASN School is discussed in Para 4.26 i) and significant weight has been attached to the justification for the combined uses in one building with parkland areas and why it would be unreasonable to require 2 separate locations.*
16. Costs are likely to rise further putting risk on all other capital projects for years to come. *Planning Service Comment - this is not a material planning consideration.*
17. Flood risk does not appear to have been adequately considered. Other comments have highlighted the site is located on a flood plain and concern about tidal flooding. The site “maybe constrained by drainage and flood risk” Fluvial flood risk does not appear to have been adequately considered. There are flood risk areas nearby even if risk on site may be controlled. Could it increase risk on nearby land? Flooding will make driving more dangerous for those attending Lochies School. Do not agree with SEPA who have removed their objection. What guarantee will there be that there will be no pollution of the river Forth? *Planning Service Comment – as discussed in Para 4.18, the flood risk and drainage issues have been adequately addressed and neither SEPA nor the Council’s Flooding Officer have any objections. The development will not be at an unacceptable risk of flooding and fluvial risk has been satisfactorily assessed in accordance with NPF4 and SEPA’s required methodology.*
18. While new employment is important most of the jobs mentioned will be at the construction phase and therefore not long term. *Planning Service Comment – The applicant has stated that post construction, the development would require 67 FTE staff as well as a large number of part time and casual staff (at least 50) for the WBH*
19. Who will own the venture? Is it a Council or a private enterprise? *Planning Service Comment– this is not a material planning consideration.*
20. Land is identified as industrial/business use and does not gain from explicit support from the LDP. The proposal is contrary to local and national planning policy including NPF4 Policies;
 - 13 – (Sustainable transport) – as the edge of town location will increase reliance on the use of private cars
 - 14 – (Design, quality and place)
 - 15 – (Local living and 20 Minute Neighbourhoods) – most primary school children could access a town centre facility safely using “safe routes”

already in place. A town centre location would align with Policy 15 by making the facilities accessible within a short distance for a larger proportion of the population which could increase usage.

- 21 – (Play, recreation and sport) – vii) states development should be overlooked for passive surveillance. The location is out of town and potentially a risk for walkers and cyclists especially in autumn/ winter months.
- 27 – (City, town, local and commercial centres) – it will not accord with the Town Centre First Approach –

Planning Service Comment - our assessment of compliance with relevant policies in the development plan is summarised in Section 4.0. It is concluded that on balance, while there are tensions with some of the Policies, including Policy 27, with the proposed mitigation and the extent to which the proposals would meet the circumstances where an exception to the Policy intent is supported, the application is not contrary to any individual Policies and overall, the application is not contrary to the development plan.

21. The proposed site fails on many counts to reducing carbon footprint. Issues such as constantly having to pump on a flood plain, bussing school children and increasing car traffic all indicates a blatant lack of concern in relation to climate change *Planning Service Comment – the proposed building design would achieve high standards of energy efficiency. The public sewer is located on Smithfield Loan so a connection would have to be pumped. The development would serve the whole of Clackmannanshire and a proportion of trips would have to be undertaken by bus and private car wherever the development was located. Measures will be included to make the site accessible by public transport and active travel trips to help reduce greenhouse gas emissions. The design approach and assessment has not ignored climate change issues.*
22. The site is greenfield and in agricultural use and is in the Green Belt. Disappointing to see productive agricultural land being used for development. NPF4 would favour brownfield over greenfield land *Planning Service Comment – The site is not in the Green Belt and is within the settlement boundary of Alloa as defined by the adopted LDP. The site is part of a much larger site allocated for development in the LDP. The land is not prime agricultural land.*
23. I hope the elected decision makers will take on board the apparent strength of feeling locally that the proposed site is wrong and absolutely not where the majority of the residents & businesses, charities & social enterprises feel it should be located. *Planning Service Comment – this point is referred to in the Report to this Planning Committee.*
24. In the absence of the Leisure Bowl, many community based venues have developed to provide activities. The Sauchie Health Centre provides many classes a week which would be more accessible to local residents. The WBH could adversely affect them if it attracts users to the building away from

community buildings/ services. It could adversely affect the third sector groups. A pool is only really needed and no need for all the other facilities. It could have been a more cost effective option. *Planning Service Comment – the applicant has stated that the proposed facility will not displace activity from existing locations around the Council area including those within town centre locations. The model is to create a network which will link with and complement existing provision to increase levels of activity, health and well-being in the area. The application has to be determined on its individual merits as submitted. The question of need of other facilities is not considered to be a material planning consideration.*

25. Wellbeing should be about people coming together and sharing common interests. For that there should be an area to relax and take refreshments and participate in activities. There are limited entertaining areas to act as a Hub for community. *Planning Service Comment – the WBH includes provision for café and social spaces to relax and meet both internally and externally.*
26. There should be more tree planting to mitigate trees and conservation areas being lost to the site (3 trees to every one lost). Could be off site as well as on site. *Planning Service Comment – the proposed landscaping details would result in a significantly greater number of replacement trees being planted than a 3 to 1 ratio. The on site provision is considered appropriate and adequate.*
27. There appears limited opportunity for genuine biodiversity enhancement outlined in application. *Planning Service Comment – as discussed in 4.7 below, the landscaping and habitats that are proposed will deliver enhancement of biodiversity within the site.*
28. There is no information on possible light pollution to local residents especially if flood lights to be used. *Planning Service Comment– details of the external lighting design and lumination will be regulated by a planning condition. This will address any risk of light pollution to neighbours as well as the existing character of the area.*
29. The development should not adversely affect birds using River Forth habitat – what information shows this? *Planning Service Comment – the application has been subject to an Appropriate Assessment which concludes that there is sufficient information to determine that the development would not have any significant adverse impacts on birds associated with the designated habitats on the River Forth comprising the SPA, Ramsar and SSSI designations. NatureScot agrees with this conclusion.*
30. There is a reliance on the developer contributing to transport to the site. Currently there is a C1 service with 6 services between 0948 and 15.48. How will this meet the needs of those customers wanting to go outwith these times? No information has been provided on proposed transport links to the facilities. *Planning Service Comment – an enhanced public transport service between the site and Alloa Town Centre will be provided as part of the planning permission to provide a suitable service. Upgraded active travel links will also be provided. The details will be agreed through the discharge of planning*

conditions. It is agreed that the current C1 service is not adequate to serve the development. A contribution to public transport service will support travel by sustainable means.

31. The development is likely to cause traffic congestion and diminish comparatively safe access to the surrounding countryside which is well used by families and cyclists. Surrounding road network is already constrained due to on street parking. Needs improvement to network to serve the development with customers coming from all over Clackmannanshire. Planning Service Comment – *The Transportation Service does not object to the application and is satisfied that the development would not adversely affect the safe operation or capacity of surrounding public road network. Traffic management measures would also be installed on Smithfield Loan to safeguard pedestrian and road safety.*
32. There is not enough information about transport links and provision in application. There's not even a safe cycle path being proposed. Planning Service Comment – *Further information has been received during the assessment of the application. The development will include a segregated path to the NCR 76 west of the site and details of upgraded active travel links to the site will also be provided and the details will be regulated by a planning condition.*
33. Safer routes to school already exist for all primaries in Alloa to access the Leisure Bowl site (apart from crossing on Tullibody Rd/ Mar Place) and parking is available at Marshall carpark to reduce need for onsite parking at the Leisure Bowl site. The proposal fails to take advantage of infrastructure already in place at Council owned Leisure Bowl site. Planning Service Comment - *these points are not material to the consideration of the planning application which has to be assessed on the merits of the application as submitted.*
34. Are water pressure and sewage systems capable to service the development?. Planning Service Comment – *Scottish Water has confirmed in its consultation response that there is capacity in the public water supply and foul water system to serve the development.*
35. While not close to the air separation plant that has caused issues such as traffic, any issues at this plant (which carries oxygen through pipes) can still have a reverse effect on the school and those using the WBH. Planning Service Comment– *the operation of the plant is not considered to raise any traffic issues or the safe operation of the WBH and ASN school. The plant is approximately 1.0km from the proposed buildings.*
36. The development will create a precedent for further out of town developments on a greenfield site threatening rich agricultural land. Planning Service Comment– *the site is allocated for development in the adopted LDP. If any further applications were to be submitted for development, these would also be determined on their individual planning merits in relation to the development.*

37. Why no provision for indoor bowling? This was well used at the Leisure Bowl and is important for wellbeing of older residents. Was this considered? There is also no spa/ wellness amenities or sauna/ jacuzzi/ steam room, there should be slides in pool and the pool should be competition standard. Planning Service Comment– *these points are not considered to be material to the consideration of the planning application which has to be assessed on the merits of the application as submitted.*
38. The development involves spending too much on external spaces which are not necessary and should focus spend on indoor facilities. A WBH is not required but rather a leisure centre providing sports facilities. It feels like the WBH is being adapted to fit with the ASN school. Planning Service Comment – *the external spaces form a key element of the project and WBH offer. The proposed WBH will provide a range of services and activities including sport and it is intended to meet more needs of the community than a typical sports centre facility would. The uses would complement each other and the function of the WBH would not be compromised by the ASN school use. The financial value of project is not material to the consideration of the planning application.*
39. A WBH should offer opportunities for safe leisure pursuits that are affordable and value for money. If the conjoining of the 2 uses helps to unlock funding for the facilities, could this approach not be undertaken within the grounds of the former Leisure Bowl and Greenfield House or Park. Planning Service Comment – *the affordability or value of elements are not considered to be material to the consideration of the planning application which has to be assessed on the merits of the application as submitted. The planning merits of locating the development on the former Leisure Bowl site has been addressed in the TCFA and concludes that this would not be a suitable or reasonable alternative site.*
40. There is no need for another visitor information centre as this is already provided elsewhere in the town (library/ the Hub at Shillinghill, Ceteris.) Planning Service Comment – *the proposal is for a WBH and school as described at Para 3.8 and not a visitor information centre.*
41. The spelling of well-being with a hyphen in the description of the development in the application does not help the public searching for the application documents on the Council website and a spelling without the hyphen would have helped. This is considered to demonstrate a lack of attention to detail and lack of inclusiveness. Planning Service Comment – *this issue is not considered to materially affect the statutory publicity process or its inclusiveness or the processing of the application. The search function for the online case file includes a number of alternatives to this word. Additional time has also been given to the publicity period and a further non statutory period to help ensure any party had a reasonable opportunity to submit comments.*
42. Cost of leisure facilities likely to be high for many residents hence central location better to save extra travel. Shouldn't provide subsidised membership for council employees and money used to subsidise holiday events at the facility. Planning Service Comment – *this is not a material planning consideration.*

A number of objections relating specifically to the proposed ASN school were raised and these are summarised below;

43. If the current Lochies school could not be renovated or extended then an alternative location such as within Greenfield House could have been a better fit in relation to NPF4 and would have reused vacant listed building. The former Leisure Bowl site is also viable and there is potential to extend into the former coal yards to the east. This location would be close to Greenfield Park and Sauchie Health Centre for Hub working. The provision of specialist water opportunities for Lochies could be ring fenced at the former Leisure Bowl site with other disability groups being able to access them at other times? *Planning Service Comment– the application has to be determined on the planning merits as submitted rather than in relation to possible alternative options. The suggestions are therefore not considered to be material to the consideration of the application. The ASN school has to be single storey and designed to meet the needs of the pupils and converting Greenfield House is not likely to be a practicable option. The TCFA has considered the suitability of alternative sites, principally the former Leisure Bowl site, and this is discussed in Paras 4.26, 4.27 and 4.28. The applicant has stated that the hydrotherapy pool at the proposed school would be available for community use outwith school hours.*
44. The School should be in the community and not in a far flung site. We have not been able to find another example of an ASN school being established outwith a mainstream education facility. Provision away from a mainstream facility makes it harder for service providers to meet the demands of GIRFEC (Getting it Right for Every Child) while a lack of integration means missing out on use of shared resources, less inclusive environment, less flexible learning opportunities and less professional collaboration. There are examples of shared sites for ASN with mainstream schools at Raploch in Stirling, an ASN facility at Bannockburn High Campus (for less than £5 million) and plans to add ASN facilities to schools in Callender and Balfron and in Perth. These are clear examples of co-locating special needs and mainstream schools and this approach would have provided a more integrated environment for pupils and reduce social inclusion. *Planning Service Comment – the proposed design and location has been determined by the Council as Education authority to provide a high quality learning facility and environment for its users. The application has to be determined on its planning merits and not the educational merits of the proposal which is not considered to be material to the consideration of the application.*
45. Where is the evidence that Clackmannanshire’s Council going against the norm of education authorities across Scotland, is going to improve the outcome for children with ASN? *Planning Service Comment - The application has to be determined on its planning merits and not the educational merits of the proposal which is not considered to be material to the consideration of the application.*
46. The combination of the WBH and school could be a mistake as it has been seen in recent years that adding a community hub to schools has meant venues are less accessible to the public and availability tends to be in evening and weekends. Will the school facilities (including associated sports facilities)

be mainly for school use with limited public access or be public facilities with use by schools? It would be better for all local schools to have their own low tech sports fields and open space. *Planning Service Comment– whilst the operating model cannot be regulated by the planning permission, the WBH would not be part of the school and would be accessible during weekdays as well as evenings and weekends by the community for sport, recreation and well-being activities. It is planned that facilities within the school will be made available for community use outwith school operating periods.*

47. The following positive points were included in the objections received;
- It would be good to have a swimming pool available locally as we need to travel to Stirling to access one.
 - The pool will benefit the community and it should be provided as soon as possible.
 - The closure of the Leisure Bowl was a sad decision but the Council is commended for providing a new community sports facility.

Representations

Representations have been received which neither object nor support the application, including on behalf of Alva Community Council. These can be summarised as follows;

48. The building of a new WBH with swimming pool in Alloa is broadly supported. Alloa is generally centrally located for other communities in the County
49. There are issues with reliability and coverage of public transport services and it is not clear whether there would be any direct services to the site from the Hillfoots. The site is accessible from NCR76 which would encourage active travel trips. Alva would benefit from some improved links in the network to improve the accessibility by cycle. *Planning Service Comment – a public transport link to the site from Alloa Town Centre will be provided. The exact details have to be agreed but it is unlikely to include a direct service to the Hillfoots. However, the service will connect with bus services at Shillinghill. It is not considered reasonable or justifiable to require contributions towards new links in the active travel links network between Alva and Alloa. The route between Alva to Alloa via Menstrie and Tullibody is available and has recently been upgraded to provide a high quality path along the compete length.*
50. SEPA has submitted a holding objection and highlighted a risk from fluvial flooding from a drain to the northwest of the site and requested further information. *Planning Service Comment – SEPA has withdrawn its holding objection following the receipt of additional information from the flooding consultant. SEPA are satisfied with the assessment undertaken relating to flood risk and so is the Council`s Flooding Officer.*
51. There is a risk that contamination on adjoining land could add costs to the project. *Planning Service Comment – a site investigation report has been*

undertaken and this has not identified any significant risks from contamination or ground conditions for the development. The Contaminated Land Team is satisfied with the scope and findings of the Report.

52. Whilst Alva CC remain neutral on the development, it does recognise comments from others about why the former Leisure Bowl site is not being used as it would address some of the issues relating to accessibility to public transport and from the wider community, flood risk and risk of contamination. Planning Service Comment – *it is considered that the proposed development has satisfactorily addressed these issues. The application is for a development at Alloa West and the application has to be determined on that basis.*
53. The lack of a full size all weather football pitch is a major oversight. Planning Service Comment – *this is not considered to be material to the consideration of the planning application which has to be assessed on the merits of the application as submitted.*
54. The development may generate traffic which would adversely affect the surrounding area which contains schools and a nursery. As an adjacent business premises, site contractors may also park on our land. Planning Service Comment – *Transportation has no objection and is satisfied that with the proposed mitigation measures the development could be accommodated at this location without any significant adverse impact on road and pedestrian safety. While the planning process cannot regulate or enforce parking and this is not a material planning consideration. However, the risk is considered to be small and contractors are expected to be on site during standard working hours.*

