

Archived: 25 January 2021 12:34:07

From: [REDACTED]

Sent: Fri, 22 Jan 2021 14:45:42

To:

Subject: PLDP Representation: Ladies Field Coldstream

Sensitivity: Normal

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[REDACTED]

CAUTION: External Email

Dear Sir/Madam

Please find attached a representation to the PLDP on behalf of our client, Andrew Douglas Home.

The representation relates to Ladies Field, Coldstream.

I trust all is in order and I would be grateful if you could please acknowledge receipt in due course.

Kind regards

Philip

Philip Graham MRTPI
Associate Planner
Planning

Savills, Wemyss House, 8 Wemyss Place, Edinburgh EH3 6DH



Tel

[REDACTED]

Website : <http://www.savills.co.uk>



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Representation in relation to land at Ladies Field, Coldstream

Objection to Scottish Borders Proposed Local
Development Plan



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1. Introduction

- 1.1. Savills have been instructed by their client, [REDACTED] to object to the Scottish Borders Proposed Local Development Plan (PLDP) due to the non-inclusion of land at Ladies Field, Coldstream within the settlement boundary. We therefore request that the final Local Development Plan 2 includes an amended settlement boundary which includes this land. **We include a plan at Figure 1 below to indicate precisely the land and boundary amendment to which we refer.**
- 1.2. We propose that the settlement boundary should be delineated to include the access to the prospective cemetery, the western boundary of the cemetery, before running east-west at the mid-point in the field (high point of the field in topography terms), before turning northward and along the tree belt (adjacent to the Greenloaning property), turning eastward and running east-west to the rear of the residential properties on the Kelso Road and back to the cemetery access. We are open to further consideration of this boundary by the Council and/or Reporter as long as the additional land at Figure 1 is shown as being within the final settlement boundary. We consider that Scottish Borders Council could amend the settlement boundary as a non-material change from PLDP to final LDP2.
- 1.3. The alteration to the settlement boundary would result in an additional 2 hectares of land being included within Coldstream (please note this is 4ha smaller in area to previous promotions). This land is to the east of the consented Caravan Park and Greenloaning property, west of the consented cemetery and south of the 3 residential properties located on the Kelso Road (A698). The land is currently a paddock used for grazing on an informal basis. It forms part of a wider field which extends to the south. The land rises gently to the south before levelling off. It is hidden from views from the A698 by mature planting and the existing housing.
- 1.4. Ladies Field has been subject to promotion to previous Scottish Borders development plans. The land has also been subject to planning applications. To date the land has remained outwith the settlement boundary of Coldstream. The primary reason for non-inclusion and no planning consent being issued is a supposed breach in the boundary of the existing settlement which would be caused by development taking place beyond mature planting on the eastern boundary of the site. Our client has always strongly disagreed with this position and we consider there are strong planning reasons as to why it should not be the primary planning concern in relation to the land at Coldstream within this representation.
- 1.5. During and after the preparation and subsequent publication of the PLDP there have been three material changes which we consider significantly bolster the case that the land should be within the settlement boundary. These changes are:
 - 1) Part of the wider Ladies Field land has been consented for a cemetery to serve Coldstream's future needs.
 - 2) A caravan park has been consented to the west of the site and west of the existing settlement boundary.
 - 3) The NPF4 Position Statement has stated that the Scottish Government supports the concept of 20 minute neighbourhoods and Ladies Field has strong credentials to provide this level of accessibility while supporting future development needs in Coldstream
- 1.6. We provide further commentary on our reasoning for a settlement boundary alteration below.

Ladies Field- SBC PLDP Representation



Figure 1- Proposed Addition to Coldstream settlement boundary with the red line boundaries of respective developments consented in 2020

2. Justification for Settlement Boundary Alteration

Material Change to previous landscape assessment position

- 2.1. In previous Housing Land Supplementary Guidance consultation periods and the consideration of the Local Plan Amendment, Ladies Field has not been allocated for housing. The reason given has been that Ladies Field is separated from Coldstream by means of a mature and substantial tree belt on the eastern boundary of the site known as The Lees. There is also reference in responses from the Council and the previous Reporter on the Local Plan Amendment to a Landscape Capacity Study.
- 2.2. Our client has always objected to this assessment for the reason that the position taken is illogical when development on the ground at Coldstream extends westward away from the tree belt. For example to the west of The Lees tree belt on the approach to Coldstream from the west there is: a "Welcome to Coldstream" sign, pavement, street lighting, reduction in the speed limit to 30mph, bus stop and four residential properties. It is also the case that there is a development boundary "island" diagonally opposite Ladies Field which contains key services for the settlement namely the dental surgery and health centre.
- 2.3. Our assertion is that there is no perceptible difference to the extent of Coldstream as a result of The Lees tree belt. In addition, any development at Ladies Field would be unlikely to be seen from the A698. We are confident that should the Reporter visit the site at Coldstream this will be evident.
- 2.4. In addition, it is now the case that there are two consents which we consider bolster the case even further because they change the landscape-led justification to the current definition of the western settlement boundary for Coldstream as shown in the PLDP.
- 2.5. On 28 April 2020 Scottish Borders Council was granted consent for a cemetery on part of the Ladies Field site, as per the red line boundary contained at Figure 1. As a result, a further key service for Coldstream has been consented to the west of the existing settlement boundary. In consenting the cemetery an access will be taken into Ladies Field and so the site will "read" as part of the settlement as people travel past and to the site.
- 2.6. We do not question the policy justification for the cemetery, this is clear and outlined in the Officer's Report. Indeed our client sought to support the Council's requirement for the cemetery by making this land available. We are stressing that in key views from the A698, the new cemetery entrance increases the sense that this land is all part of the built up area of Coldstream.
- 2.7. What can also not be disputed is that further development is consented beyond The Lees planting and that this has an impact on the extent of Coldstream as a settlement. This is shown by the approved layout plan which is included below as Figure 2:

Ladies Field- SBC PLDP Representation



Figure 2: Approved Layout of new Coldstream Cemetery, located on part of Ladies Field land

2.8. On 7 December 2020 a caravan park was given consent on the fields to the west of Ladies Field. The caravan park will cover **6ha of land extending west on the south side of the A698**. Again, we do not dispute the policy justification for the consent of the caravan park but our point is that this consent, when developed, will fundamentally change the landscape as Coldstream is reached from the west on the A698. For example, the visualisation for the development at completion of construction is shown at Figure 3 below and clearly the impression is that this forms the entrance to the settlement of Coldstream.



Figure 3: MFP/VLA Revised Photographic Viewpoint excerpt (Supporting document to application: 19/01454/FUL | Change of use of agricultural land to form holiday caravan and camping park with associated vehicular access roads, parking, landscaping, drainage infrastructure and public car charging points | Land To South Of Dental Health Centre Kelso Road Coldstream Scottish Borders)

- 2.9. Figure 3 also shows that the caravan park extends past the “Welcome to Coldstream” sign and 30mph speed limit change (just visible to the left hand side of the snip, under the speed camera).
- 2.10. It is also interesting to note that within the Officer’s Report for the caravan application certain respondents considered there to be adverse landscape impact. However, other respondents considered there to be a good landscape fit. The Council’s own Landscape Architect has indicated that the development will fundamentally alter the landscape character at this gateway location for a long period of time possibly permanently.
- 2.11. In our opinion, consent of the caravan park means that all visitors and residents approaching from the west will consider they have arrived in Coldstream before they reach the Ladies Field site. They will travel past significant development, key facilities of Coldstream and other visual cues that were listed at paragraph 2.2 including the cemetery.
- 2.12. As a result, we consider that the remaining area of Ladies Field as identified at Figure 1 **has** to be considered as an infill site and should now be enclosed within the settlement boundary. There is now no possible benefit to continuing to “*protect*” this land due to perceived adverse landscape impact on the setting of the settlement. This is particularly the case when it is considered that development on the two hectares identified would be unlikely to be seen from the A698 and so there would be an imperceptible difference between the current situation to a scenario where the site identified is developed.

Emerging National Policy

- 2.13. Since the publication of the PLDP the National Planning Framework 4 Position Statement has been published. We consider that this document provides additional strength to a long-standing argument that we have put forward at Ladies Field which is that its close proximity to the key services of Coldstream makes it an ideal site to provide a highly sustainable development.
- 2.14. The Position Statement outlines that future development sites should be located where all services and infrastructure are nearby (20 minute neighbourhoods). In addition, it is also outlined that future development sites should be located so as to minimise the need to travel and reduce unsustainable forms of transport. There is also a clear focus on the quality of the areas that we will live in and use in the future and the promotion of public health priorities.
- 2.15. When all of the above is considered in the context of Coldstream, then Ladies Field is the perfect location for some form of development. It is a close walk to key local services and facilities, there will be no need to drive to access health facilities, shops, cafes, recreation or education.
- 2.16. The Council and Reporter will also note that the area of land put forward for inclusion within the settlement boundary is significantly reduced from that previously promoted (by 4ha). As a result, the remaining land has potential to be used as existing (for horse grazing) or could have an alternative use such as part of the land being a key community greenspace, such as a garden of remembrance etc. (Note the remainder of land does not require to be within the settlement boundary to fulfil this function).
- 2.17. The NPF4 Position Statement outlines that future Development Plans are to be more collaborative in nature. We consider that the relevant community groups are aware that Ladies Field may come forward for some form of development as our client has always been open about this fact and he has lived in Coldstream for a long period of time. We note that Coldstream has a Community Action Plan and the inclusion of Ladies Field within the settlement boundary and the greater access to the remainder of the land allows for consideration of the use of Ladies Field for development in support of the Action Plan.

3. Existing Coldstream Settlement Boundary and PLDP Content

- 3.1. The settlement profile for Coldstream illustrates that the settlement has allocated land for housing, employment, redevelopment and key greenspace. In particular there is significant land allocated to the north of the settlement.
- 3.2. The proposed alteration of the settlement boundary allows for a windfall opportunity which diversifies the development opportunities available in Coldstream. If Ladies Field was included within the settlement boundary it would bring the opportunity for an appropriate development which was located in close proximity to the key services that Coldstream offers- for example the dental surgery, health centre and Coldstream High Street. An example could be a retirement living development or a further health facility etc.

Ladies Field- SBC PLDP Representation

- 3.3. Our clients have taken cognisance of previous concerns over the extent of land put forward and it is now the case that the land put forward is more modest in scale and has the option of being combined with surrounding land to allow for a windfall development that could bring multiple benefits to Coldstream (as we have previously mentioned).
- 3.4. We do consider that flexibility is required in relation to the type of development that could happen at Ladies Field in the future and so the settlement boundary change is appropriate. Any development that came forward would be tested under the Council's detailed Placemaking and Design policies in particular policies PMD1: Sustainability, PMD2: Quality Standards and PMD5: Infill Development. This means that that any concerns can be examined and mitigated through any application determination.

4. Conclusions

- 4.1. Our objection calls for either a non-material variation to the PLDP by Scottish Borders Council to incorporate the suggested settlement boundary or another appropriate settlement boundary change- as long as the 2ha area identified is included within the final settlement boundary with the potential for development to be considered OR we request that the Reporter undertakes the same steps if SBC object to our proposals.
- 4.2. We consider there is now a material change to the previously taken position in relation to the settlement boundary of Coldstream and its western extent. We consider that The Lees planting is not a defensible boundary to the settlement given the considerable level of development that "breaches" it and the material change to the "gateway" approach to Coldstream as introduced by the new Caravan Park and cemetery site.
- 4.3. The reduced area of land at Ladies Field continues to be an excellent site for development and, as we have outlined, this case has been strengthened by the emerging content of the National Planning Framework 4, including the Place Principle, 20 minute neighbourhoods and resilient communities.
- 4.4. The Ladies Field site brings a windfall opportunity to Coldstream which allows for a range of appropriate development to be considered which is in line with emerging national policy, can help deliver community aspirations as outlined in the Community Action Plan and which will be accessible by sustainable means to the key services and facilities of the settlement.

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]