

ASP/LAH
28th February 2014

Director of Environment & Infrastructure
SCOTTISH BORDERS COUNCIL
Council Headquarters
Newtown St. Boswells
Melrose
TD6 0SA

Dear Sirs,

SCOTTISH BORDERS COUNCIL: PROPOSED LOCAL DEVELOPMENT PLAN

I would like to congratulate Scottish Borders Council on producing a comprehensive and relatively simple to follow document.

During 2011 and 2012 homebuilding completion levels throughout Scotland fell to their lowest levels since 1947 as evidenced by the attached graph produced by the Scottish Government. 90% of new homes presently constructed are being built by 6 or 7 of the largest companies operating in Scotland whilst many small builders find their activities curtailed by the lack of availability of finance for development.

The situation holds true for a number of small local based homebuilders and this lack of activity is further evidenced in the Council's Housing Land Audit and NHBC's Site Commencement and Completion Statistics.

It is fair to say that a number of local house builders are continuing to struggle to balance their books with strong focus on retaining liquidity whilst exploring alternative funding mechanisms.

Support from Local Government is an essential ingredient in small homebuilders efforts to survive the economic downturn until improved trading conditions return and the emerging policies in the Proposed Local Development Plan provide a **key opportunity** for Scottish Borders Council to take stock of the situation and consider some much needed refinements to try and stimulate and support greater levels of housing delivery.

In this regard, I very much welcome the introduction of Policy IS6 - Roads Adoption Standards and the flexible approach proposed by the Council.

However, I would be grateful if Scottish Borders Council could consider the following amendments to the Local Plan which would help unlock and improve the deliverability of smaller sites:

POLICY HD2 - Housing in the Countryside

I note that it is proposed that a Building Group can be extended by the greater of 2 additional dwellings or a 30% increase of the building group.

I would be grateful if this policy could be reviewed to provide greater flexibility by replacing a 30% increase with either "up to" or "around a 50% increase" in the size of a building group which has not been the subject of recent development activity (i.e. within the duration of the previous Local Plan Period).

POLICY IS2 - Developer Contributions

The collection of Developer Contributions to support infrastructure is an acceptable principle in a well functioning Housing Market Area, however since the economic downturn in 2008, the proposed collection of contributions presents a barrier to opening sites to deliver new homes throughout Scottish Borders.

I would therefore welcome a thorough review of the present policy to try and stimulate greater levels of homebuilding activity.

I cannot emphasise strongly enough just how difficult it has been to secure development finance for a number of years and it would be immensely beneficial to SME's if the collection of Developer Contributions was delayed until the point of entry of each new property.

Furthermore, I sense that the introduction of a threshold of 10 units on new sites before the application of Developer Contributions on an interim basis would be extremely helpful to local builders who are still desperately trying to recover from the economic downturn. I would acknowledge that any relaxation requires to be controlled and monitored very carefully however the possible delivery of more new homes and creation of jobs and apprenticeships would hopefully offset the inconvenience of such an arrangement.

The review of the Local Development Plan provides an excellent opportunity for the elected members and official of Scottish Borders Council to play a **key role** in providing much needed new homes to shelter its people and safeguard vulnerable local homebuilding companies.

If the Council can review, amend and introduce Planning Policies to address the economic downturn, the local homebuilding community can help to promote an environment which attracts fresh investment to the Borders, meet local housing delivery targets and create more jobs and apprenticeships whilst tackling the blight of youth unemployment and fuel poverty.

Thank you for taking the time to read this lengthy communication and I would urge you, wherever possible, to use the review of the Local Development Plan to try and address some of the social and economic problems that have arisen since the onset of the recession in 2008.

Yours faithfully,

A black rectangular box redacting the signature of Andrew S. Pearson.

Andrew S. Pearson
Managing Director