

Johnston, Charles

From: John Handley [REDACTED]
Sent: 03 March 2014 15:33
To: localplan; Johnston, Charles
Cc: David Read
Subject: Scottish Borders Proposed LDP - Representation on behalf of Edinburgh Woollen Mill Group - Proposed Mixed Use Allocation of Business & Industrial Sites zEL11 (Riverside 2) and BSELK003 (Riverside 8), Selkirk
Attachments: EWM - Selkirk - LDP MIR Submission 25.06.12.pdf; EWM - Selkirk - Site Overview.pdf
Importance: High

Dear Sirs,

Scottish Borders Local Development Plan: Proposed Plan (2013)
Representation on behalf of Edinburgh Woollen Mill Group
Proposed Mixed Use Allocation of Business & Industrial Sites zEL11 (Riverside 2) and BSELK003 (Riverside 8), Selkirk

We refer to our telephone conversation last week with your Mr Charles Johnston in connection with the current consultation on the Proposed Local Development Plan which ends today.

We understand that there is no Representation Form to be completed, and given the problems with your on-line consultation, that emails are being accepted as an appropriate means of submitting representations to the Proposed Plan. We would therefore request that this email and the attached documents are treated as our formal representation to the Proposed Plan on these matters.

On behalf of our client, the Edinburgh Woollen Mill Group, we therefore wish to provide the comments below in response to the Proposed Plan's allocation of our client's property interests at the Whinfield Mill and Heather Mill sites at Riverside Road/Whinfield Road, Selkirk. This follows on from our submissions on these sites at the Main Issues Report stage.

Our comments on the Proposed Plan therefore relate to the allocation of Business & Industrial Sites zEL11 (Riverside 2) and BSELK003 (Riverside 8) in Selkirk; Section 10.74 Selkirk and the Selkirk Proposals Map.

The Proposed Plan has allocated these sites under Policy ED1 which retains a general presumption in favour of business and industrial uses.

The proposed new allocations also permit "mixed uses" which provides scope for a range of other uses on the sites. The main part of EWM's land-holding is allocated as Site BSELK003 or "Riverside 8" which is classed as a Local Site and specifically permits a range of mixed uses. The northern part of the EWM land-holding is retained as a District Employment Site – zEL11 or "Riverside 2" – and has a preferred use for business and industry, but the ED1 Policy acknowledges that mixed uses may also be appropriate on this site subject to certain criteria.

We welcome the acknowledgment of the mixed use redevelopment opportunities for these sites, and particularly the new allocation for the BSELK003 site. We also support and welcome the desire for the preparation of a Development Brief for this wider area, and would welcome the opportunity to work with the Council on this matter.

However, and further to our representations at the Main Issues Report Stage, we would request that both sites are identified as a specific redevelopment opportunity with scope for redevelopment for a range of mixed uses. This would include: residential; nursing home; tourism; office; retail; leisure and commercial uses; as well as the existing

business and employment uses. This would reflect the sites' brownfield status; relatively high profile location along the edge of the Ettrick Water; accessibility; and the surrounding mix of uses.

In addition to the existing policy support for employment related uses, we would therefore suggest that our client's sites could be redeveloped for a wider range of mixed uses which would maximise job creation and economic development opportunities.

In support of this latest submission, we have attached a copy of our response on the MIR along with the accompanying Site Assessment Report which provides background information on the sites, their recent history and the proposed redevelopment opportunities. The location, extent and nature of our client's sites are also confirmed in the attached Site Assessment Report which provides location plans; aerial and site photographs; extracts from the adopted local plan; extracts from the SEPA Flood Map and the Selkirk Flood Prevention Scheme; and heritage information.

The sites are well-defined development sites located within the Riverside/Dunsdale Road industrial area and extend in total to over 3.0 hectares. The sites comprise the former Whinfield and Heather Mills; part of the Bridgehaugh Dyeworks and adjacent land. They are bounded by and accessed directly from Riverside Road, Whinfield Road, South Bridge Street and Rodgers Road.

There are a collection of former mill buildings on the sites, but none are in active use and are lying vacant and derelict. Two separate areas of extensive undeveloped land are situated to the east of the main Mill buildings. Whilst there is some heritage interest in the mill buildings, none of the buildings are listed and all are in relatively poor condition. They have been derelict for a number of years. None of the buildings are considered to have any intrinsic heritage or architectural value, and as they are not listed, or within a Conservation Area, could be demolished.

The sites are located on the edge of the wider industrial area and are surrounded by a varied mix of existing uses. To the north is Riverside Road with the Ettrick Water and riverside walk beyond. Over the River to the north is the established and proposed housing areas at Cannon Street and Lingle Road. To the south is Whinfield Road and Rodgers Road with a variety of business, office, workshop and commercial uses beyond, including the Scottish Borders Housing Association and Visit Scotland Office buildings. Other adjacent uses include the Dunsdale Workshops and the Travis Perkins Builders Merchants.

There are also a number of existing residential properties located between the Whinfield Mill and Heather Mill sites. To the east lies the Rodgers Road business units, with the Loch Carron workshop, visitor centre and coffee shop further beyond. To the south west is Victoria Park, with its play areas and campsite. The sites are therefore surrounded by a wide range of differing land uses, including housing; offices; commercial; storage; retail; recreation; tourism and leisure uses.

Being surrounded by roads on all four sides, the sites are highly accessible and further benefit from their links to the adjacent riverside path and connections north of the Ettrick Water. They are relatively well connected to the town centre and the A7, and existing bus stops are located along Dunsdale Road.

As a result of their brownfield status; relatively high profile location along the edge of the Ettrick Water; accessibility; and the surrounding mix of uses, our client's sites have the opportunity to be redeveloped for a wider range of mixed uses which would maximise job creation and economic development opportunities.

We would therefore request that the Proposed Plan is amended to make reference to a single new allocation which would include both of these sites as a mixed use redevelopment opportunity. This would include the requirement to prepare a Development Brief to set the planning framework to guide the proposed new uses on this site.

This approach would reflect the single land ownership, and would be consistent with the advice contained within the SPP, the SESplan and the objectives of the Proposed Plan itself, all of which provide policy support for the redevelopment of these brownfield sites which would contribute to the objectives of sustainable economic growth. This recommended amendment would permit the redevelopment of these vacant and derelict sites for a high quality, sustainable mixed use development in an accessible location.

We trust these comments and recommendations will be given appropriate consideration, and would wish to stress that our client is keen to progress matters in partnership with the Council and would welcome the opportunity to discuss the terms of this representation in further detail, should the opportunity arise.

We would be grateful if you could confirm safe receipt of this email and keep us advised of further progress on the LDP.

Yours faithfully

John Handley
Director

John Handley Associates Ltd
Chartered Town Planning Consultants
1 St Colme Street
Edinburgh
EH3 6AA



25 June 2012

JOHN HANDLEY ASSOCIATES LTD

Chartered Town Planning Consultants

1 St Colme Street

Edinburgh

EH3 6AA

By email to: localplan@scotborders.gov.uk

Plans and Research Team
Scottish Borders Council
Council Headquarters
Newtown St Boswells
Scottish Borders
TD6 0SA



www.johnhandley.co.uk

Dear Sirs

**Scottish Borders Local Development Plan – Main Issues Report
Proposed Allocation of Mixed Use Redevelopment Opportunity
Former Whinfield Mill & Heather Mill, Riverside Road/Whinfield Road, Selkirk
On behalf of The Edinburgh Woollen Mill Group**

We refer to your letter of 12 April 2012 inviting the submission of comments on the Local Development Plan Main Issues Report and our subsequent meeting with your Charles Johnston and Kristina Bell on 8 May in connection with the potential for redevelopment of the Whinfield Mill and Heather Mill sites at Riverside Road/Whinfield Road, Selkirk.

On behalf of our Client, The Edinburgh Woollen Mill, we welcome the opportunity to make representations at this stage in the preparation of the new Local Development Plan, and whilst we did not make submissions at the earlier *Expression of Interest* stage in 2011, would request the allocation of our Client's sites at Riverside Road/Whinfield Road, Selkirk in the LDP as a mixed use redevelopment opportunity.

To assist your consideration of this request, we have set out below further comments in relation to the proposed redevelopment, including a review of the site; its planning history and its opportunities for redevelopment.

We have also provided a specific response to the relevant sections and questions set out in the Main Issues Report.

Site Description & Location

The location, extent and nature of our Client's sites at Riverside Road are reviewed in the attached Site Assessment Report which provides: location plans; aerial and site photographs; extracts from the adopted local plan; extracts from the SEPA Flood Map and the Selkirk Flood Prevention Scheme; and heritage information.

The sites are well-defined development sites located within the Riverside/Dunsdale Road industrial area and extend in total to over 3.0 hectares. The sites comprise the former Whinfield and Heather Mills; part of the Bridgehaugh Dyeworks and adjacent land. They are bounded by and accessed directly from Riverside Road, Whinfield Road, South Bridge Street and Rodgers Road. The location and extent of the site are confirmed in the attached Site Assessment Report.

Heritage Value

There are a collection of former mill buildings on the site, but none are in active use and are lying vacant and derelict. Two separate areas of extensive undeveloped land are situated to the east of the main Mill buildings. Whilst there is some heritage interest in the mill buildings, none of the buildings are listed and all are in relatively poor condition. They have been derelict for a number of years. None of the buildings are considered to have any intrinsic heritage or architectural value, and as they are not listed, or within a Conservation Area, could be demolished.

Surrounding Land Uses

The sites are located on the northern edge of the wider industrial area and are surrounded by a varied mix of existing uses. To the north is Riverside Road with the Etrick Water and riverside walk beyond. Over the River to the north is the established and proposed housing areas at Cannon Street and Lingle Road. To the south is Whinfield Road and Rodgers Road with a variety of business, office, workshop and commercial uses beyond, including the Scottish Borders Housing Association and Visit Scotland Office buildings. Other adjacent uses include the Dunsdale Workshops and the Travis Perkins Builders Merchants.

There are also a number of existing residential properties located between the Whinfield Mill and Heather Mill sites. To the east lies the Rodgers Road business units, with the Loch Carron workshop, visitor centre and coffee shop further beyond. To the south west is Victoria Park, with its play areas and campsite.

The site is therefore surrounded by a wide range of differing land uses, including housing; offices; commercial; storage; retail; tourism and leisure uses.

Planning History

Given the site's former mill-related uses, there are a number of planning permissions associated with this former use, but these are all minor extensions which relate to the former use of the buildings.

Flood Prevention Scheme

The current local plan highlights the significant flooding issues that affect the Riverside area. However, the Council has been progressing flood mitigation measures to address this issue.

Following discussions with the Council's Project Manager for Flood Protection, it has been confirmed that the Selkirk Flood Protection Scheme 2012 (which includes substantial mitigation measures along the Riverside Area) will be presented to Council at the end of June for final approval. Stage 6 (Detailed Design) will then commence with a 12 to 15 month duration, and details of funding of Stage 7 & 8 (Procurement & Construction) should be confirmed by spring of 2013. The flood risk issues are therefore being addressed and will, subject to available funding, be in place within the period of the new LDP. This will effectively remove any flood risk issues associated with this redevelopment site.

Accessibility

Being surrounded by roads on all four sides, the sites are highly accessible and further benefit from their links to the adjacent riverside path and connections north of the Etrick Water. They are relatively well connected to the town centre and the A7, and existing bus stops are located along Dunsdale Road.

Current Allocation in Adopted Local Plan & Local Plan Amendment

The currently adopted local plan confirms that Selkirk is an important development opportunity within the Primary Development Hub and is identified in the approved Structure Plan as an area for longer term growth. Its attractive setting makes it an important tourism destination and it is relatively close to the proposed railway stations. The riverside area has been a priority for employment related development and has seen the redevelopment of some of the redundant mill buildings. There are recognised constraints to growth including flood risk, particularly in the riverside area and road capacity with the centre of the town posing particular difficulties for traffic movement and parking.

Our Client's sites are currently allocated as part of the larger Riverside employment area (site ref: zEL54) with the two currently undeveloped parts of the site identified as specific development opportunities (site refs: zEL10 and zEL11). The current Policy (ED1) seeks to protect existing employment land. Relevant Extracts from the Adopted Local Plan are contained in the attached Site Assessment Report.

Redevelopment Opportunities

As a result of its brownfield status; its relatively high profile location along the edge of the Etrick Water; its accessibility; and the surrounding mix of uses, our Client's site has the opportunity to be redeveloped for a wider range of mixed uses which would maximise job creation and economic development opportunities. In addition to the existing support for employment related uses, we would suggest that our Client's site has the potential to be redeveloped for a range of mixed uses including: residential (private and affordable housing); nursing home; tourism; office; retail; leisure and commercial uses.

The redevelopment of this key site for a range of higher value land uses would contribute to the objectives of sustainable economic growth and would allow the redevelopment of a vacant and derelict site for a high quality, sustainable development in a key strategic location.

Recommendation

We would therefore request that this site is removed from the current Policy ED1 allocation (as set out in the current Local Plan) and identified as a specific redevelopment opportunity with scope for redevelopment for a range of mixed uses. This would include: residential; nursing home; tourism; office; retail; leisure and commercial uses; as well as the existing business and employment uses.

Justification for Proposed Amendment

This change can be supported by the principles and objectives set out in the Scottish Government's policy on land use planning (SPP).

The Government's SPP confirms that Development Plans should be aspirational, realistic and provide for opportunity (SPP paragraphs 14 &15).

The planning system should proactively support development that will contribute to sustainable economic growth and to high quality sustainable places; and planning authorities should take a proactive approach to development, recognising and responding to economic financial conditions in considering proposals that could contribute to economic growth. (paragraph 33).

The SPP confirms that decisions on the location of new development should promote regeneration and the reuse of previously developed land; and promote the development of mixed communities (paragraph 38).

In terms of Economic Development, the SPP confirms that planning authorities should respond to the diverse needs and locational requirements of different sectors and sizes of businesses and take a flexible approach to ensure that changing circumstances can be accommodated and new economic opportunities realised. Removing unnecessary planning barriers to business development and providing scope for expansion and growth is essential (paragraph 45).

The planning system should support economic development in all areas by promoting regeneration and the full and appropriate use of land, buildings and infrastructure, supporting development which will provide new employment opportunities and enhance local competitiveness, and promoting the integration of employment generation opportunities with supporting infrastructure and housing development. The planning system should also be responsive and sufficiently flexible (paragraph 45).

The SPP (paragraph 46) advises that planning authorities should ensure that there is a range and choice of marketable sites and locations for businesses allocated in development plans, including opportunities for mixed use development. The supply of marketable sites should be regularly reviewed. New sites should be brought forward where existing allocations do not meet current and anticipated market expectations. Where identified sites are no longer considered appropriate or marketable, they should be reallocated for another use through the development plan. The specific needs of different businesses should be taken into account in development plans, including the importance of access to the strategic road and rail network (paragraph 46).

Paragraph 11 of the SPP advises that development plans guide the future use of land and the appearance of cities, towns and rural areas. They should indicate where development, including regeneration, should happen and where it should not; and paragraph 14 confirms that development plans should provide clear guidance on what will or will not be permitted and where. This should be very clear from the proposals map. Only policies that provide a clear indication of how a decision maker will react to a development proposal should be included in the plan. Plans should therefore provide opportunity and stability.

On this basis, we would suggest that there is both a need and justification for a specific mixed use regeneration allocation in the new LDP for our Client's site at Riverside Road/Whinfield Road, and this can be supported by key parts of the Government's Planning Policy Statement as reviewed above.

Response to the Main Issues Report Questions

Our submission seeks the specific allocation of our Client's site within the new LDP, we have therefore responded below to Questions 3, 4, 5, 7, 8 and 13 as they relate to our Client's proposals.

Question 3: We support the inclusion of Selkirk as a key element of the Central SDA and its important role as part of the Spatial Strategy.

Question 4: We support the suggested review of employment land, and would request that the supply of existing allocated sites should be reviewed, and where identified sites are no longer considered appropriate or marketable, they should be reallocated for another use.

Question 5: We support the establishment of an employment land hierarchy to more clearly identify those locations that should be retained solely for employment use, and those which may have potential for mixed use. As set out above, we would request that our Client's site is reassessed and allocated as a mixed use development opportunity in the new LDP.

Question 7: We support the alternative option that the scale of additional housing land should be increased from that set out in the SDP. This would provide opportunities for further housing land allocations in appropriate locations.

Question 8: We do not agree with the preferred options for additional housing sites in Appendix A, and as set out above, would request that our Client's site is identified as a mixed use redevelopment opportunity with scope for new housing development.

Question 13: We support the focus on regenerating brownfield sites, and agree with the preferred option to identify and promote redevelopment opportunities across the Borders. As set out above, we would request that this includes the identification of our Client's site as a mixed use redevelopment opportunity.

Summary

In summary, we would request that the current allocation of our Client's site is amended in the new LDP to provide for a wider range of mixed uses as set out in our Recommendation above.

This approach would be consistent with the advice contained within the SPP and would reflect the site's brownfield status; its relatively high profile location along the edge of the Ettrick Water; its accessibility; and the surrounding mix of uses.

We trust these comments will be afforded due consideration in your preparation of the new LDP and we look forward to your response regarding the above representation. We would also welcome the opportunity to meet with you to discuss this matter in further detail.

Yours faithfully



John Handley
Director
John Handley Associates Ltd

Enc: 1. Site Assessment Report

cc: Mr David Read, EWM

The Edinburgh Woollen Mill®



Proposed Redevelopment of Whinfield Mill & Heather Mill Riverside Road/Whinfield Road, Selkirk



JHA

JOHN HANDLEY ASSOCIATES
PLANNING CONSULTANTS

JOHN HANDLEY ASSOCIATES LTD
Chartered Town Planning Consultants
1 St Colme Street
Edinburgh
EH3 6AA
t: 0131 220 8253
www.johnhandley.co.uk

Proposed Redevelopment of Whinfield Mill & Heather Mill Riverside Road/Whinfield Road, Selkirk

Site Assessment Information

Contents:

1.0 Site Location Plan

2.0 Aerial View of Sites

3.0 Site Photographs

4.0 Extract from Adopted Local Plan

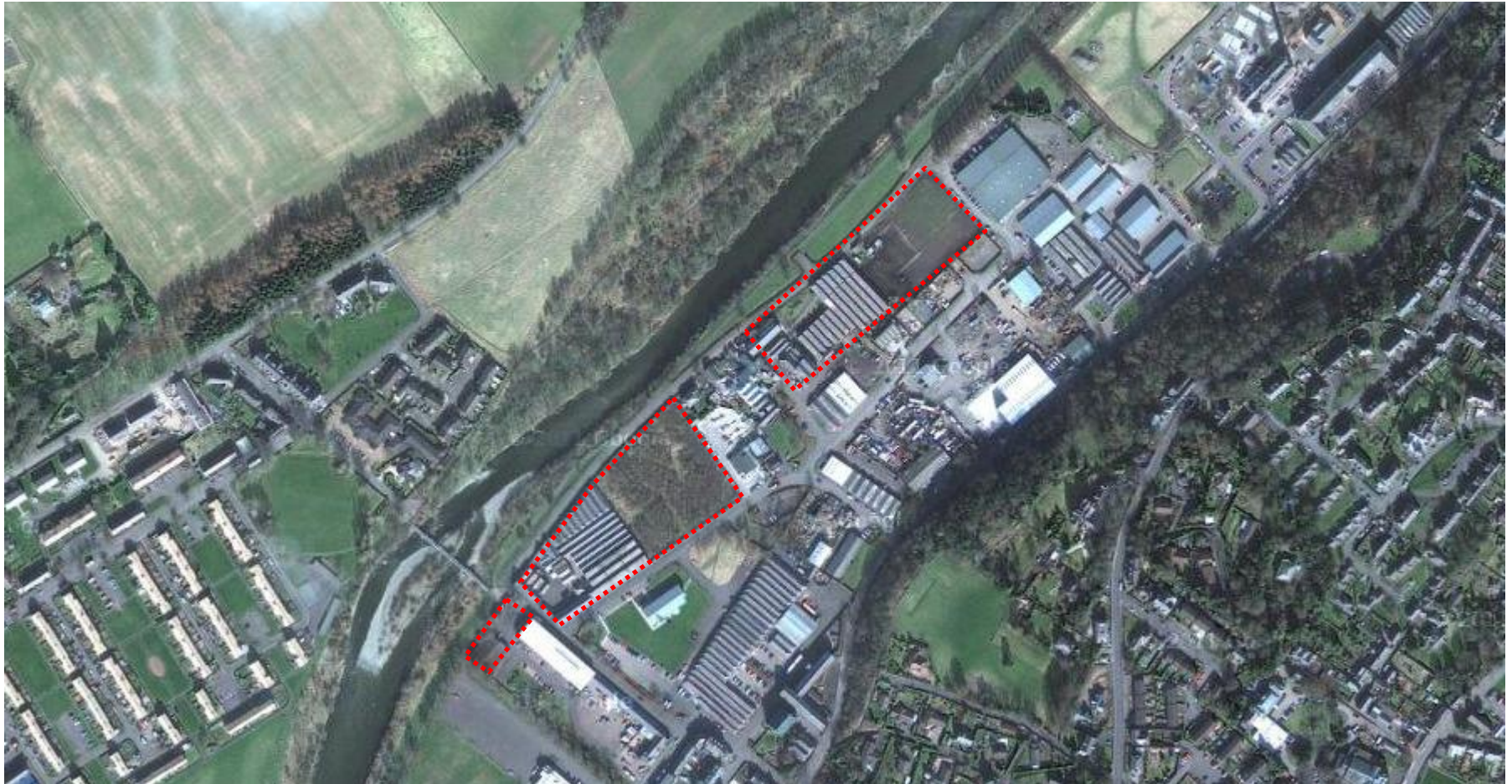
5.0 Flood Risk Information

6.0 Heritage Information

1.0 Site Location Plan



2.0 Aerial View of Sites

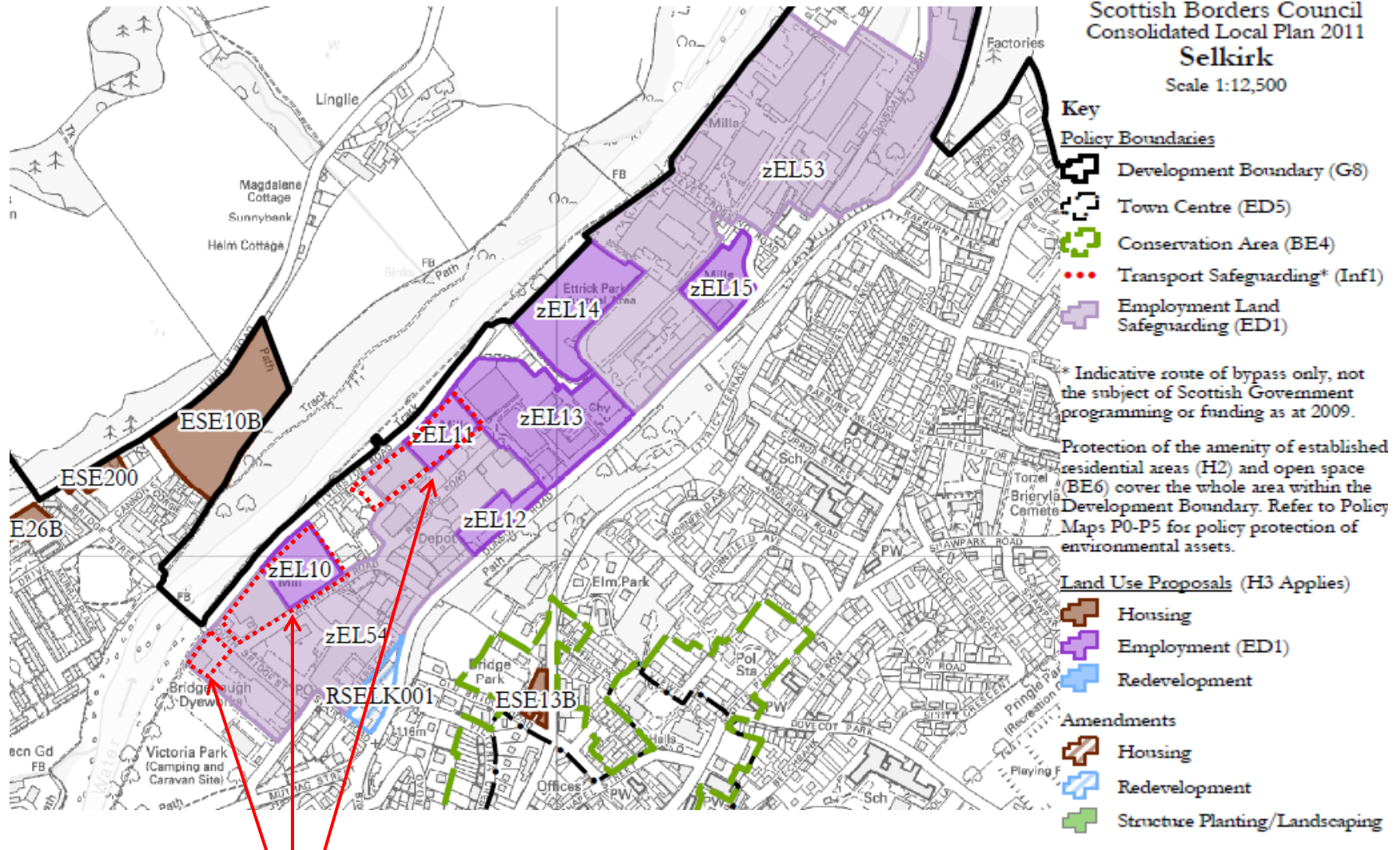


3.0 Site Photographs



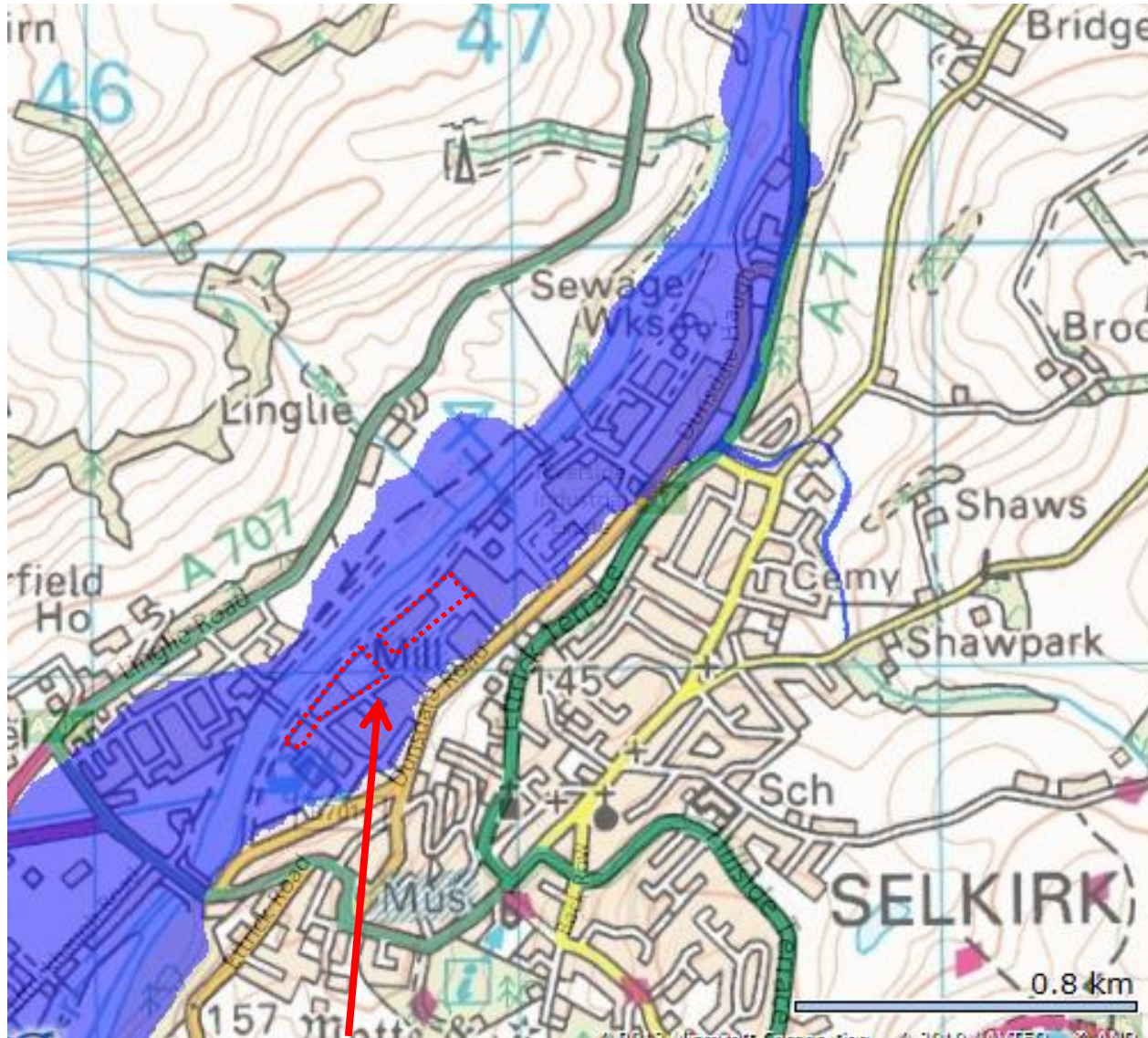
4.0 Extract from Adopted Local Plan

Scottish Borders Council
Consolidated Local Plan 2011
Selkirk
Scale 1:12,500



EWM SITES – currently allocated as employment sites and proposals (Policy ED1)

5.0 Flood Risk Information (extract from SEPA Flood Map)



EWM SITES

Legend

INDICATIVE FLOOD MAP

- Areas at risk of flooding from rivers
- Areas at risk of flooding from the sea
- Areas at risk of flooding from both rivers and the sea

FLOOD DEFENCES

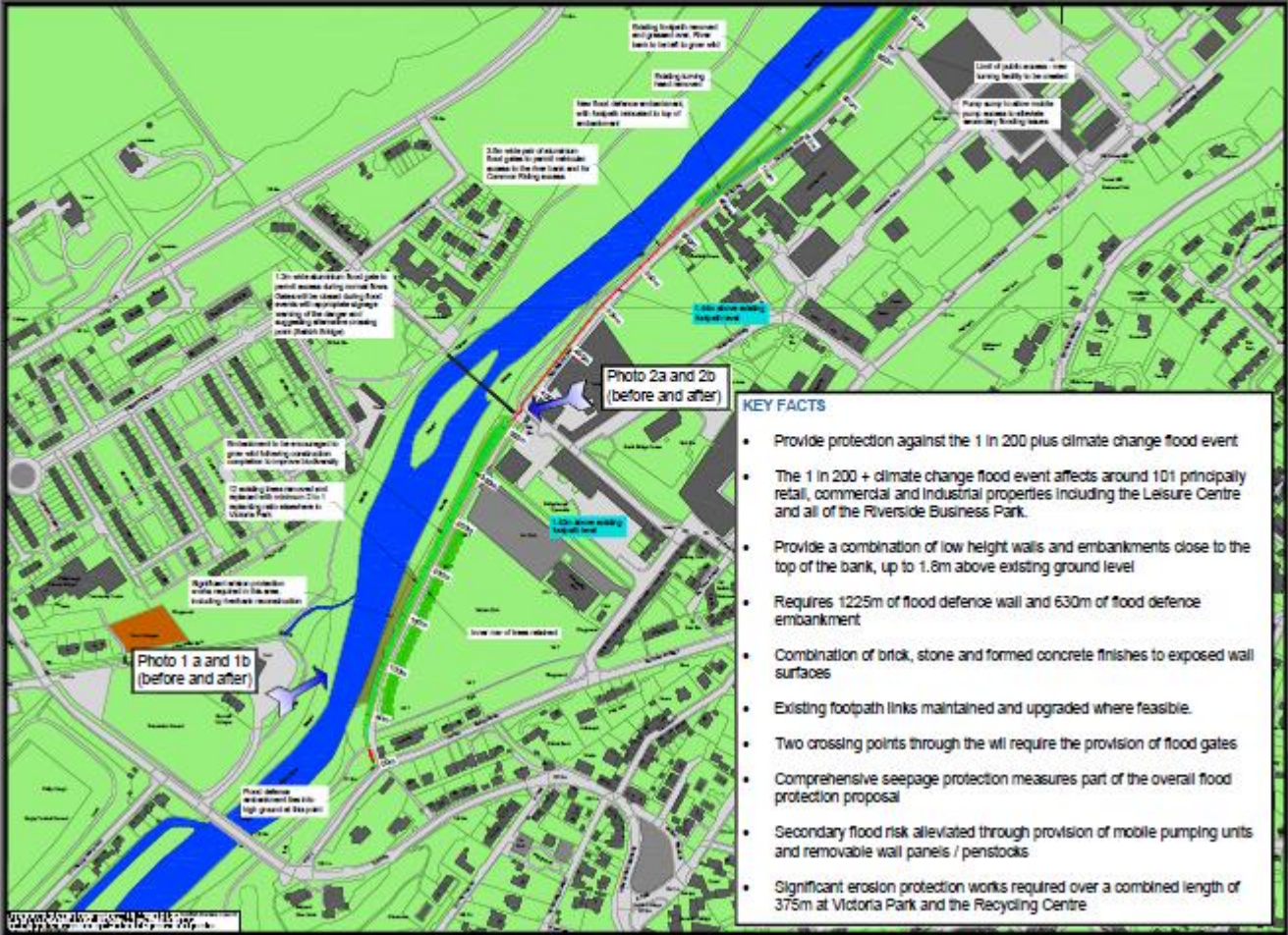
- 44 Defence scheme ref no. and location
- Embankment
- Wall
- Culvert
- Floodgate
- Storage area
- Pump
- Channel
- Improvement Area benefiting from flood defence relative to the scheme's standard of protection

5.0 Flood Risk Information (Selkirk FPS)

selkirk flood protection scheme



Riverside Defences



5.0 Flood Risk Information (Selkirk FPS)



Photo 1a Existing



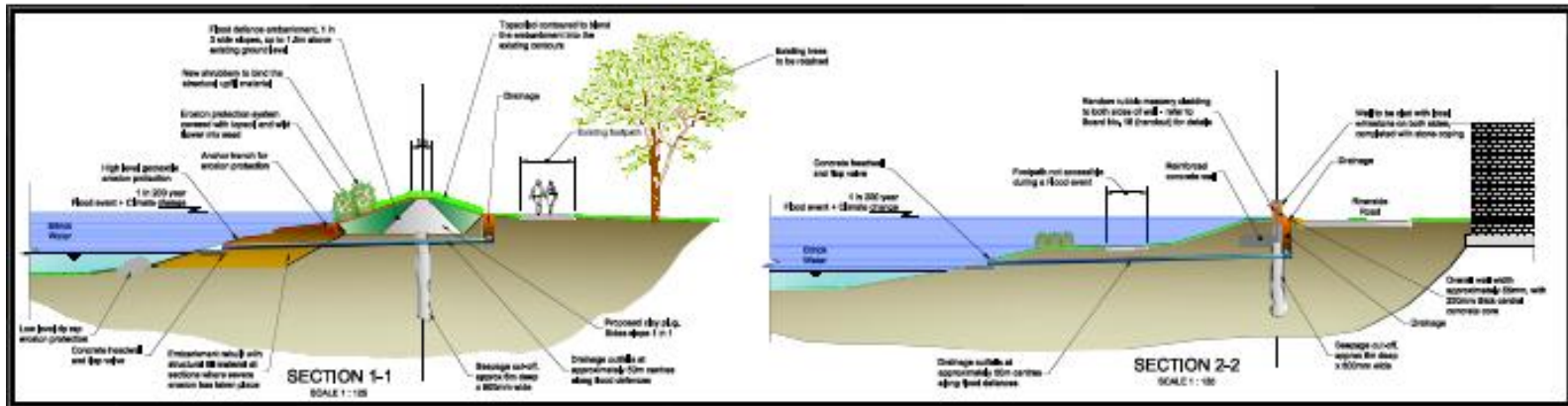
Photo 1b Proposed



Photo 2a Existing



Photo 2b Proposed



Typical Sections

BOARD No.7

6.0 Heritage Information

Available Map Layers

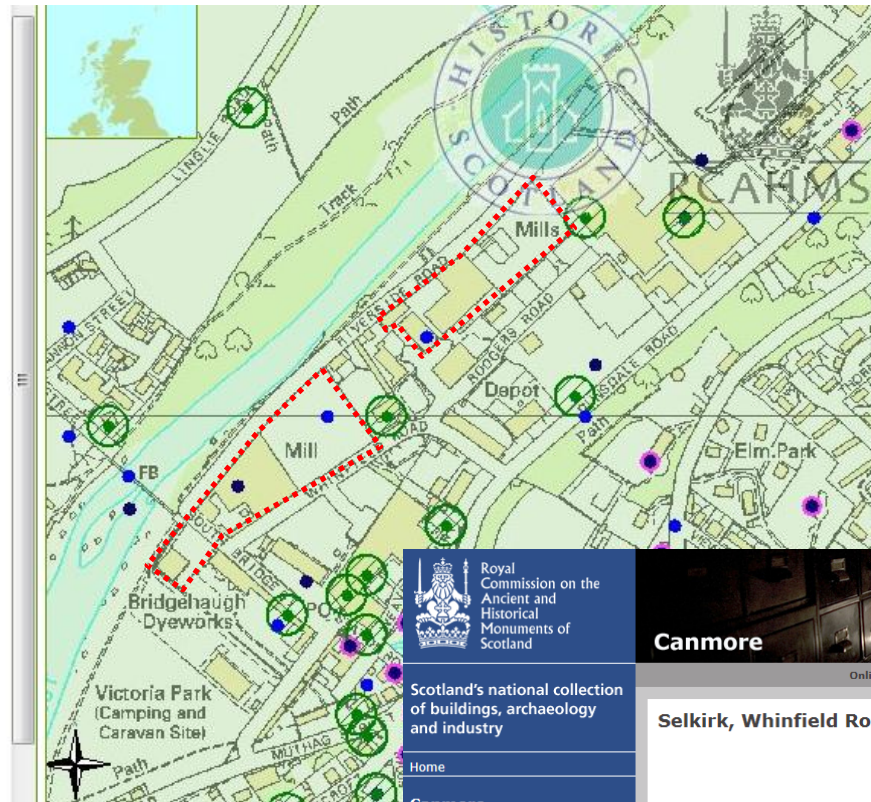
- 
Scheduled Monuments
 - < 1:50000
 - > 1:50000

- 
Listed Buildings
 - 1m Precision

- 
National Monuments Record of Scotland
 - 10km Precision
 - 1km Precision
 - 100m Precision
 - 10m Precision
 - 1m Precision

- 
Scottish Sites and Monuments Records
 - > 1:25000
 - > 1:250000

- 
Gardens and Designed Landscapes
 - < 1:50000
 - > 1:50000



 Royal Commission on the Ancient and Historical Monuments of Scotland

Scotland's national collection of buildings, archaeology and industry

Home

Canmore

Search

Advanced Search

MyCanmore

Thesaurus

Canmore Mapping

Register

Login

Resources

Search Resources

Visit Our Search Room

Buy Images and Data

RCAHMS Publications

Canmore

Online items only Type Here

Search

Selkirk, Whinfield Road, Whinfield Mill

© Copyright and database right 2011. All rights reserved. Ordnance Survey Licence number 100020548.

Alternative Names Riverside Mill (Whinfield); Brown And Allan; Heather Mills Company

Site type [SPINNING MILL](#)

Canmore ID 176556

Site Number NT42NE 113

NGR NT 4674 2908

Council SCOTTISH BORDERS, THE

Parish SELKIRK

Former Region BORDERS

Former District ETRICK AND LAUDERDALE

Former County SELKIRKSHIRE

[View this site on a map](#)

Collection Items

Search Room

Photographs 10

Public Contributions

Add some text

Photos [\(Add More\)](#) 2