

Johnston, Charles

From: Callum Fraser [REDACTED]
Sent: 03 March 2014 15:31
To: localplan
Subject: Scottish Borders Local Development Plan
Attachments: CWP LDP Submission 03.03.14.pdf; CWP Indicative Masterplan 03.03.14.pdf

Dear Sirs

Please find attached representations in response to the Proposed LDP, made on behalf of CWP.

The representations relate to a 37ha landholding located to the south of Newtown Saint Boswells.

I would be grateful if you could confirm receipt.

Yours faithfully

Callum Fraser MRTPI
Director

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Town Planning and Development Consultants

Scottish Borders Council
Forward Planning
Council Headquarters
Newtown St Boswells
Melrose
TD6 0SA

3rd March 2014

Our ref: CWPR003

Your ref:

Dear Sir,

PROPOSED LOCAL DEVELOPMENT PLAN LAND SOUTH OF NEWTOWN ST BOSWELLS

The following representations have been prepared on behalf of CWP in respect of a 37 hectare landholding located to the south of the existing settlement of Newtown St Boswells and forming an extension to the southern section of the Newtown Expansion Area (Site Ref: ANEWT005).

The Proposed Local Development Plan (LDP) identifies the Newtown Expansion Area for the development of 900 houses – continuing the allocation contained within the Consolidated Local Plan (adopted 2010).

In February 2010, an application for outline planning permission (09/01005/OUT) relating to the *“Erection of 900 dwellinghouses including associated infrastructure, highway works, ancillary works and landscaping”* obtained ‘minded to grant planning permission’ subject to a S.75 legal agreement relating to various matters including affordable housing, education provision and contributions towards the Borders Rail Project. In this respect, CWP can confirm that the S.75 heads of terms are close to being finalised.

CWP is fully supportive of the settlement expansion proposals contained within the Proposed LDP, and this representation seeks to extend the allocation southwards by an additional 37 hectares. The proposed area of extension is highlighted on the attached plan.

The proposed extension is justified on the following basis:

Site Specific Issues

The area proposed for development will extend from the existing southern boundary of the currently allocated land (Site Ref: ANEWT005) to the Selkirk Road (A699). The land comprises 37 hectares of gently sloping farmland, two disused railway lines running from north to south dissect the site.

Development of the site would adopt and continue the previously established design parameters of creating housing zones between existing and proposed landscaped areas.

The indicative site masterplan (attached) proposes the location of a substantial tree belt along the site's southern boundary (to the A699) including at the south-east boundary i.e. the location within closest proximity to the village of St Boswells. The proposed tree belt will be approximately 40 metres wide and provide a green link with existing tree belts in the locality. It will create a visual barrier to the development, and provide for enhanced leisure/recreation opportunities via the creation of woodland walkways and cycle paths. Additional landscape 'pockets' will be provided throughout the development, enhancing site identity and character and increasing amenity levels for the residents of the proposed housing.

The existing allocated land is accessed from both the proposed new junction on the A68, and directly from Newtown St Boswells. The intention is to create a primary route through the site from these two points that will connect directly to the A699, offering residents of the proposed Newtown Expansion Area significantly enhanced access to the surrounding road network.

The proposed extension to the planned Newtown Expansion Area offers indicative development capacity for circa 500 – 700 homes.

Locational Issues

Newtown St Boswells is located within the Central Borders Strategic Development Area (SDA), as defined by SESplan. The Central Borders SDA contains the largest settlements in the Borders, and the greatest concentration of local services and facilities. It has been identified as having capacity for further development in addition to that already identified in the approved development plan.

The Proposed LDP Spatial Strategy places significant emphasis on the role of the Central Borders SDA as the primary focus for growth – and makes clear that the Western and Eastern SDAs perform "secondary roles" to the Central SDA within the spatial strategy.

Newtown St Boswells is centrally located within the SDA and the settlement is highly accessible, both in terms of existing road connections and the Borders Railway line.

The expansion of Newtown St Boswells is recognised by Scottish Borders Council as the best long term solution in terms of its role in helping to meet the housing requirement emerging from SESplan and addressing development pressures within Central Borders.

The Council's basis for adopting this position is in recognition that incremental additions to existing settlements would be unlikely to provide either the quantity of land required to meet the housing land requirement or the most suitable sites for development.

The Council's acceptance and support for the principle of development to the south of Newtown St Boswells is clearly demonstrated by the allocations within both the Consolidated Local Plan (2010) and Proposed Local Development Plan, as well as the minded to grant planning permission for the erection of 900 dwellinghouses (09/01005/OUT).

Given this background, it is appropriate that all reasonable and necessary steps aimed at securing the timely and comprehensive delivery of the Newtown Expansion Area development

should be taken. The extension of the southern section of the expansion area will help create the critical mass of development that will secure the key infrastructure required to support the development.

Meeting the Housing Land Requirement

Appendix 2 of the Proposed LDP provides the background to the housing land requirement within the LDP and details the allocations contained within the Proposed Plan to meet the identified housing need.

The context for the Proposed LDP's approach to meeting the housing land requirement is provided by the approved SESplan SDP. Approved SESplan was based upon the 2011 Housing Needs & Demand Assessment and the 2010 Housing Land Audit

However, subsequent to the approval of SESplan, draft Supplementary Guidance (SG) on Housing Land has been published. The purpose of the SG is to provide detailed further information for Local Development Plans as to how much of the housing land requirement for the periods 2009 – 2019 and 2019 - 2024 should be met in each Council area.

The Draft SG instructs Local Development Plans to *“allocate sufficient land which is capable of becoming effective and delivering the scale of the housing requirements for each period”*.

This submission is made on the basis that the SG will be approved in its current form, and this will provide Scottish Borders with a significantly larger housing requirement for the period in question.

A comparison between the Proposed LDP Housing Requirement and that provided by the SG is set out within the table below:

	Proposed LDP	SESplan SG
2009 – 2019	5958	9650
2019 - 2024	2780	3280
Total	8738	12930

Account must also be taken of emerging Scottish Planning Policy in terms of providing a generous supply of sites. This states that the housing allocations in LDPs will need to provide a margin of 10-20% over and above the housing land requirement (draft SPP, para 85).

The table below shows how this flexibility requirement has the effect of increasing the number of houses for which sites will have to be allocated in the LDP

	SESplan SG	+ 10%	+ 20%
2009 – 2019	9650	10615	11580
2019 – 2024	3280	3608	3936
Total	12930	14223	15516

To comply with the terms of the emerging SESplan SG and Scottish Planning Policy the Proposed LDP should, as a minimum, allocate land capable of meeting a housing requirement of **14,223**

for the period 2009 to 2024 – **10,615 houses in the period 2009-2019 and 3608 houses in the period 2019 – 2024.**

Regarding the supply of housing land, Proposed LDP Appendix 2 presents the findings of the 2012 Housing Land Audit undertaken by Scottish Borders Council within Tables 1 and 2. These tables reflect the terms of Table 3.6 contained within the SG Technical Note as presented below:

	2009-2019	2019-2024
Effective Land Supply	5779	883
Constrained Sites	1595	1139
Windfall	1169	730
Completions 2009-2012	1243	0
Demolitions	140	100
Total	9646	2652

The Proposed LDP presents the above as the Established Housing Supply but does so in the context of seeking to meet a Housing Land Requirement of 8738 houses for the period 2009-2024 (as set by approved SESplan) with the identified ‘constrained’ sites providing added flexibility to the supply.

Proposed LDP Appendix 2 Tables 5 and 6 provide details of the New Sites to be allocated by the LDP – 15 sites with indicative capacity of 630 houses. These have been provided both within and outwith SDAs as instructed by SG Table 3.2 – again, the Proposed LDP considers these allocations will provide added flexibility to the established supply.

Given the terms of the SESplan SG and the emerging SPP requirement for 10-20% flexibility it is clear that a large number of additional ‘new’ sites need to be identified by the Proposed LDP.

Moreover, we note that only around 66% of the 2009 – 2019 housing requirement is proposed to be met from effective sites. The balance of the established supply presented by the Proposed LDP is intended to be provided by ‘constrained’ and ‘windfall’ sites.

In our view, there is no basis to place any reliance on the delivery of constrained sites in the first 5 years of the LDP – by definition these sites are not effective and any such reliance is contrary to the SESplan and Scottish Planning Policy.

Table 3.6 within the SESplan Technical Note identifies 1595 houses on constrained sites in the period 2009-19 – none of these should be counted towards meeting the housing requirement, therefore the associated need for additional ‘new’ sites needs to be increased by the same amount.

Regarding ‘windfall’ sites, SESplan Policy 5 states that *“Subject to any justifiable allowances for anticipated house completions from ‘windfall’ sites, and for demolitions of existing housing stock, Local Development Plans will allocate sufficient land which is capable of becoming effective and delivering the scale of the housing requirements for each period, which will be confirmed in the supplementary guidance”*.

We believe that the reliance on 'windfall' sites during the period 2009-19 (1169 homes) is over optimistic and leaves little room for flexibility.

It is considered that the Proposed LDP's approach to meeting the Housing Land Requirement contains a number of fundamental flaws, as follows:

- The housing requirement is too low as it does not take account of SESplan Supplementary Guidance;
- The number of housing sites allocated is too few because no flexibility is provided, as required by Scottish Planning Policy;
- The number of housing sites allocated is too few because the Proposed LDP is wrongly counting constrained sites as making a contribution to the supply of housing in the first few years of the plan;
- The number of housing sites allocated is too few because there is an over-reliance on windfall sites.

It is essential that additional housing land which is effective, or capable of becoming effective, within appropriate timescales is identified otherwise the Proposed LDP will not conform to SESplan Supplementary Guidance and Scottish Planning Policy.

Summary / Conclusion

For the reasons presented it is considered that the proposed extension to the Newtown Expansion Area is justified.

There is an essential requirement for the Proposed LDP to identify additional housing land if the housing requirement is to be met, and if the Proposed LDP is to conform to SESplan Supplementary Guidance and Scottish Planning Policy.

The Central Borders SDA is the primary focus for growth within the Scottish Borders and offers capacity for additional development.

Given Newtown St Boswell's highly accessible location within the Central Borders SDA and the Council's established support for settlement expansion at this location, the allocation of the 37 hectare landholding for housing represents a clear and appropriate opportunity to help address the substantial shortfall in the Scottish Borders housing land supply.

Yours faithfully,



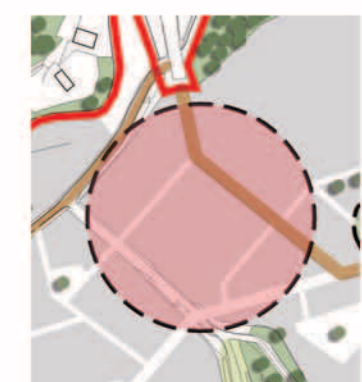
Callum Fraser
Director

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Scale of Metres - 1:2500

Legend



Key nodal points



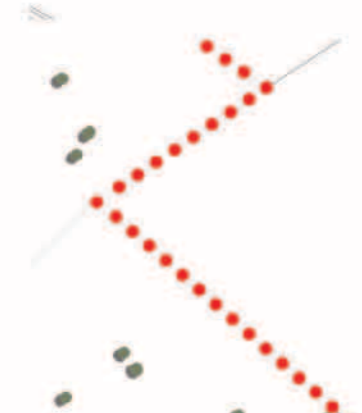
Proposed Green Spaces



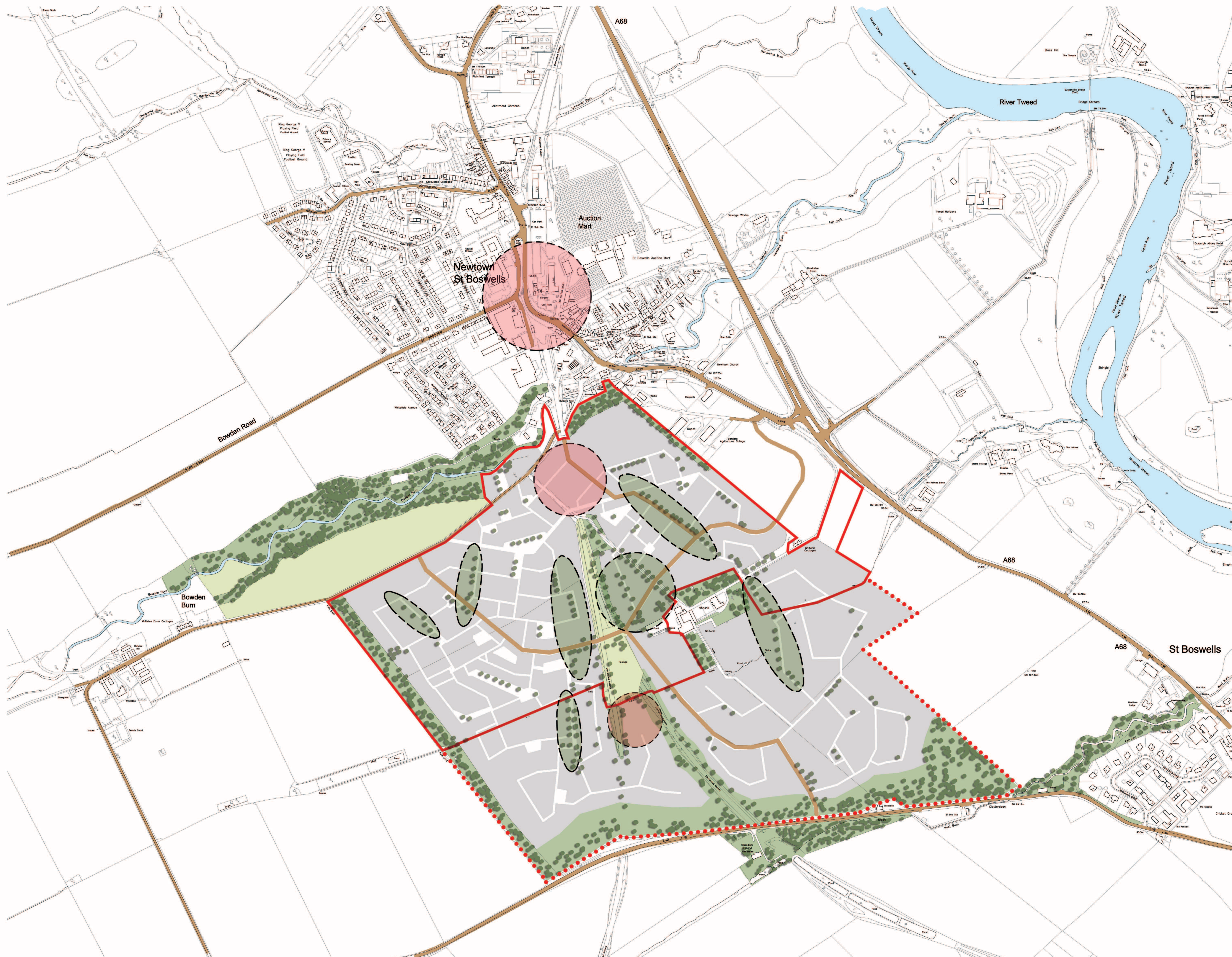
Development Areas



Tree Belts



Additional Land



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Client	CWP		
Project	Newtown St Boswells		
Drawing Title	Indicative Expansion Plan		
Date	FEB 2014	Scale	1:2500 @ A0 Drawn
Issue Status	Feasibility		
Drawing No.	1978 104	Rev.	

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All dimensions and levels to be checked on site and the architect to be informed of any discrepancies prior to the commencement of work. Unspecified dimensions are not to be added off the drawing. All dimensions are to indicate unless otherwise specified. Any dimensions in circles shall prevail over those in rectangles.