

Hill, Laura (Planning HQ)

---

**From:** Szumelukowa Krystyna [REDACTED]  
**Sent:** 02 March 2014 13:12  
**To:** localplan  
**Subject:** fao Martin Wanless : Scottish Borders Local Development Plan; Proposed Plan  
**Attachments:** Scottish Borders LDP Comments .docx; ATT00001.htm; Venlaw Location; ATT00002.htm

Dear Martin,

For consideration by Scottish Borders Council I attach a statement and location plan in response to the current consultation on the proposed Local Development Plan.

I look forward to receiving an acknowledgement.

Yours sincerely,

Krystyna Szumelukowa  
for Sidon Ventures Ltd

## **Scottish Borders Council: Proposed Local Development Plan March 2014**

**Comments to:**

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

**From:**

**Krystyna Szumelukowa  
On behalf of Sidon Ventures Ltd  
13/3 Rothesay Terrace  
Edinburgh  
EH3 7RY**

### **Settlement Profiles and Maps: 10.67 Peebles**

- 1. It is proposed that the local development plan boundary for Peebles should be extended to include part of Venlaw Hill.** A site plan is attached which outlines in red land which is in the ownership of Sidon Ventures Ltd and which is recommended for inclusion within an extended local development plan boundary.
2. The site is located on the northern edge of Peebles on the east side of the A703 (Edinburgh Road), approximately 1 km north of the town centre. The land is currently used for rough grazing. The site is bounded to the north and east by woodland; a culverted burn; and a private access road leading to Venlaw Farm, the Castle Venlaw Hotel and a number of private houses. To the west the site boundary comprises a line of chalet bungalows fronting onto the Edinburgh Road and opposite the more substantially developed northwestern sector of Peebles.
3. Within the site there are a number of single mature trees and an area of historic cultivation terraces. The northeastern upper part of the site is relatively level from 215m to 195m but the land then falls away from 195m to 175m to the rear boundaries of the properties facing Edinburgh Road. Current access is through a gate onto the Edinburgh Road alongside 64 Edinburgh Road.
4. The current local plan development boundary sits tightly alongside the back gardens of the properties facing onto Edinburgh Road and then continues beyond the site to the north.

5. There is a discrepancy between the profile of Peebles as a settlement and its assessment under the heading of “place making considerations” and the map, which does not show the boundary of the settlement as a “place,” but rather an inner line within the settlement overtly drawn in the north eastern sector.

6. The proposed extension would be a logical extension to the built up area of Peebles as it is already in part bounded by diverse residential and hotel development, opposite residential and commercial uses and within easy reach of the town centre. The site itself would be a minor addition to the size of the settlement, being just 7.1 hectares in total. It would not prejudice the character, visual cohesion or natural built up edge of the settlement as it is already surrounded by mixed development and fringe woodland. It does not contribute to the sense of arrival in Peebles on arriving from the north, as it does not become immediately visible from the Edinburgh Road. Similarly it is not readily visible from the Edinburgh Road when leaving the town.

7. Its relationship with the Eddleston Valley would not change. The extension of the local plan boundary would not alter the landscape framework of Venlaw Hill as the site nestles into the lower slopes. A sense of enclosure to the settlement of Peebles is given by the wider landscape setting rather than wholly by this enclosed site alone.

8. It sits within the local neighbourhood as part of Peebles. The Post Office knows that the properties around the site are all in EH45. Residents and businesses on the “other” side of the local development plan boundary know that they live in Peebles.

9. **Future development proposals for the site should be assessed in terms of Policy PMD5: Infill Development rather than Policy PMD4: Development Outwith Development Boundaries.** The site and immediate neighbourhood offers the opportunity for development commensurate with improved woodland management; the replacement of field and parkland trees; the protection of historic cultivation terraces; and the improvement of access through to the town centre. Its current designation within Policy PMD4 limits the possibility of enhancement and contributes to gradual degradation.

### **An opportunity for quality homes in Peebles**

10. The continuing SESplan housing review has been taken into account but is not yet complete, being co-dependent on the outcome of this consultation process for the proposed Local Development Plan. The policy direction for housing in terms of land requirements, flexibility and affordable housing as **set out in 1.14** is not yet translated into the determination of housing allocations having being deferred for a year from 27 June 2013. The protracted process itself reinforces the complexity of detailing housing allocations across SESplan, Local Development Plan areas, Strategic Development Areas, settlements and within rural areas at a time when population and household numbers are predicted to grow by 15% and 23% respectively in the Scottish Borders but where house building has been in recession. **Appendix 11.2.3 Meeting the Housing Land Requirement** confirms that in the period 2008-2012 the rate of completions in the Scottish Borders fell by 60%.

11. **Section 3.6 of the LDP Consultation says “the provision of a generous supply of land for housing is a core ingredient of the Plan. There is currently a generous supply of land already identified through the plan process, and there **will be a need to augment this in line with the SESplan.** The Plan will also seek to encourage the delivery of affordable housing opportunities to help meet local need. The current economic downturn does, however, present **severe challenges to the delivery of new housing by the development industry”.****

12. It is recognized that the delivery of housing does not necessarily conform to the expectation of specific housing allocations and there should be sufficient flexibility to vary allocations/bring forward sites/respond to development opportunities provided that they provide the type and quality of housing that will meet need and demand. **In Appendix 11.2.9 Windfall Sites** are shown to make a significant contribution to housing supply with 46% of all completions in the years 2008-2012. It is calculated that 1750 units will be similarly developed during 2012-2024. Windfall sites generally are infill sites, which have not been identified in the plan making process.

13. **The LPD Aim in 3.10 to provide a generous supply of land for mainstream and affordable housing is welcomed** as this would mitigate concerns over the capability of the housing industry in its widest sense to provide quality homes in desired locations. **It makes sense, as stated in 3.14 that development should be focused on the extension of the main towns in the SDAs.** Peebles is part of the western SDA as identified in SESplan.

14. The site at Venlaw would currently be considered as a windfall site but as contended above it is in reality a site within the settlement of Peebles and the Local Plan Development boundary should be redrawn to encompass the site and its hinterland of residences and businesses.

15. **This would recognize that the site would then be considered as an infill site and It is further proposed that it should be allocated for residential development as a contribution in future to meeting the demand for family housing within the settlement of Peebles and within the existing urban infrastructure.** A range of house types, including affordable homes could be accommodated within the site. It is visually contained and its setting can be enhanced by additional landscaping which would also protect the historic cultivation terraces, thereby respecting the key principles of the original Scottish Borders Development and Landscape Study of 2007. The Service Statement for Planning and Development published by Scottish Natural Heritage in June 2012 has subsequently given guidance on sites they would consider to be of strategic landscape importance, which would not include this part of Venlaw Hill.

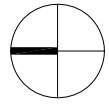
16. An added benefit of the development of this site would be the opportunity for the improvement of the management of the surrounding sinuous woodland which fronts onto either side of the access road as far as the Castle Venlaw Hotel and potentially the road itself in co-operation with local residents and businesses to provide a safer access and the improved management of surface water run-off.

17. The site has the advantage of being located in North Peebles and therefore not subject to the constraint of the need for a second vehicle crossing over the River Tweed. **There is no provision within the proposed LDP, which gives priority to the construction of a second River Tweed crossing within the plan period.** The proposed LDP however includes within its potential longer term housing allocations SPEEB003 (4.5hectares), SPEEB004 (2.9 hectares), and SPEEB005 (32.3 hectares of mixed uses including housing) which are all located south of the River Tweed and qualified by the requirement for a new bridge linking north and south of the River Tweed.

18. The additional allocation in Peebles for the plan period is 75 units on 2 sites (APEEB021 south of South Park for 50 units and APEEB041 Violet Bank II for 25 units). However, as the sites of SPEEB003/4/5 are constrained by the need for a new bridge across the River Tweed the flexibility which both SESplan and the proposed Local Development Plan accepts is required is inevitably compromised.

19. Taking into account rising population and housing numbers, the need for affordable housing, and quality of the built and natural environment, this site offers an opportunity to demonstrate a more realistic and flexible approach to housing availability and the forecast of housing units up to 2024 and beyond, at a time of challenge for the house building industry in its widest sense.

20. The above is submitted for consideration by Scottish Borders Council. An opportunity to make a joint visit to the site at Venlaw Hill would be welcomed as a contribution to the assessment process.



LEGEND

— site boundary

Revision Description:



Ordnance Survey, (c) Crown Copyright 2014. All rights reserved. Licence number 100022432