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2nd March 2014
Delivered by Email

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

Our Ref. CWP1

Dear Sir/Madam

**REPRESENTATION TO THE SCOTTISH BORDERS LOCAL DEVELOPMENT PLAN,
PROPOSED PLAN**

CAERLEE MILL, INNERLEITHEN

We write on behalf of our client Calder Weir Properties (CWP) who have recently acquired Caerlee Mill, Innerleithen.

CWP would like to take this opportunity to make representations to the proposed Local Development Plan (LDP) and regarding the future redevelopment aspirations for the site. The background to the site is outlined below together with CWP's recommendations / modifications to the Proposed Pan.

Site Background

The Mill site is situated on Chapel Street, Innerleithen and extends to approximately 1.5 hectares. A site plan is provided within **Attachment 1**. The Mill was constructed in 1788 by Alexander Brodie and has been subsequently added to in a piecemeal fashion over the 19th and 20th century. Many of the buildings are Category B Listed but with differing degrees of significance in terms of architectural or historical merit.

The Mill was occupied by JJ & HB Cashmere Mills Limited until January 2010 when the financial cost of running such a significant textile mill and in the face of increasing global competition resulted in its closure. No related or suitable alternative use has been found since the Mills closure.

The site is centrally located within Innerleithen and within a short walk of the Town Centre. It is ideally located to take advantage of local facilities and infrastructure and meets sustainable development principles.

Caerlee Mill Site Planning Brief

In order to provide a catalyst to the redevelopment of the Caerlee Mill site the Council proactively commissioned a number of studies and prepared a Planning Brief for the site.

The Caerlee Mill Site Planning Brief was adopted as Supplementary Planning Guidance (SPG) by the Council in August 2011. The purpose of the SPG is to act as a stimulus for development, providing guidance and a degree of assurance to any prospective new owner on the preferred way forward. In preparing the SPG Scottish Borders Council recognised that:

- the site is vacant brownfield land with no specific land allocation;
- there is generally no demand for previous uses particularly given the scale of site/buildings;
- the building is limited in terms of modern standards;
- both the building and site has problems in relation to its layout, space standards, energy use and vehicle access; and
- the Listed Building status together with the location within the Innerleithen Conservation area adds further risk and uncertainty to the redevelopment of the site.

To further assist redevelopment, the Council have now obtained permission to demolish a significant number of the buildings on site. Refer to **Attachment 2**.

CWP Properties Proposal

CWP have recently acquired the Mill site, hence why they did not submit representations to the Main Issues Report consultation in June 2012. Given the critical importance of the regeneration of the site, CWP now submit representations in this regard. Ultimately the site represents a unique opportunity for an exemplar redevelopment of a historic Scottish mill whilst at the same time redeveloping the wider brownfield site for high quality residential dwellings.

The project team are currently going through the pre-application and development optioneering process. The proposed scheme will seek to retain key Listed Buildings on site whilst demolishing and redeveloping the less significant buildings/land for residential dwellings.

Housing Opportunity

Overview

The scale of housing required for the Scottish Borders area has been set out by the SESPlan Strategic Development Plan (June 2013). SESPlan identifies Innerleithen within the Western Borders Strategic Development Area (SDA). The housing allocation for this SDA is for 1,000 units from 2009 – 2024.

This represents a small allocation when compared to SDA's of a relatively similar scale and purpose, for example the A701 Corridor SDA has 1,600 units. In our opinion the allocation of 1,000 units in the Western SDA is an underestimation of the likely housing needs to 2024. We therefore consider there is a need for a review of this allocation in accordance with SESPlan Policy 6 Housing Land Flexibility.

Scottish Borders Local Development Plan (2013) 'Proposed Plan'

The Proposed Plan provides three housing allocations (a total of 205 units) within the Innerleithen Settlement Profile and Plan, all carried forward from the consolidated Local Plan.

Two of these allocations are located to the north of the settlement off Leithen Road and the third is off the Peebles Road:

- Kirklands/Willowbank (site TI200) – indicative site capacity 55 units;
- Peebles Road (TI3B) - indicative site capacity 5 units; and
- Kirklands/Willowbank II (site AINNE004) – indicative site capacity 150 units.

In addition to the sites outlined above, a Potential Longer Term Housing site, Kirklands II (site SINNE001), is also included within the Settlement Profile and Settlement Plan. Notably, this 7.6ha is situated outside of the Innerleithen Development Boundary and will be subject to further assessment and review as part of the next Local Development Plan Review.

The identification of a site (site SINNE001) to the north of the town outside the Innerleithen Development Boundary indicates that the Council recognise there is a degree of pressure to accommodate further housing within Innerleithen.

In general terms we have concern that set housing requirements are not being met in full. This can be seen in the current (average) build out rate in the Scottish Borders (Appendix 2-Table 4 -503 dwellings per year). If taken over the identified ten year period between 2009-2019 this equates to some 5,030 dwellings. This is 928 dwellings below the required target of 5,958.

There is therefore a need for greater flexibility in the system by allocating more sites that stand a better chance in coming forward over the set time period. This position is further confirmed when reviewing Appendix 2 - Table 3 which shows that of the housing completed in the Scottish Borders over the last 5 years 41-54% have been windfall sites.

Caerlee Mill Site – Housing Potential

Sites within the Development Boundary that are sustainably located and brownfield should be considered superior to those that are greenfield.

The residential-led regeneration of the Caerlee Mill site would enable development within the current Development Boundary and within a short time period. **Table 1** below considers the potential of Caerlee Mill for housing in comparison to the existing sites in the Proposed Plan.

Table 1: Comparison of potential housing sites

Potential land for residential development in Innerleithen	Capacity (units)	Brownfield site	Within Innerleithen Development Boundary
Caerlee Mill	50	✓	✓
Kirklands/Willowbank (site TI200)	55	✗	✓
Peebles Road (TI3B)	5	✗	✓
Kirklands/Willowbank II (site AINNE004)	150	✗	✓
Kirklands II (site SINNE001)	205	✗	✗

Strategic Planning Aims

The re-use of the site for housing-led regeneration could therefore provide greater certainty or chance in meeting housing targets outlined by SESPlan.

Recommendation:			
CWP's Caerlee Mill site provides a centrally located, brownfield site that can contribute to the provision of additional housing units (up to 50) within the settlement boundary.			
Proposed Modification:			
<i>Innerleithen Settlement Profile - Housing Table</i>			
To include CWP Properties Caerlee Mill site within the Innerleithen Settlement Profile as follows:			
Housing			
Site Reference	Site Name	Site Size (ha)	Indicative Site Capacity
	Caerlee Mill	1.5	50
Site Requirements			
<ul style="list-style-type: none">Refer to approved Planning Brief			
<i>Innerleithen Settlement Profile - Settlement Map</i>			
Include CWP's Caerlee Mill site in the Settlement Map for housing-led regeneration. This will include the consideration of other suitable uses within the retained listed buildings.			

Regeneration Opportunity

Scottish Planning Policy (February 2010)

We recognise the importance that Scottish Planning Policy (SPP) places on the regeneration of sites to support economic development and attracting investment to an area. Specifically paragraph 45 of SPP states:

"The planning system should support economic development in all areas by:

.....promoting regeneration and the full and appropriate use of land, buildings and infrastructure,...." (paragraph 45)

SPP requires planning authorities to promote and support opportunities for regeneration and the development of brownfield sites in order to attract investment into an area, it states:

"Planning authorities should therefore ensure that new development safeguards and enhances an area's environmental quality and, where relevant, should promote and support opportunities for environmental enhancement and regeneration.

Previously developed land (also referred to as brownfield land) is a potential source of sites for new development and planning authorities should support and promote proposals to bring vacant or derelict land back into productive use for development or to create more attractive environments." (paragraph 48)

In terms of the historic environment, paragraph 110 of SPP recognises the importance of the historic environment to regeneration:

"The historic environment is a key part of Scotland's cultural heritage and it enhances national, regional and local distinctiveness, contributing to sustainable economic growth and regeneration."

Scottish Borders Local Development Plan (2013) 'Proposed Plan'

The Proposed Plan identifies Caerlee Mill as a Regeneration Opportunity in numerous sections, throughout the Plan.

Section 3 of the Proposed Plan, which contains the 'Vision, Aims and Spatial Strategy', refers specifically to the Mill site at Paragraph 3.25 stating:

"Regeneration opportunities are identified at Caerlee Mill in Innerleithen."

Policy ED5 (Regeneration) includes a table that identifies key sites and projects, stating that: *"the redevelopment of these sites will help make the Borders more attractive to residents, businesses, visitors and investors"* (paragraph 1.3). Caerlee Mill is included in this table (Ref. 10) as a Regeneration Opportunity.

The Proposed Plan comprises the Innerleithen Settlement Profile and Settlement Map. The preliminary text in the Innerleithen Settlement Profile refers to the Mill site as:

"a key potential regeneration opportunity exists to the north of the town centre at the Caerlee Mill".

Notwithstanding this, the Caerlee Mill site does not form part of the 'Development and Safeguarding Proposals' table nor is it identified within the Settlement Plan (zoned as 'White Land' located within the Conservation Area). We believe that this is a missed opportunity and at odds with the preliminary text within the Settlement Profile and other parts of the local plan.

We therefore propose the following recommendation/modification to the proposed plan:

Recommendation:
<p>The Proposed Plan identifies the Mill site as a Regeneration/Redevelopment Opportunity throughout various sections of the Plan. The Innerleithen Settlement Profile goes as far as to identify the site in the preliminary text as a <i>"key potential regeneration opportunity"</i>. However, this is not carried through and reflected in the Settlement Plan. Instead the site is zoned as 'White Land'. It is considered that this does not carry sufficient weight and allocating the site for residential-led regeneration/redevelopment would be a more suitable solution.</p> <p>CWP kindly seek the formal allocation of the Mill site for residential-led regeneration / redevelopment (with potential reuse of retained listed buildings for other compatible uses).</p>

Proposed Modification:

Innerleithen Settlement Profile - Settlement Map

Remove CWP's Caerlee Mill site from White Land in the Settlement Map and allocate the site for housing-led regeneration/redevelopment denoting a capacity of up to 50 units.

Reference should also be made to the Council's Caerlee Mill SPG and Listed Building Consent.

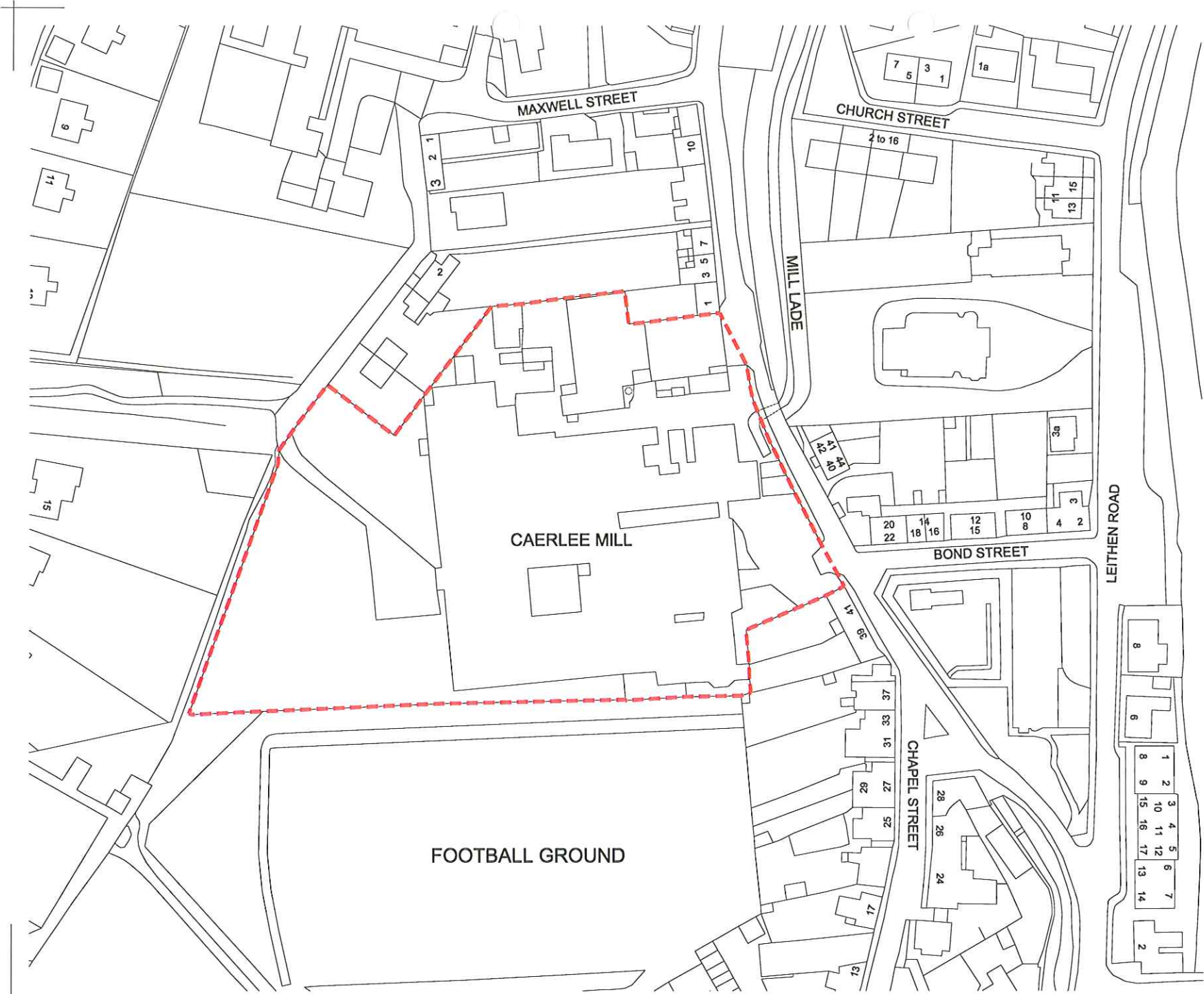
Conclusion

CWP are keen to bring the Mill site back into use while working with the Council to achieve the best outcomes. Given the significant level of momentum, it is considered appropriate for this to be fully recognised in the Proposed Plan and the site to be formally allocated as per our recommendations / modifications.

Should you require any further information or wish to discuss this representation in greater detail, please do not hesitate to contact Tim Ferguson [REDACTED]

FERGUSON PLANNING

Enc. Attachment 1 – Site Location Plan
Attachment 2 - Demolition Plan



LEGEND:

----- SITE BOUNDARY

○ CHIMNEY STACK

SITE AREA - 3.8 ACRES/1.5 HECTARES

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Client **CWP PROPERTIES**

Project **CAERLEE MILL
INNERLEITHEN**

Drawing Title **EXISTING SITE PLAN**

Date **FEB 2014** Scale **1:1000 @ A3** Drawn **CC**

Issue Status **SKETCH**

Drawing No. **2075 001** 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. Unapproved dimensions are not to be used for the building. All drawings are a preliminary unless otherwise specified. If any dimensions or levels conflict please notify the Architect immediately.

A1 Building Codes (to be read with Caerlee Mills Conservation Study)

Buildings to be retained

Demolition of buildings

Demolition of minor out-buildings

Building's outwith Caerlee LTD Ownership

Site Boundary



Job Title:
1035
Caerlee Mill

Drawing Title:

Site Plan

Drawing Number:
L(--)-102

Scale: 1:500 @ A3 Date: April 2011 Drawn: IT Reviewed: TG

Revisions:

Scottish Borders Council
Town And Country
Planning (Scotland) Act
1997

APPROVED

subject to the
requirements of the
associated Decision
Notice

