

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

28 January 2019

Dear Sir/Madam

Main Issues Report Issue 5: Planning for Housing, Question 7:

Objection: Coldstream, Hillview North 1 (phase 1) (ACOLD011) and Hillview North (Phase 2) (ACOLD014).

McGregor Farms wish to object to the inclusion of sites ACOLD011 and ACOLD014 at Coldstream within the Scottish Borders Local Development Plan 2 (LDP2). Both sites are identified for longer term housing potential and are located to the north-east of Coldstream town centre. Coldstream Mains farm is situated to the north of the two sites whilst an industrial site exists to the south-east.

Currently, the Council has allocated ACOLD011 (within the Housing Supplementary Guidance) and have proposed an alternative housing allocation within the Main Issues Report, site ACOLD014. If allocated, the alternative site will lie directly north of the ACOLD011. However our opinion is that both of the sites are not effective, desirable or deliverable for housing.

This submission states, in our opinion, why the sites do not meet relevant planning policies, including the tests of effective housing land as stated in Planning Advice Note 2/2010 "Affordable Housing and Housing Land Audits". It is considered that consideration of these respective policies and tests provides a robust planning analysis of why housing is not appropriate at these two locations.

Policy Context

Scottish Planning Policy states that the planning system should allocate a generous amount of housing in each housing market area and maintain at least a 5 year supply (Paragraph 110). In order to do so, Scottish Borders Council should determine the "effectiveness" of housing land using tests from Planning Advice Note 2/210 (PAN) "Affordable Housing and Housing Land Audits" (Paragraph 55, PAN 2/2010). The PAN sets out criteria which respective sites should not conflict with. These tests require confirmation that the site should not create ownership conflicts, should be free from physical and infrastructure constraints, funding and marketing of the development should be agreed and it should be proven that housing is the sole preferred use of the land in planning terms.

Analysis of Policy

When comparing the characteristics of ACOLD011 and ACOLD014 against the PAN and key planning policies at this early stage, it is apparent that the sites do not meet all of the tests within the PAN or key policy criteria/content. This is due to the following limitations in relation to ownership, physical constraints, infrastructure and land use.

Ownership

We query whether it is feasible to create access to the site. All of the proposed access points involve land in different ownerships and the construction of roads to the sites. This process is expensive and legally complex; it must be questionable as to how access will be achieved?

We consider that there are more straightforward development options in Coldstream and Berwickshire that would not involve such complications, and that are therefore more straightforward to develop as a result.

We recognise that it has been noted that the extension off of the A6112 would intervene on the industrial site. Our opinion is that this route will result in problems in the long run, where road safety conflicts will arise between residents and the operations of the future industrial development. Again, our opinion is that there must be better development land options than the two sites which avoid such issues.

Physical

- Both sites are on land that slopes eastward, the topography will necessitate greater earthworks, which is, in turn, a more expensive undertaking than on land which is flat elsewhere in the settlement and/or Berwickshire.
- In terms of flooding, SEPA flood maps do not show that there is an immediate flood risk to the sites however there is risk of surface water impacts to the east of the site in particular. This will require to be investigated and may affect the amount of development land available. There are other sites in Coldstream and across Berwickshire where flood risk is not an issue at all.
- The land in question is prime quality agricultural land which is capable of producing a wide range of crops. In addition to damaging crop land, vegetation and natural habitat is also likely to be destroyed (for example at site boundaries). This is contrary to Policy ED10 "Protection of Prime Quality Agricultural Land and Carbon Rich Soils" within the Scottish Borders Local Development Plan. This policy states that *"development, except from renewable energy development, which results in loss of prime quality agricultural land will not be permitted unless the site is allocated, it meets an established need and no other site is available or the development is small scale and relates to a rural business."* In our opinion, there are alternative sites available in the Berwickshire area which are more suitable for housing and the good quality land in question should not be developed upon.
- The distance to the respective sites from the town centre and other essential amenities is 2km, in addition the sites are uphill, and these factors combine to show that the sites are

disconnected from the existing settlement. We are aware that the roads planning officer has proposed three access routes however we are uncertain that these roads have the capacity and suitability to support higher volumes of traffic, particularly any route through Hill View or Hatfield Loan. The likelihood of residents taking the car to the town centre would be high due to the long walking distance. Promoting a site which would increase the use of cars is contrary to the aims of the Policy PMD1 "Sustainability" within Scottish Borders LDP. Extensive car use is detrimental to air quality and may bring adverse health impacts to the area. There are better development site options in Coldstream that are within walking distance of the town centre and other key amenities, such as medical facilities. We consider that housing land closer to amenities in other settlements in Berwickshire is also better in line with respective planning policies than locating development in these locations.

- The disconnection of the sites from the town centre is also against Policy PMD2 "Place Making and Design, Quality Standards" and the main issue "Supporting our Town Centres". The Scottish Borders Placemaking Supplementary Guidance states that "*it is important that new sites relate and form an integral component of the local area, socially and physically.*" We think this is a critical point in relation to ACOLD011 and ACOLD014, Scottish Borders Council appear not to have given due weight to placemaking considerations when allocating/proposing these respective sites. It is also the case that by allocating remote housing allocations, car use will be encouraged which will then bring adverse impacts on the town centre due to parking issues and adverse amenity from congestion/air quality. We cannot see how development of these sites meets the placemaking considerations within the existing Local Development Plan and associated Supplementary Guidance:
 - development at these locations will not have a positive sense of place in relation to the existing settlement at Coldstream, instead it will sit divorced from the settlement poorly related to the existing built character and beyond a mature planting belt;
 - development will not be compatible with the surrounding land uses, the amenity of residents will be dominated by traffic and noise associated with the farm and the industrial estate. Housing development will be an "island". This can be contrasted with sites closer to the settlement centre or in other settlements, with no neighbouring land use conflicts (please see the detailed section on "*Land Use-conflict with farming operations*");
 - delivery of housing in this location will necessitate the creation of artificial boundaries. Is it not preferable to locate development elsewhere, using existing mature planting as a backdrop?;
 - it is unclear how creation of path/cycle linkages will be provided. This is a key issue, the Main Issues Report details that the population in the Borders is ageing, including a 31% increase in the number of people aged 75 and older (p9). However, these housing sites are located far removed from the town centre and key medical facilities. Why not allocate housing sites where walking is a realistic possibility? Whether this be elsewhere in Coldstream or elsewhere in Berwickshire? We would suggest that this issue also affects prospective residents with mobility issues. The allocated and proposed housing developments in question bring the risk of increasing social isolation, as opposed to bolstering Coldstream and its key facilities/services;
 - our opinion is that there are alternative housing sites possible in Coldstream and elsewhere in the Borders, where meaningful connections to existing open spaces

and path linkages are realistic. Development at ACOLD11 and ACOLD014 will be challenged to realistically connect to such links; and

- the development of an access road through the planted boundary is contrary to Policy EP3 “*Local Biodiversity*” within the Scottish Borders Local Development Plan which states that local biodiversity should be safeguarded and enhanced.

Infrastructure

In terms of infrastructure which exists on the site, the need for diversion of a water main requires to be investigated. Our understanding is that this is a major requirement and could affect the viability of the sites as development options, particularly in a challenging housing market. Again, there are likely to be development options elsewhere, that do not require such major, costly infrastructure works.

As the site is greenfield there is no other infrastructure existing, and the development of housing would therefore require all infrastructure to be provided to support housing. Again, we would question whether the sites can be considered effective if long sections of roads, sewage and water pipes, and major earthworks etc. are required? It appears more logical to allocate sites that are easier to develop, easier in Coldstream or elsewhere in Berwickshire. Currently, our opinion is that the respective development sites do not meet this critical criteria in determining “effective” housing sites.

Funding and Marketing

Given the evident challenges of delivering housing at ACOLD011 and ACOLD014 we consider it questionable as to how the sites will be sold to a housing developer. Coldstream has a challenging housing market and it seems illogical to allocate difficult to market housing sites when there are more marketable sites elsewhere in Coldstream and Berwickshire.

Is it realistic to expect a housing developer to purchase a site which is located between an operational farm and an industrial estate, then have to consider how to build multiple access routes (which require further land outwith the allocation), divert a water main, undertake considerable earthworks, assess flood risk, consider noise and air quality, and consider lengthy infrastructure connections, whilst operating in a marginal housing market area?

We consider it more sensible to allocate easier housing sites in other areas of Coldstream and/or Berwickshire. Such sites should avoid such major constraints, therefore ensuring that they are as effective as possible and in line with SPP requirements.

Land Use- Conflict with farming operations

The development of ACOLD011 and ACOLD014 would severely affect farming operations at Coldstream Mains Farm.

The farm is the base a very large agricultural operation. The site has 8000 tonnes of grain storage and 4500 tonnes of potato cold storage. To manage this operation requires:

- **440 heavy goods movements per year** to export from the site
- to bring material into the site requires **1230 tractor and trailer movements per year.**
- Additionally there are all the normal supply deliveries associated with a busy farm business and movements of Plant & Machinery at the site.
- At harvest time there is **24/7 operation of plant & grain drying equipment (remainder of the Year 5am – 10pm operations)**

Our strong opinion is that the above vehicular movements, site operations, noise and odours mean that deliverability of housing at the respective sites is seriously in question. In particular there is clearly road safety and health and safety issues due to:

- prospective residents gaining access when not permitted;
- mixing with delivery traffic/site operations;
- being subject to noise; and
- being subject to odour/air quality issues.

Farming operations and industrial use do not complement housing allocations sensitively and conflicts will arise. Our opinion is therefore that there are better housing options in Coldstream and elsewhere in Berwickshire that avoid the above issues.

Conclusions

To summarise, we are confident that this letter has made a strong, robust case that ACOLD011 and ACOLD014 do not meet the tests of “effectiveness” displayed within PAN 2/2010 and, as a result, are not in line with the requirements of Scottish Planning Policy.

In addition, the sites are contrary to key Scottish Borders Local Development Plan policies including, Sustainability (PMD1), Placemaking (PMD2), Biodiversity (EP3) and Prime Quality Land (ED10).

We are aware that Scottish Borders Council has put forward recommendations to ensure delivery of landscape mitigation and enhancement of the development sites. However we think that development would result in a large isolated housing development in very close proximity to an industrial site and major agricultural operation. Our opinion is that these sites represent a poor choice when there are other better sites elsewhere in Coldstream and Berwickshire.

Yours faithfully

