

**From:** [REDACTED]

**Sent:** 30 January 2019 16:30

**To:** [REDACTED] >

**Cc:** [REDACTED]

[REDACTED] >

**Subject:** Main Issues Report

## **Main issues Report January 2019**

We have appointed Alistair Smith of AMS Associates Ltd. to promote a site for development on our land in Ednam.

Details of the proposal are contained in the submission dated January 2019 from AMS Associates and we write in support of this submission as follows.

Following a review of the MIR we write to support the inclusion of AEDNA011 as an option for housing in the Scottish Borders Local Development Plan 2 Main Issues Report (MIR).

The area detailed in the MIR shows good connection in terms of placemaking between Ednam and existing housing at Cliftonhill and the site is well located to provide a successful and sustainable area of growth for Ednam. The predicted 31% rise in the population over 75 will bring a requirement and demand for houses that are suitable for this age group. They will need to be sustainable and efficient in terms of energy and space and be in communities that have access to the services and activities required to keep the population fit and active. Ednam is such a village. To ensure that there is a good mix of demographics there will be a need for housing that is suitable for starter homes, family homes and general market homes.

Having farmed on the edge of the village for more than 35 years it is important to us to ensure that the village develops in a manner that will sustain and strengthen the community for the future.

There have been two new houses recently built at Cliftonhill [REDACTED]  
[REDACTED] we have also expressions of interest from other young families wishing to live in the village which proves the need for and desirability of new housing in Ednam.

This being the case the scheme that [REDACTED] will provide a range of affordable housing, starter homes as well as mixed market houses. To complement this, [REDACTED] to make land available for organic allotments and an organic orchard. This we feel will help encourage sustainable living and re-establish a link between village living and local food production.

Ednam has an active Church congregation, together with the village hall being home to various groups and classes comprising all ages and activities.

There is capacity for more pupils in the primary school and nursery, and the site is next to the bus stop with a regular bus service connecting the village to the town of Kelso and beyond.

A modest increase in the population of the village that would be brought about by this development is important to revitalise and sustain the village bringing families back to Ednam to ensure that the services we have are maintained and enhanced by increasing demand.

Although the effect of Brexit is still unknown, I fear that rural areas may be badly affected and it is encouraging that the Council is looking at ways to mitigate negative outcomes that would create further depopulation of The Borders.

Encouraging development in smaller villages and settlements is a way that would help to provide homes for younger people and an aging but active older generation.

By prioritising smaller sites local builders would benefit rather than the national house builders that are required for large housing sites in the larger towns.

We hope that you will appreciate the originality of this proposal that aims to provide a range of housing and facilities in a sustainable community that will be easily integrated into a traditional Borders village.

On receipt of this submission please do not hesitate to contact us if you require any further information.

Yours sincerely,

██████████  
██████████

***Cliftonhill***

***By Kelso***

***Scottish Borders Council – Call for Sites  
(Pro Forma)***

***Representation Design Statement Submission***

***for***

***Residential Development Site***

***at***

***Cliftonhill  
Ednam***

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## General Introduction

AMS Associates Limited has been appointed by the [REDACTED] to review the opportunities of developing the land within their ownership all as shown on Figure 1 and the aerial photograph Figure 5.

We write to support the inclusion of AEDNA011 as an option for housing in the Main Issues Report.

The area shown in the MIR shows good connection in terms of placemaking between Ednam and existing housing at Cliftonhill and the site is well located to provide a successful and sustainable area of growth for Ednam.

Cliftonhill comprises an agricultural farm, the house and outbuildings located to the east of the settlement of Ednam in Roxburghshire. [REDACTED] with a variety of land uses taking place.

[REDACTED]

This site with its general location is fully detailed in the following chapters where the issues of planning policy, site layout and environmental issues are addressed.

## Farm Details and Business

[REDACTED]

guests. Using figures from Visit Scotland it is estimated that these visitors will bring over £250,000 benefit to the local economy. (*VisitScotland Tourism in Southern Scotland 2011*) The farm hosts a walk along the banks of the Eden and a range of wildlife and bird life for visitors to enjoy. Guests also have the use of the tennis court at Cliftonhill and can arrange to have coaching.

The farm built three new self-catering holiday lodges last year, the project started in April 2018 and was completed by September 2018, the use of modern sustainable building materials and methods made this possible and these lodges are proving very popular with visitors and there have already been repeat bookings.

The cottages all have wood burners for heating with wood harvested from the farm woods. In addition, the cottages and farmhouse are heated by a biomass district heating system and the farm also has potential for other renewable energy projects with wind, solar and micro hydro-power all being investigated. In addition, a view is being taken to introduce rain harvesting where this can be operated.

## **Cliftonhill**

### **History**

The area of land of interest comprises the south west corner of an agricultural field rising to a level of 70 metres A.O.D. from 40 metres A.O.D. The field is bounded by the group of houses forming Cliftonhill Cottages to the east which includes two new properties recently consented and other agricultural land to the north and south east. The location of the site is shown edged red on plan no. Figure 1 which is the same area as shown on the Local Plan Amendment 2008.

The consent obtained for the 2 properties stated above have been built and [REDACTED]

At this point we would make reference to the Reporter's conclusions from the Finalised Local Plan – January 2007 which forms Appendix A of this report.

It is understood that the planning consent reference 04/02341/FUL for a number of units at Ednam West Mains Farm, Ednam has now lapsed with the commencement conditions to this consent having not been discharged and development has not commenced on site. This being the case planning permission expired on 10<sup>th</sup> of September 2013. The current Local Plan profile for Ednam identifies this area for future development although it is very close to the areas that may flood as shown on the most recent Indicative Flood Map produced by SEPA.



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## Details of the Proposal

### The Site

As noted above, the site comprises the south-west corner of an agricultural field that adjoins the village of Ednam to the east (see Figure 2). The site lies within the 30mph limit for the village and would form a neatly contained, and modest, expansion of the settlement to the east. It is proposed that planting be introduced along the line of an existing gas main which would form a new, defensible eastern boundary to the village (and the site) which would prevent any sense of coalescence with the various properties around Cliftonhill which lie further to the east.

### Development

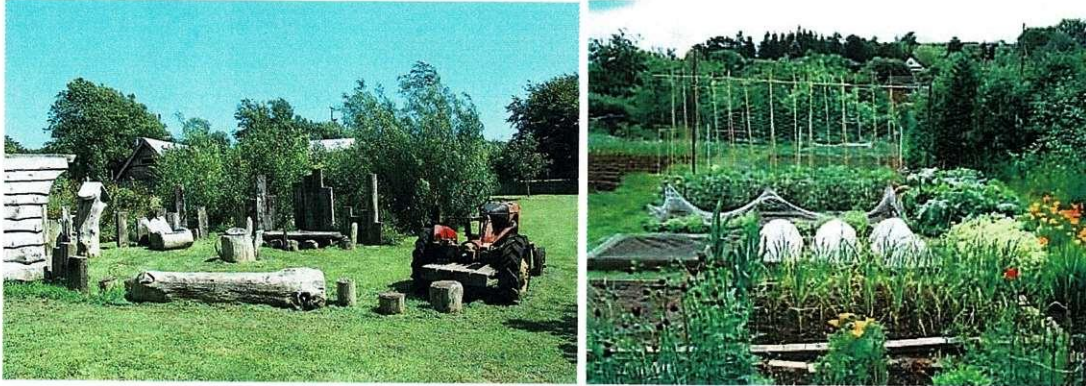
It is proposed that the development land would comprise part of the village of Ednam, being within the 30-mph limit.

At present the settlement of Cliftonhill comprises 15 properties made up of cottages, houses and 2 individual large detached properties constructed in recent times situated to the east known as 'The Seasons' and 'Hillend' and the 2 proposed properties to the west of the cottages consented following a Local Review and now under construction.

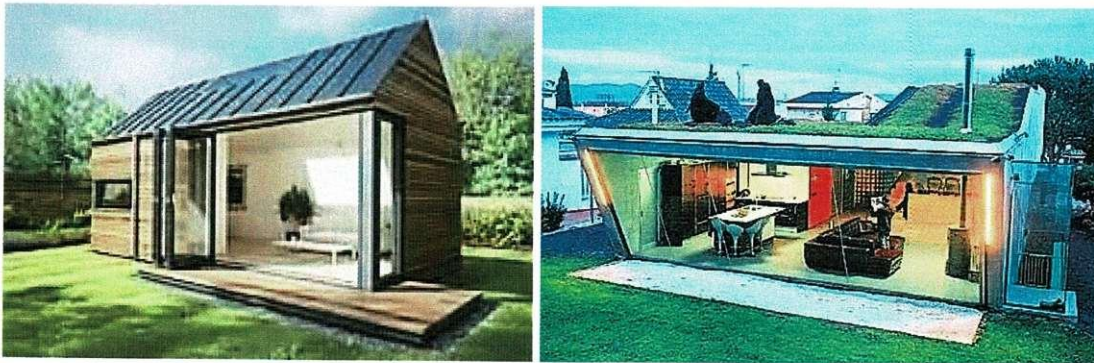
Given the location of the site on the western fringe of an organic farm, and taking into account the bespoke range of dwelling types in rural Roxburghshire, it is proposed that the site comprise an equally bespoke and different mix of housing to reflect its location and heritage. It is proposed that part of the site be dedicated to eco self-build plots (see Plate 2 below) which will be serviced in the same manner as the rest of the development but will offer a bespoke type of house building opportunity in the area. Having taken into consideration the Scottish Government Response to the Recommendations of the Commission on Housing & Wellbeing, the remainder of the site would comprise a more traditional mix of private sector, affordable and social housing. It is considered that the site is capable of delivering 15 to 20 properties which, in time, will provide a balanced development on the eastern side to Ednam which could not be extended further east due to service constraints. An example of a provisional layout for the site is shown on Figure 3 to illustrate how the site could be developed going forward.

A key part of this proposal is the opportunity to deliver associated facilities which complement the bespoke range of housing proposed and would be of benefit to the existing village, including an organic orchard, organic allotments, wooden play area/open space (see Plate 1 below) and small paddocks. Two footpath links with the rest of the village to the west are shown on Figure 3 to ensure that the site integrates and becomes a valuable part of the existing village. The detail of these areas, how they would operate, ownership, maintenance etc. would be included in a detailed design which would accompany a planning application should the site be allocated.

**Plate 1: Example of traditional play area/open space and organic allotments linked to the heritage of the land at Cliftonhill**



**Plate 2: Example of eco self-build opportunity**



**Access**

The access to the proposed development land would be from the existing field access as shown on plan Figure 3 being accessed from the unclassified road that connects with the B6461 in turn to the A698. The proposed access would be to local authority standards.

The access proposed would service all of the proposed properties entailing only one entry onto the public road, a common practice here in the Borders.

**Sustainable Transport**

The village of Ednam is served by public transport connecting the main centres in this part of the Scottish Borders.



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## **Drainage and Services**

All surface drainage and foul drainage would be directed to the existing drainage system servicing Ednam. If necessary, an alternate system would be constructed or a contribution provided to the existing system for necessary upgrading works.

The site also has the provision of gas and electricity supply adjacent.

## **Education Provision**

Ednam has a primary school which has attached a sought-after nursery. The school has a listed capacity of 100 pupils and has a projected role of 47 in 2016/17 falling to 41 in 2019/20. In 2014 there were 21 pupils attending from within the catchment area and 22 attending from without the catchment area following placement requests. The school is listed as in satisfactory condition with the nursery listed as being in good condition. (*SBC School Estate Review March 2016*)

Provision of affordable and starter homes will help to bring families back to the village and boost the school role.

## **Site Area**

The land take would comprise that area edged in red on the Development Plan figure 3 which would allow for access, parking, landscaping and gardens together with landscaped area. The plot area totals 1 hectare which equates to <1.0 % of the total farm ground area.

## **Site Construction**

The proposed residential properties within the development site would be of a high standard in keeping with similar properties in the area and built to provide sustainable housing.

## **Fencing**

The boundary of the development site would be fenced and soft landscaped.

## **Landscaping**

All works carried out would be designed to relate to the countryside and the gardens which presently exist in the area.

## **Constraints**

There are no known constraints on the site such as environmental contamination and flood risk.

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## Benefits

The design proposal presented has built in the benefits of allotments, orchard, play area, footpath links etc. and with increasing the number of residents increasing the development would make positive financial contributions towards education and help sustain local transport services.

## Timescale

The commencement of the development would be dependent on being included in the new Local Plan following which the granting of planning permission, detailed planning matters and receipt of building warrants would be required to allow works to progress. Subject to the foregoing, this site is in single ownership and is capable of delivery within the coming Plan period (up to 2021).

The sale and development of two recently consented house plots at Cliftonhill shows the demand for housing in the village and [REDACTED]

## General Conclusions

*'Contained within the Edinburgh & South East Scotland Strategic Development Plan (SES Plan June 2013) Geddes Consulting has stated that there will be a major shortage of suitable housing here in the Borders in future years.*

The project as promoted would be designed to a high standard with an emphasis on a bespoke mix of sustainable housing which would be committed to conserving the natural resources. Affordable housing and starter homes would help revitalise the village by bringing families back to Ednam thereby increasing the school role and providing a demand for local services. The proposal would also provide a valuable range of associated facilities that would enhance the existing village as a place to live and visit.

It is noted that planning consent previously granted for housing in the village of Ednam will not now take place as the permission has expired; this indicates a shortfall in the local area. In this regard, it is noted from previous Local Plan Reporter's findings (see Planning History Section above) that the site being proposed has merit in planning terms for inclusion as a sympathetic expansion of the village to the east. This coupled with the bespoke range of housing proposed within the site; the innovative range of complementing facilities; the lack of environmental constraints to development; adequate access from the existing road network; good public transport links; and that the site is in single ownership and capable of delivery within the coming plan period, are all strong considerations which weight in the favour of this site being allocated for future development.

Finally, a recent survey shows that within the Borders the projected high growth of the area, namely jobs growth was less than 6.5%, the third lowest area in the UK, provision of suitable housing in a convenient sought-after area will assist in addressing this issue.

## **Plans**



**Location Plan – Figure 1**

**Land Interest Plan – Figure 2**

**Design Boundary Plan – Fig. 3**

**Local Development Plan (adopted) 2016 – Fig. 4**



**Land Development Map – Fig. 5**

## **Photographs**



**View – Duns Road towards Ednam (Site on Left)**



**View – Ednam with Site to the Left**





**View – Towards Ednam on the Duns Road**



**View – West towards Ednam from Cliftonhill Cottages**



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**Appendix A – Reporter’s Findings of Localised Local Plan May 1994**

2.38 I recommend that a modest allocation of land for housing should be made on the north side of the road to Cliftonhill served by an access from that road. The land is known to be available for development if so required to meet a range of housing needs. As far as possible the land should be defined close to the south west corner of the field close to the existing village edge. In defining the allocation of land consideration should be given in particular to the location of the access; the future direction of growth of the village and the extent of the need for housing in the plan period. Proposals for planting should be planned for screening and enhancement of the new housing areas on the east side of the village.

**Appendix B – Reporter’s Findings of Finalised Local Plan – January 2007**

<b>Subject:</b>	<b>Ednam Profile site RE1B &amp; Omission RE2, Ednam</b>
<b>Objectors:</b>	<b>[REDACTED]</b> <b>Ednamhill Ltd (3217/1/1 &amp; 2 &amp; 3)</b> <b>Per [REDACTED]</b>
<b>SBC:</b>	<b>MW, AS &amp; RE</b>
<b>Procedure:</b>	<b>Hearing (16 November 2006 pm)</b>

### **Brief summary of objections**

The objector supports inclusion of a new site, RE2, for housing allocation, either in addition to or in place of the 1.3ha allocation RE1B shown for Ednam in the finalised local plan, and a corresponding extension of the development boundary for the settlement to encompass RE2 at the eastern side of the village. If, for whatever reason, it could not be formally allocated at this time it is contended that the RE2 site should be protected by being designated in the finalised plan as the preferred area for future expansion of the village.

### **Background**

The finalised local plan includes one allocated site for Ednam, RE1B, at the western edge of the village. The objection lodged envisages a mixed development, including one third affordable housing, on site RE2 and expresses a preference for this to be considered as an additional allocation to RE1B. If, for whatever reason, this was not acceptable then the proposal is for RE2 to be a replacement for the allocated site.

### **Main grounds for the objection**

The main points put forward in support of the objection are:

- Despite clear evidence, from the Ednam, Stichill and Berrymoss Housing Needs Survey, of local demand for 18 affordable units, the finalised local plan does nothing to support the provision of low-cost or affordable housing units
- In particular, there is concern that the only allocated site RE1B, for just 6 dwellings (amounting to over 0.5 acres per plot), is inappropriate as it does not address the local community needs of Ednam. It is argued, therefore, that the Council's allocation is inconsistent with Policy H1 of the finalised local plan



- Accordingly, it is contended that another allocation should be made (RE2), preferably in addition to RE1B. The RE2 site was allocated in a previous local plan for 30 units and has a complex history including 2 refusals of planning permission. It would provide a mixed residential development, including one third (around 10) affordable housing units and this would be in accord with Policy H1, as well as SPP3 and PAN74
- It is argued that the site would have been developed before now if it had not been for unfortunate timing of infrastructure improvements and local plan reviews
- In the context of the hilly nature of this village and the surrounding area, it is contended that the proposed development on the objection site would be compatible and no more visually intrusive than the allocated site RE1B which itself has no defensible boundary to the west.

#### **Council's response to the objections:**

The main points put forward by the Council in response to the objections are:

- There is currently sufficient land allocated for development in the HMA as a whole within the finalised local plan to meet, and indeed exceed, the structure plan housing land requirement for North Roxburgh HMA set out in Policy H1 of the Structure Plan, which specifies no shortfall in this HMA
- In this context, it is argued that the 475 housing units brought forward in North Roxburgh as land allocations in the finalised local plan is more than is required across the HMA and provides sufficient flexibility and choice of locations for development within the HMA
- The second structure plan test or requirement is to demonstrate a 5 year housing land supply when the local plan is adopted. The draft Housing Land Audit 2006 shows an effective supply of 1011 housing units in North Roxburgh HMA which far exceeds the projected requirement for 246 units over the next 5 years in the HMA as a whole, taking account of recent completion rates in North Roxburgh (379 units in the last 5 years)
- Accordingly, from a strategic viewpoint the Council argues that there is no need for additional allocations in Ednam to meet structure plan requirements. Nevertheless SBC recognises, subject to the necessary service infrastructure being available, there is an obligation to make settlements of this dispersed area viable by ensuring there is an adequate supply of housing to meet local needs, whilst safeguarding the environment of the area
- The Council states that any new housing developments in North Roxburgh HMA are currently required to provide 15% as affordable units, in accordance with the Council's Supplementary Planning Guidance on Affordable Housing, but this is under review (through a Housing Needs Assessment) and may be raised in future. For smaller sites the requirement is often met through a financial contribution towards affordable housing provision elsewhere, such as nearby in Hawick, rather than actual plots within an allocated site being set aside for affordable housing development in individual villages
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- In terms of service infrastructure, Ednam has a Post Office and a Primary School with a current roll of 72% which is declining, whilst at the secondary level Kelso High School is

operating at 81% capacity. There is adequate water supply and the local Waste Water Treatment Works has capacity for an additional 200 units. In summary there are no service constraints affecting future development of Ednam

- The Council considers that the scale of development envisaged on site RE1B would be compatible with the existing built environment of Ednam - having undertaken an analysis of the potential landscape impact as part of the site selection process
- Whilst acknowledging that the objectors' preferred site RE2 was the subject of a draft allocation in the 1992 Consultative Draft local plan, the Council notes that it was not formally allocated in the adopted local plan of 1995
- Whilst it is capable of being accessed satisfactorily, the objection site raises some concerns, firstly regarding its visibility - and therefore regarding the likely visual impact of any housing development there. There are also some very localised flood risk issues. Furthermore, the Council points out that the objection site has no defensible eastern boundary. Based on all of these considerations, allocation of this site is now regarded as neither desirable nor necessary.

## Conclusions

I note that the objector has not sought to challenge the strategic assessment made by the Council which concludes that, in overall terms, the housing allocations made within North Roxburgh HMA, as detailed in the finalised local plan:

- meet or exceed the structure plan housing land requirements for the HMA in terms of projected need and shortfall;
- are well in excess of the other structure plan requirement to provide at minimum a five year housing land supply at the point of adoption of the local plan and throughout the plan period, based on the effective supply (estimated in the draft 2006 Housing Land Audit) and projected requirements, taking account of recent housing completion rates in the HMA.

Based on the available evidence, I am satisfied that the Council has met these requirements for the HMA as a whole. I note that the objector does not seek to take issue with the existing allocation RE1B, apart from pointing out that the proposed development of the allocated 1.3ha site is expected to produce only 6 mainstream, very low density housing units; offers no affordable housing 'on the ground' in Ednam; and has no defensible western boundary. These particular arguments have not been challenged by the Council. I note that the first preference of the objector is for the objection site RE2 to be considered as an additional allocation. I am persuaded by the Council's arguments that, based on the structure plan requirements including the need to demonstrate a five year housing land supply, there is no justification for an additional allocation of around 30 units at Ednam on the objection site RE2, or indeed elsewhere in the village. I am also in agreement with the Council that the availability of access and capacity in the local service infrastructure together with the offer by the objectors to provide one-third affordable houses - perhaps 10 out of 30 units of a mixed development on site RE2 - are not sufficient reasons to justify an allocation of the objection site either in addition to or in place of the allocated site RE1B. Whilst sharing the concern of the Council regarding the lack of a defensible boundary of site RE2 at its eastern edge, I note that the allocated site has a similar problem on its western edge where there are no natural or other recognisable boundary features.

I now turn to consider environmental and related matters affecting the scope for additional development in and around Ednam. I am not persuaded by the Council's arguments that the objection site is visually intrusive or prominent, noting that it is situated in a fold in the undulating hills that make up much of Ednam and the reference to the possibility of very localised flood risks has not been substantiated by the Council. I am persuaded, instead, by the arguments put forward on behalf of the objectors that RE2, being a centrally located site within the village, could provide a beneficial housing site, and an opportunity to provide affordable housing locally to meet identified needs for such housing, which the Council concedes are not being addressed by the allocated site RE1B in the village - as a financial contribution to affordable housing provision elsewhere is the likely outcome in that case. I note that the site RE2 was previously considered



suitable by the Council for allocation for housing, albeit some years ago, Draft local plan.

Based on all of the above considerations, together with the shortage of a in my view there is not sufficient justification for allocating the objection sit to or in place of the allocated site RE1B, I conclude that there is a case side of Ednam, which includes RE2, for longer term expansion beyond note that there is no area of Ednam identified for longer term expansion c indicative designations have been made for many other settlements of No ones of comparable or lesser size. I note that Ednam has an existing P school with a reasonably strong but declining school roll so the aim of s such village services and facilities in this village should be an on-going Accordingly, I conclude that there is justification for amending the wordir of the finalised plan under the heading of Areas for Longer Term Ex (incorporating text equivalent to that shown in the corresponding sec detailed in my recommendations below.

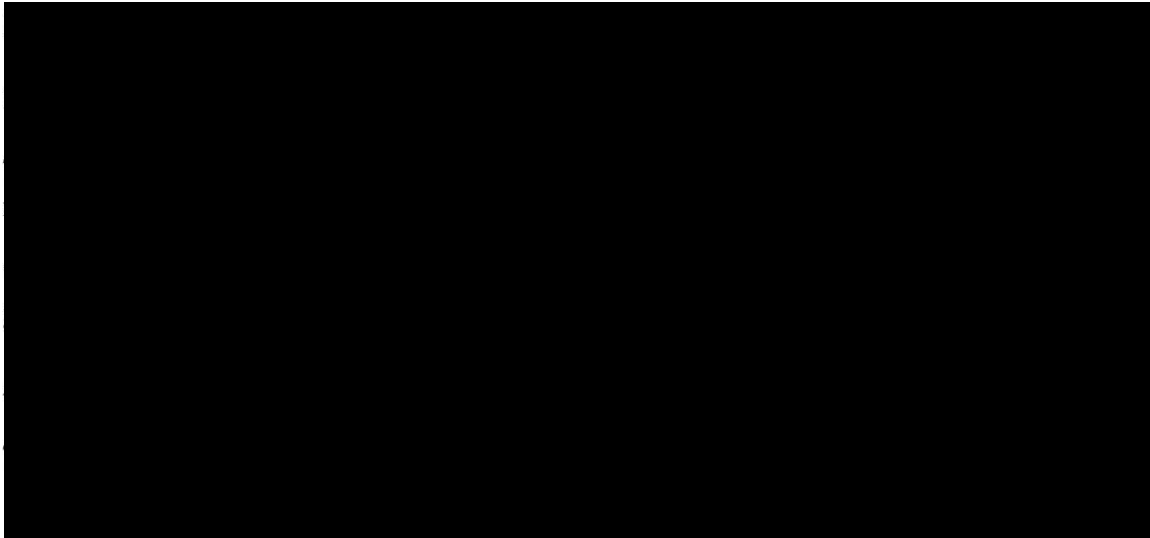
### **Recommendations**

No change to the existing allocation for Ednam in the local plan, but wording of the Ednam settlement statement, under the heading *Areas for and Protection*, in the terms outlined below.

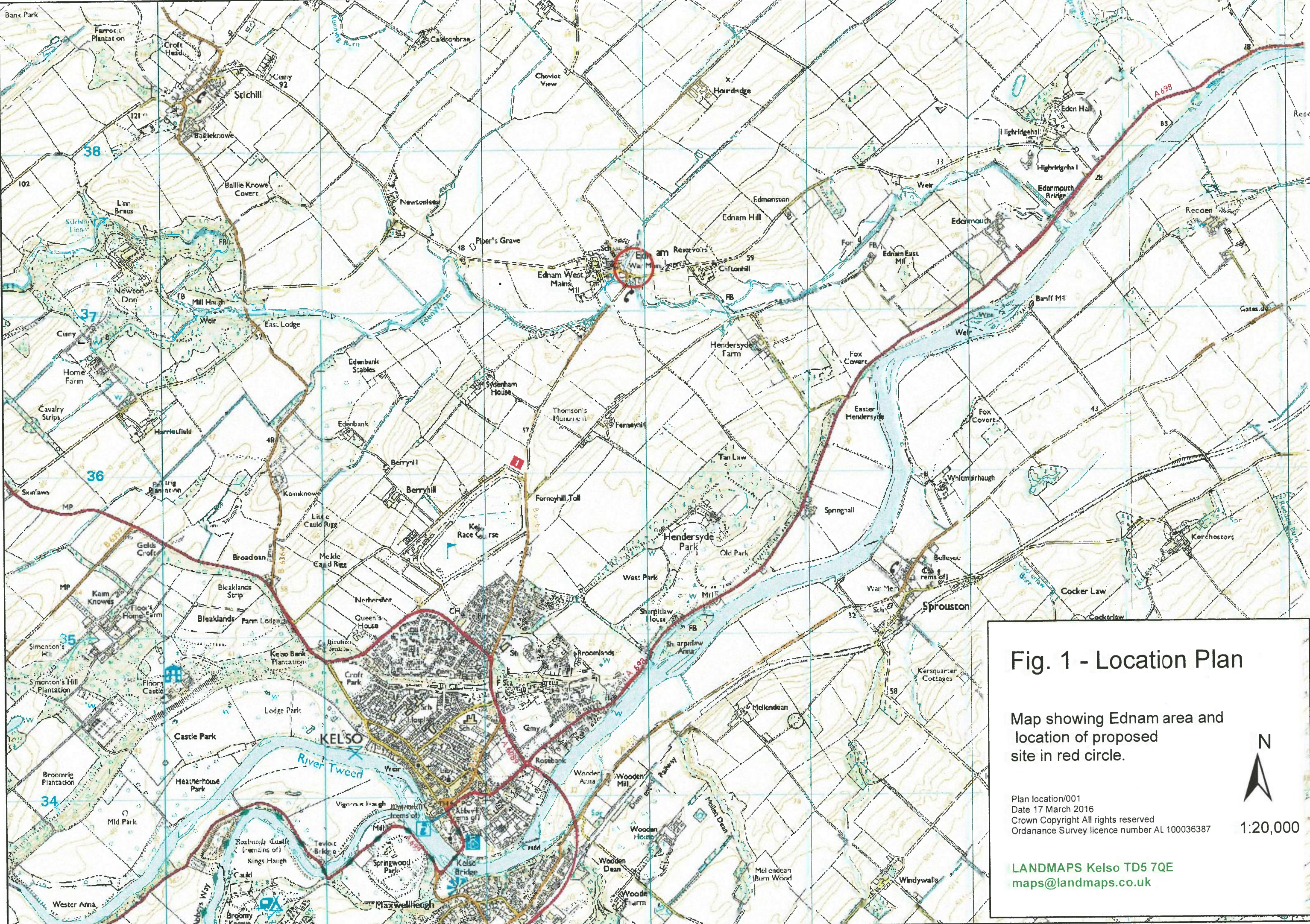
*"Once the allocated site is fully developed the preferred area for future period of this Local Plan (2011), if required, will be to the east side of t structure plan requirement to allocate any further land in the village at the*

*The area suggested for future growth is indicative only and will r assessment during the next Local Plan Review."*

**Appendix C – Farm Diversification**







**Fig. 1 - Location Plan**

Map showing Ednam area and location of proposed site in red circle.



Plan location/001  
 Date 17 March 2016  
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1:20,000

LANDMAPS Kelso TD5 7QE  
[maps@landmaps.co.uk](mailto:maps@landmaps.co.uk)





## Fig 2 - Land Interest Plan

Map showing area of proposed development.

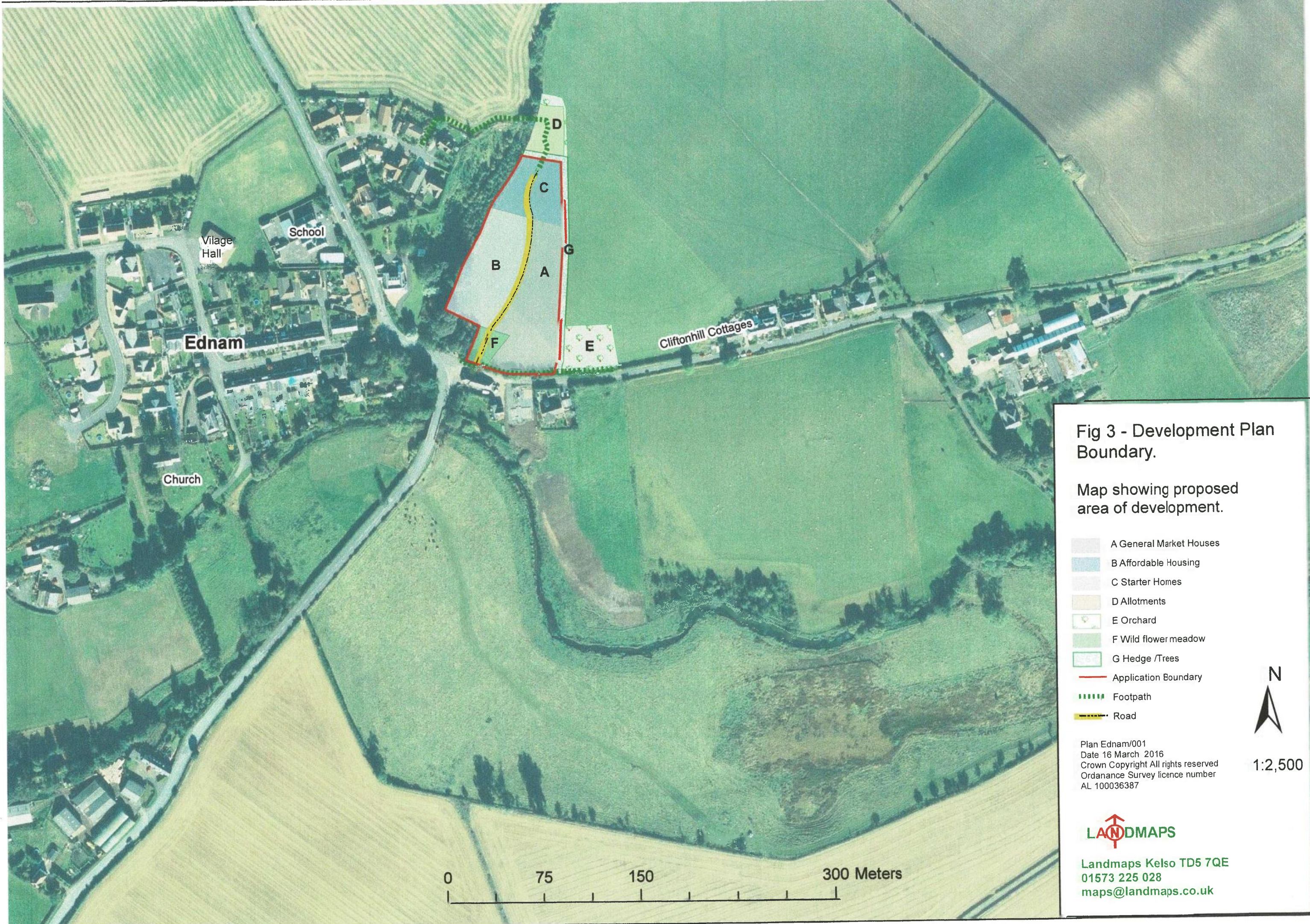
— Application Boundary



Kelso TD5 7QE  
01573 225028  
maps@landmaps.co.uk  
www.landmaps.co.uk

Plan ACS/LP/006  
Date 23 March 2017  
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**Fig 3 - Development Plan Boundary.**

Map showing proposed area of development.

- A General Market Houses
- B Affordable Housing
- C Starter Homes
- D Allotments
- E Orchard
- F Wild flower meadow
- G Hedge /Trees
- Application Boundary
- Footpath
- Road

Plan Ednam/001  
Date 16 March 2016  
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1:2,500

0 75 150 300 Meters

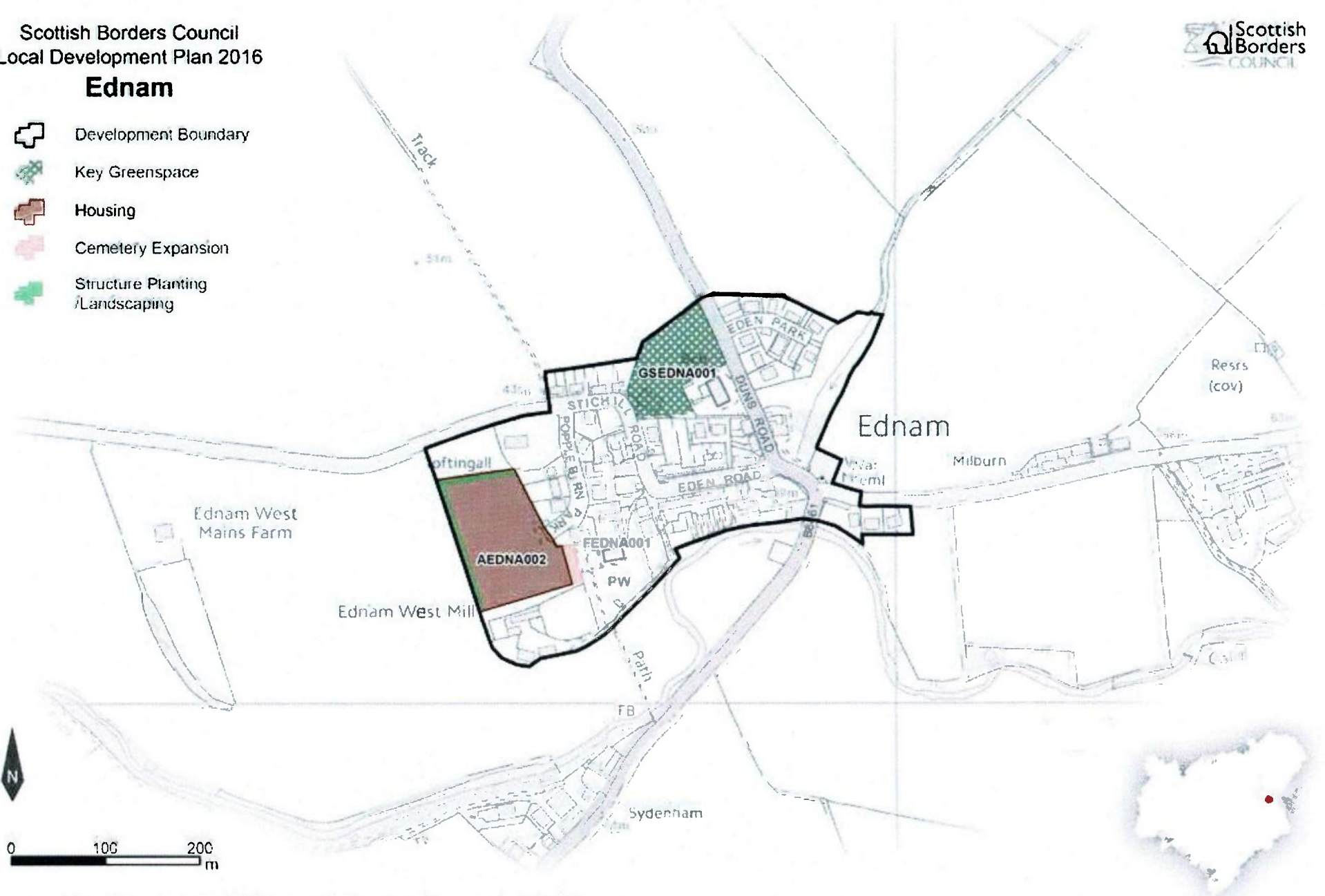


Landmaps Kelso TD5 7QE  
01573 225 028  
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**Ednam**

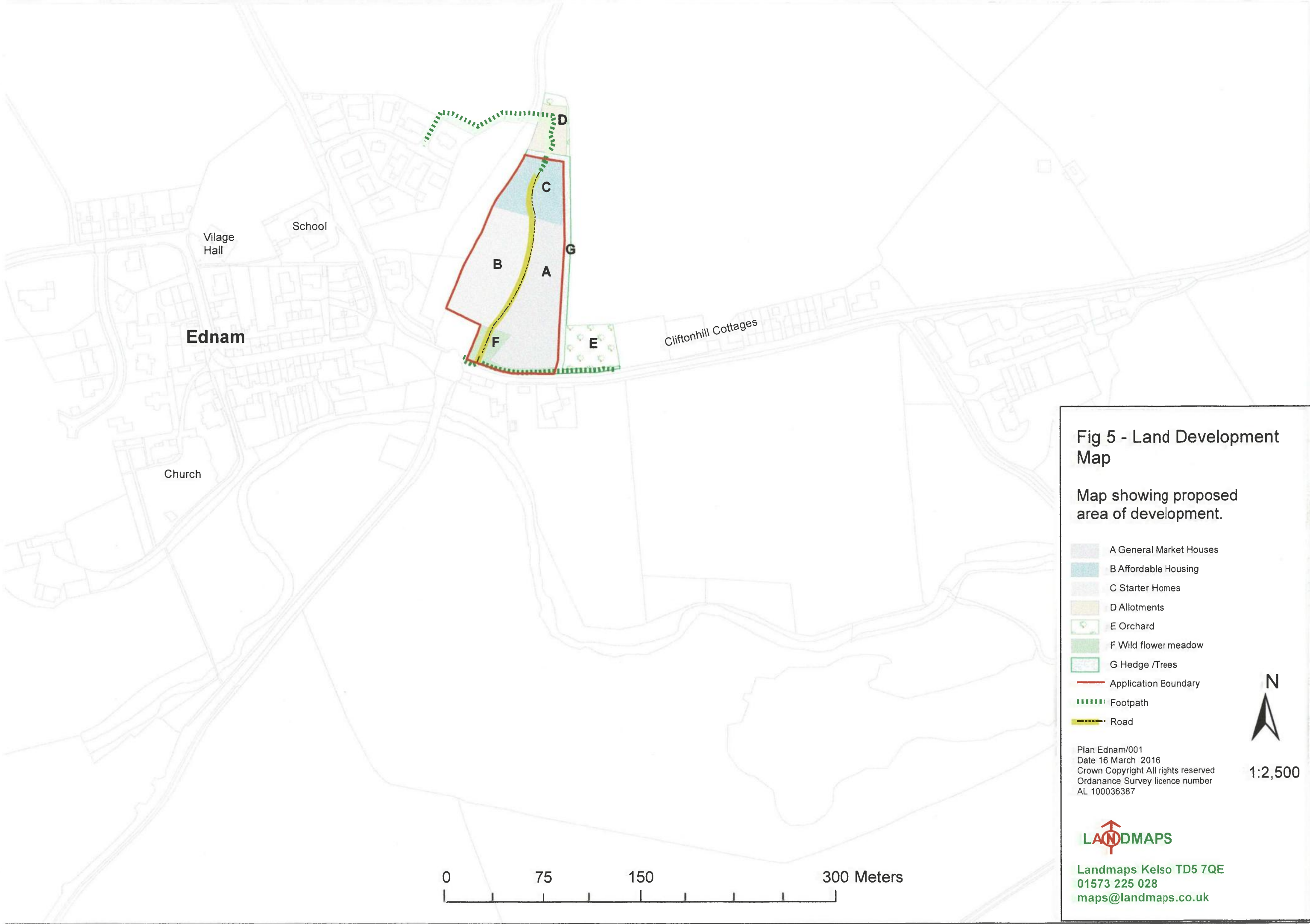
- Development Boundary
- Key Greenspace
- Housing
- Cemetery Expansion
- Structure Planting / Landscaping



LOCAL DEVELOPMENT PLAN | SCOTTISH BORDERS COUNCIL | 293

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Fig. 4



**Fig 5 - Land Development Map**

Map showing proposed area of development.

- A General Market Houses
- B Affordable Housing
- C Starter Homes
- D Allotments
- E Orchard
- F Wild flower meadow
- G Hedge /Trees
- Application Boundary
- Footpath
- Road

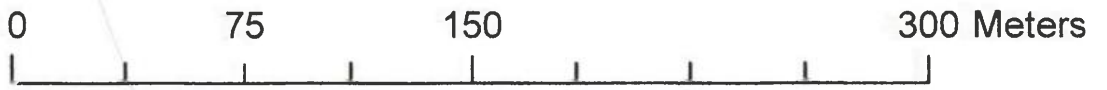


1:2,500

Plan Ednam/001  
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**Landmaps Kelso TD5 7QE**  
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[maps@landmaps.co.uk](mailto:maps@landmaps.co.uk)





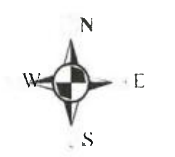


# Cliftonhill Farm

Map showing the extents of Cliftonhill Farm.  
Farm area shown outlined in red.

Fig. 6

Plan number  
Scale 1:7000@ A3  
Date 25 March 2010  
Survey datum WGS 84  
Survey by ACS  
Coordinates at centre  
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number AL 100036387



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