

Local Development Plans Team
Scottish Borders Council
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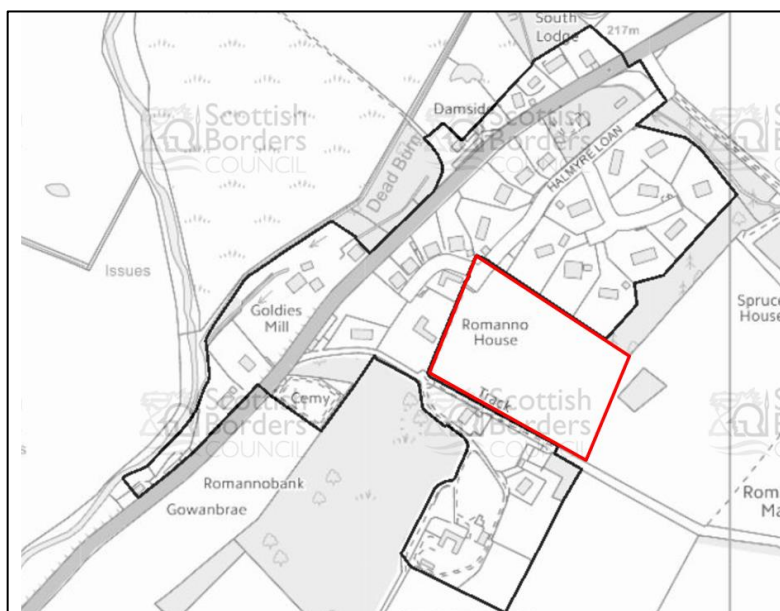
LAND TO EAST OF ROMANNO HOUSE, ROMANNO BRIDGE, WEST LINTON REPRESENTATION TO LOCAL DEVELOPMENT PLAN 2 MAIN ISSUES REPORT

Dear Sir/Madam,

This representation is submitted on behalf of our Client [REDACTED], of [REDACTED]
[REDACTED]

[REDACTED] The site lies immediately adjacent to existing development at Romanno Bridge which is accessed off Halmyre Loan. Romanno Bridge is an identified settlement within the Northern Housing Market Area and the land was presented during the 'Call for Sites' for the Housing Supplementary Guidance (SG) with an indicative capacity for 11 units. The submission which follows below addresses whether our Client agrees with the 'preferred' and 'alternative' options for additional housing sites within the MIR (Question 7 in the MIR). Our Client wishes to submit an objection to the non-inclusion of the site as a 'preferred option' for housing development with an indicative capacity of 11 units for the reasons outlined in this submission.

Fig 1: Location of the site in relation to Romanno Bridge.



The Site Assessment which was carried out for this site following the Housing SG 'Call for Sites' raised a number of material and positive points which remain of relevance, including those noted below.

- There are no significant biodiversity issues.
- There are no archaeological constraints.
- It is acknowledged that the eastern-most part of the site begins to rise and that SNH commented that the existing woodland strip should be extended, with development kept back from the higher ground. Our Client is in agreement with this approach.
- There would be no material impact upon the Cross Borders Drove Road which runs along the western and southern boundaries of the site.
- The Council's Landscape section assessed that low to mid density housing, appropriate for the rural context, may be suitable. Sufficient space would be allowed for tree belts, individual trees and hedgerows.
- Roads Planning had no objections to the development of the site, with the existing road deemed to be acceptable. The potential for realising a positive benefit in addressing the sub-standard junction of the separate road to the south west of Romanno House was acknowledged.
- Our Client confirmed that there are no 'ransom strips' which would represent a constraint to development in respect of access or any other aspect of the site's development.
- Education infrastructure (primary and secondary) was assessed as having capacity.
- Economic Development considered the site to represent "logical infill", a point which our Client wholeheartedly agrees with.
- The Assessment stated that there is no evidence to suggest that historic uses may present development constraints. The only previous use known is a small stone quarry to the extreme south east of the site approximately 35 years ago.

In terms of flood risk, the site is not shown to be at flood risk within the SEPA 1 in 200 year indicative flood mapping and the Council's Flood Officer has previously (during the emergence of the Housing SG) confirmed that there would be no objections to the site's development on the grounds of flood risk. It is noted, however, that at that time SEPA commented upon a burn above the site which has been culverted through Romanno Mains and suggest that this could present a flood risk. It should be noted that the site would merely extend adjacent development which would appear, contextually, to experience the same topography as the proposed site. A Flood Risk Assessment would, however, form part of any planning application for this site to address the matter and also the potential for surface water run-off from higher ground.

In terms of comments on sewerage capacity, it is accepted that a new sewage treatment plant would be required as part of the development.

It is noted that the MIR contains several large sites within the Northern Housing Market Area with 'preferred' status, parts of which are acknowledged to be subject to flood risk and where full Flood Risk Assessments are naturally required at a future date. The fact that an FRA had not been provided at Call

for Sites or MIR stage, particularly when the Council's flood officer has no objection, appears to have been an inconsistent reason to include within the reasons stated for exclusion of the site within the Housing SG.

The site could be readily assimilated into the landscape setting through implementation of low to medium density housing which would be kept back from rising ground. Extension of the existing woodland shelterbelt with appropriate tree species would form a defensible edge to the south east and enclose the development which would appear as a natural 'infill' extension to existing housing on Halmyre Loan. The site cannot be seen from the nearby A701.

In terms of the Council's adopted policy PMD2 'Quality Standards - Placemaking and Design', a development of the scale proposed would be based upon a clear understanding of the context of this part of Romanno Bridge and, given the scale and 'infill' nature of the development, it is considered that the proposal would not be detrimental to the landscape character. It is noted that there are no international, national or local landscape designations over, or in close proximity, to the site.

There is known difficulty with securing short and medium term allocations for residential development within the Northern Housing Market Area generally. LUC's '*Western Rural Growth Area: Development Options Study*' encompasses much of the Northern Housing Market Area and was commissioned to identify and assess options for housing and business and industrial land within Central Tweeddale over an area stretching from Eddleston to beyond Walkerburn. It is acknowledged that Romanno Bridge lies to the west of the Rural Growth Area (RGA), (as identified in SES Plan Proposed Strategic Development Plan) but it does lie within the Northern Housing Market Area. The only other sites identified in the MIR for potential allocations within in the Northern Housing Market area are:

Dolphinton ADOLP004 (housing)	10 units	(Preferred)
Peebles, AEEB056 (housing)	150 units	(Preferred)
Eddleston AEDDLE008 (housing)	40 units	(Alternative)
Eddleston AEDDL009 (housing)	35 units	(Alternative)
Eshiels MESHIO02 (Mixed use)	40 units	(Preferred)
Eshiels MESHIO01 (Mixed use)	200 units	(Preferred)

Brief comment is now made upon five of the sites with allocations in the MIR which lie in the Northern Housing Market Area.

Eshiels (MESHIO01 and MESHIO02)

A separate representation has been made by Ericht Planning on behalf of many members of the Eshiels Community who object to the 'preferred allocations' for 240 new houses as part of mixed use development proposals (MESHIO01 and MESHIO02). The MIR Site Assessment for those sites highlights several potentially constraining factors in relation to lack of sewerage infrastructure, lack of roads infrastructure and archaeological constraints.

Landscape impact is also a major consideration given the Eshiels sites' location in the heart of the Tweed Valley Special Landscape Area. Further, landowner/ developer willingness to progress with development within those significant sites does not appear to have begun meaningfully. Relying on such a large overall allocation at Eshiels to deliver housing within the LDP timeframe when minimal investigation into deliverability and viability has been carried out would seem a risky strategy.

The importance of landowner and developer willingness to engage in taking sites forward for development is being acknowledged with allocations for 95 units in the current LDP being proposed for removal by the Council in the next LDP due to lack of landowner or developer interest in progressing allocated sites for development. The designation of large sites as '*Preferred*' options when landowner/ developer willingness is unknown may be regarded as premature.

Eddleston (AEDDLE008 and AEDDL009)

In terms of the Eddleston allocations, we would comment that given the lack of landowner /developer interest of the already-allocated Eddleston sites at Burnside and Bellfield, it would appear to be premature to place any reliance on the two additional identified 'alternative' sites in the village to contribute to housing during the Plan period. The potential flood risk issues are also noted.

Peebles (AEEB056)

Whilst Peebles lies within the RGA, it is noted that the development pressure on the northern side of the town is already high with the proposed significant (150 unit) 'preferred' allocation on land south of Chapelhill Farm following swiftly on top of the allocations (and recent development) of several adjacent sites accessed off Rosetta Road. The northern link to the A703 remains single track in nature and the required alternative access solution to provide a suitable link appears to have undergone minimal investigation. Indeed, the Roads Planning Officer, in the MIR Site Assessment, highlights potential third party landownership issues with achieving a satisfactory access, although a new link with the A703 is stated as essential within the MIR 'Site Requirements'. It is thus unclear if this site is able to be developed within the LDP2 timeframe.

Further, it is considered that a development at this location would appear incongruous and detached from the rest of Peebles and would have a detrimental impact upon the landscape setting of the town. It would be highly visible from the A703, a situation which would be exacerbated if development took place on the sloping western part of the site.

Summary

Romanno Bridge is a popular place in which to live, mainly due to its countryside setting, combined with reasonable public transport links to both Edinburgh and Peebles and beyond. It is important that land allocations are made in sustainable and sought after locations where development proposals will come forward and be deliverable in a reasonable time-frame on account of demand and lack of major infrastructure constraints. There are no known insurmountable constraints to development at the subject site and whilst, admittedly, the land area is significantly smaller than that at Eshiels or Chapelhill,

Peebles, there is genuine prospect of deliverability within the Plan period and the site can thus make a small but meaningful contribution to housing land within the Northern Housing Market Area.

Our Clients believe that the site at Romanno Bridge should be progressed within an allocation within the LDP2 for housing development, with an indicative capacity of 11 units for the following key reasons:

- The site is considered to be capable of being delivered within the Local Development Plan lifespan due to lack of insurmountable infrastructure constraints, including a lack of any 'ransom strips'.
- The scale of development would be in keeping with the scale of this part of Romanno Bridge and represents logical infill development adjacent to existing development.
- There are no landscape designations over the site. Development can be assimilated into the landscape setting and contained by appropriate structure planting to extend the existing shelterbelt.
- Development would be contained within the lower parts of the site.
- The site is appropriate for low to medium density housing, in keeping with existing development.
- The site is not visible from the A701 and would not give rise to significant visual impact.
- The existing access (Halmyre Loan) can be used to access the development.
- The proposal offers the potential to address an adjacent access road which has a sub-standard junction with the A701, as acknowledged by the Council's Roads Officer.
- There is considered to be over-reliance on large sites in the Northern Housing Market Area, as noted, where deliverability within the LDP2 lifespan is uncertain given infrastructure constraints, potential questions over viability (given significant new infrastructure requirements) and lack of knowledge over landowner willingness, as highlighted within LUC's Report.
- The subject site can make a relatively small but meaningful contribution to housing land within the Northern Housing Market Area within the lifespan of LDP2.

Our Client requests that the comments within this submission are taken into account and an allocation for housing development with an indicative site capacity of 11 units is thus made for the site.

Yours faithfully



Kate Jenkins

ERIGHT PLANNING