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Scottish Borders Council  
Planning Policy & Access Team  
Council Headquarters  
Newton St Boswells  
Scottish Borders  
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27135/SI/  
31 January 2019

For the attention of [REDACTED]

Dear Sir

**SCOTTISH BORDERS COUNCIL – LOCAL DEVELOPMENT PLAN 2 - MAIN ISSUES REPORT REPRESENTATION - SOUTH WEST OF WHITEHAUGH, PEBBLES (REFERENCE: APEEB049)**

On behalf of our client, [REDACTED], please find enclosed herewith a representation to Scottish Borders Council's Local Development Plan 2 - Main Issues Report for the site nominated as South West of Whitehaugh, Peebles (Reference: APEEB049).

We would be pleased to discuss our submission with you in greater detail, as required. Should you require clarification on any matters, please do not hesitate to contact the undersigned via the following email address: [steve.iannarelli@bartonwillmore.co.uk](mailto:steve.iannarelli@bartonwillmore.co.uk) or alternatively on the above telephone number.

In the meantime, we would be grateful if you could confirm safe receipt of this letter and enclosures.

Yours faithfully

[REDACTED]

**STEVE IANNARELLI**  
Senior Planner

Enc: Representation



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# Site South West of Whitehaugh Peebles

## **Representation to:**

Scottish Borders Council - Local Development Plan 2

Main Issues Report 2018

Prepared on behalf of [REDACTED]

January 2019

## Site South West of Whitehaugh, Peebles

Representation to:

Scottish Borders Council - Local Development Plan 2  
Main Issues Report 2018

Prepared on behalf of [REDACTED]  
January 2018

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Date: January 2019

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### APPENDICES:

Appendix 1	Site Location Plan
Appendix 2	Indicative Site Layout
Appendix 3	Access & Facilities Plan

## 1.0 INTRODUCTION

- 1.1 This representation has been prepared by Barton Willmore on behalf of [REDACTED] UK Ltd ([REDACTED]) to Scottish Borders Council ('SBC') in relation to SBC's Local Development Plan 2 ('LDP2') Main Issues Report ('MIR') with respect to their land interests on land to the south west of Whitehaugh, Peebles ('the Site') (LDP2 MIR Reference: APEEB049). Please refer to Appendix 1 (Site Location Plan) for further details.
- 1.2 The Site has already been identified as a 'safeguarded' potential longer term housing site within the adopted SBC Local Development Plan 1 ('LDP1') with an indicative capacity of 106 units (LDP1 Reference: SPEEB003). It was also considered as a potential mixed use site as part of SBC's Housing Supplementary Guidance ('Housing SG') call for sites process (Housing SG Reference: APEEB049/50) but subsequently discounted in the short term. However, it is considered that the Site is effective, that there are no fundamental constraints to its development, and that it is ready to come forward for development within the lifetime of the LDP2.
- 1.3 This representation therefore **supports** the Site's status as a longer-term housing site within the LDP2 MIR but we **object** to the Site's exclusion as a preferred housing site as it is contended that the Site is capable of coming forward in a shorter timescale and should, therefore, be identified as an allocated housing site within the LDP2 Proposed Plan.
- 1.4 Please refer to Appendix 2 (Indicative Site Layout) which outlines a concept layout and capacity for the proposed housing site, alongside associated infrastructure and landscaping opportunities.
- 1.5 Although promoted separately, it is considered that the Site would form a logical continuation of development from the [REDACTED] land at 'East of Kittlegairy View' (Reference: APEEB054) which is also being promoted by Taylor Wimpey through this LDP2 MIR consultation process.
- 1.6 This representation should be considered alongside the following accompanying supporting information:
- Site Location Plan (Appendix 1);
  - Indicative Site Layout (Appendix 2); and
  - Access & Facilities Plan (Appendix 3).

## 2.0 BACKGROUND CONTEXT & SITE HISTORY

### Previous Site Promotion

#### LDP1 Site Assessment

- 2.1 SBC will be aware that the Site has previously been promoted through the LDP1 and earlier Housing Supplementary Guidance ('Housing SG') consultation process (Site Code: APEEB049 and APEEB050) seeking to ensure its status as a preferred housing site. It is considered that the Site presents an ideal opportunity to secure development on an accessible, effective site which can be brought forward without any significant barriers to development. This land is currently utilised as improved grassland and for sheep grazing.
- 2.2 As previously stated, this site is being promoted by [REDACTED] who have a proven track record of delivering, and selling, housing in Peebles. The momentum they have generated through the success of their other developments, including their adjacent Kingsmeadows site, should be recognised.

#### Housing SG Assessment

- 2.3 Despite this, the Site was assessed through the Housing SG consultation process and was not included as a preferred housing site. Having reviewed the Housing SG Site Assessment and the reasons set out by SBC for its non-inclusion, it is clear that - although viewed as an acceptable site in principle - before the Site could come forward (and be considered effective) SBC considers that a new bridge crossing (over the River Tweed) would be required alongside upgrading of Glen Road and a vehicular connection through to Whitehaugh. **This is a position that we strongly disagree with as highlighted within the Section 4 of this representation.**

## 3.0 RESPONSE TO THE LDP MIR

### LDP2 MIR Assessment

- 3.1 The LDP2 MIR Site Assessment states that the Site is acceptable for development but that constraints relating to the potential requirement for a new crossing over the River Tweed should be investigated before the Site is allocated. Again, based on technical assessment undertaken on behalf of AWG/[REDACTED], this is a position that our client fundamentally **disagrees** with.
- 3.2 The LDP2 MIR approach also suggests that the Western Rural Growth Area: Development Options Study ('WRGA Options Study') prepared by LUC Consultants on behalf of SBC, identifies that other '*more suitable sites*' for housing could be included within the LDP2 MIR as preferred housing sites and subsequently allocated as housing sites within the LDP2 Proposed Plan. Critically, the LDP2 MIR Site Assessment identified that the Site will be included as a longer term option for housing in the future, to allow further investigations in relation to any new river crossing and potential flooding issues to be overcome. However, this is not expressly mentioned within the main body of the LDP MIR. We understand through separate discussions with SBC's Forward Planning Team that this would be the case. If not, we would also **object** to the Site's exclusion as a longer term mixed use site.
- 3.3 For the reasons set out in the following sections, it is considered that all the respective site requirements within the LDP1 Settlement Profile could be met - an outcome reaffirmed by the LDP2 MIR Site Assessment - and there are feasible solutions to resolve any technical constraints, largely relating to a second road bridge over the River Tweed and to potential heritage matters.
- 3.4 This outcome would allow the Site to come forward for development within the LDP2 timescales, and sooner than anticipated by SBC.
- 3.5 Therefore, our response to these matters and the LDP2 MIR chapters and respective policy text is provided below, outlining on what basis we object to the Site's exclusion as a preferred housing site in the LDP2 MIR and that we respectfully request that this Site is included as an allocated housing site within the LDP2 Proposed Plan.

### Review of Chapter 3: Vision Aims and Spatial Strategy

#### Question 1 - Do you agree with the main aims of the LDP2?

- 3.6 We **agree** with the proposed strategy at **Paragraph 3.9** encouraging strategic growth within the three Rural Growth Areas and in particular the Western Borders/Peebles. We also **agree**

with SBC's strategy to provide a generous supply of housing at **Paragraph 3.3**. However, we **object** to the suggested strategy that the LDP2 will not require a significant number of new housing sites (i.e. SBC's position that there has been limited housing delivery on allocated housing sites, that there is an extensive housing land supply using existing allocated sites and on the reduced number of new houses required through the emerging SESplan 2).

- 3.7 We agree with Homes for Scotland's position that the SESplan 2 housing supply tables should be amended to resolve arithmetical errors in the Reporter's findings for the Examination (relating to the HNDAs backlog) and that this needs to be factored into SBC's development planning process for the emerging LDP.
- 3.8 We therefore contend that the proposed LDP2 MIR housing strategy - which includes a number of preferred housing sites in locations with a low market demand (and with potential constraints) - is flawed, given the potential risk to delivery. We therefore recommend that SBC look to identify further housing sites on effective land, in locations where developers have identified as a place where people want to live and where they wish to build.
- 3.9 Accordingly, allocating the Site for development would help contribute towards overall levels of housing delivery, increased affordable housing completions, more developer contributions for vital infrastructure and, ultimately, additional economic activity within the Borders.
- 3.10 In order to assist SBC in ensuring that its HLR and 5 year effective land supply is delivered going forward through the emerging LDP, we therefore recommend that the Site is brought forward as a housing site allocation within the LDP2 Proposed Plan.
- 3.11 In addition, we **agree** at **Paragraph 3.13** that there is a strong housing market in Peebles and that it is attractive to house builders. However, we disagree that there is a need for a second bridge prior to any housing being released on the southern side of the River Tweed.
- 3.12 Based on the technical assessments carried out on behalf of Taylor Wimpey, we do not consider that this is a prerequisite for future development, nor does it limit options within this location given that this perceived technical constraint (relating to bridge capacity) can be overcome, particularly in the short term. In this regard, commentary prepared by ECS Transport confirms that there is sufficient capacity on the bridge to accommodate further development and that there would not be unreasonable environmental nor safety impacts on Peebles High Street. Consequently, this outcome supports the proposals for housing development (and their allocation within the LDP2 Proposed Plan) on the southern side of the River Tweed. Please refer to Section 5 of this Report for further discussion.



## Review of Chapter 4: Growing Our Economy

Question 2 - Do you agree with the preferred option to retain the existing `Strategic High Amenity` site categorisation and amalgamate the remaining categories? Do you agree with any of the alternative options including to retain the current policy position? Or do you have another alternative option?

- 3.13 We **object** to the statement within **paragraph 4.5** that flooding and traffic congestion issues restrict the development of any sites on the Southern Side of the River as these potential constraints can be overcome (particularly for smaller sites or sites currently within the planning system) and could allow for the allocation and future development of housing sites on the southern side of the River without the need for a new bridge.

Question 6 - Do you agree with the preferred options for the provision of additional business and industrial land/mixed use land in the LDP2? Do you agree with the alternative option for mixed use land? Or do you have other alternative options?

- 3.14 In terms of mixed-use land allocations, we **object** to the preferred option that includes only one mixed-use (longer term) site (SPEEB008 - Land West of Edderston Ridge) within Peebles. We recommend that the Site, as a potential longer-term housing site, is included within the LDP2 MIR to accommodate future housing growth - particularly given the housing delivery constraints associated with the aforementioned mixed use site. Please refer to Section 4 of this report which provides our rationale to support this position.

## Review of Chapter 5: Planning for Housing

Question 7 - Do you agree with the preferred options for additional housing sites? Do you agree with the alternative options? Do you have other alternative options?

- 3.15 We **object** to the strategy that the LDP2 will not require a significant number of new housing sites given an established housing land supply, low completion rates and low housing land requirement. **We therefore recommend that the Site's previous long-term housing status is not only retained, but further strengthened, to identify it as a preferred housing site within the LDP2 MIR to support the delivery of housing within the Plan period.**
- 3.16 We also **object** to the preferred options for additional housing sites within/around Peebles. Specifically, that the Site has not been identified as a preferred housing site.
- 3.17 We note that the accompanying LDP MIR Site Assessment (for excluded sites) identified that `This site will remain as an identified longer term option for housing in the future and allow

time for further investigations regarding a river crossing'. Despite this, the main body of the LDP2 MIR does not identify the Site as a preferred or alternative longer-term housing site, however, we acknowledged that subsequent correspondence from SBC Forward Planning has confirmed this position. Again, if this is not the case, we **object** to the removal of this long term status within the LDP2.

## Review of Chapter 10: Planning Policy Issues

Question 18 - Do you agree with the suggested policy amendments identified in Appendix 3? Do you think there are any other policy amendments which should be referred to?

- 3.18 With respect to the Appendix 3 within the LDP2 MIR relating to amendments to LDP2 policy wording, we request that **Policy PMD4: Development Outwith Development Boundaries** is amended to remove any reference to SBC's Housing Land Audit. It is contended that consideration of any housing land shortfall should be assessed separately, at the time of determination, with the most up to date evidence base.

## 4.0 OVERCOMING TECHNICAL CONSTRAINTS

### LDP2 MIR Site Assessment Review

- 4.1 The Site is assessed in detail within SBC's MIR LDP2 (Excluded) Site Assessment. Within this assessment, we **agree** with SBC's initial comments stating that the Site is '*an acceptable site for development*'. We also contend that any potential constraints outlined by SBC within the LDP2 MIR Site Assessment can be overcome and that any other site requirements (i.e. within the LDP1 Settlement Profile for the Site) could be met to allow for the development of the Site within the Plan period. Therefore, we **object** to the Site's exclusion as a preferred housing site within the LDP2 MIR and we reaffirm that the Site should be allocated for housing within the LDP2 Proposed Plan.
- 4.2 In light of this site assessment, and our knowledge of the Site, it is clear that the key factors determining its suitability for development are as follows:
- Flooding & Surface Water Drainage;
  - Roads, Access and Bridge Capacity;
  - Biodiversity;
  - Settlement Boundary and Sustainability;
  - Landscape Designations;
  - Environmental Designations;
  - Scheduled Monument;
  - WRGA Options Study;
  - Public Transport;
  - Education;
  - Design Considerations including:
    - Site Layout & Design (See Section 5);
    - Landscape & Topography (See Section 5);
    - Ground Conditions (See Section 5); and
    - Infrastructure (See Section 5).

- 4.3 Each of the above issues has been considered below, and the following justification provides a rationale that reaffirms our client's position that there are no physical or environmental constraints that would prevent the Site from being developed for residential use immediately.

#### Flood Risk and Surface Water Management

*'SEPA have stated that a flood risk assessment would be required'.*

- 4.4 We confirm that a Flood Risk Assessment can be provided to address this requirement. Our initial assessments have outlined that the Haystoun Burn flows approximately 75m south of the Site boundary (from west to east). It is located approximately 8-10m lower than the ground level of the Site, with wooded banks sloping steeply up to the Site. It is therefore considered that there is a low risk of fluvial flooding within the Site.
- 4.5 Furthermore, the Indicative Site Layout demonstrates that sufficient buffers can be put in place to further minimise any potential impact flooding within the Site. Both foul and storm water drainage, together with SUDS treatment and storm water attenuation, if necessary, can all be dealt with, within the proposed site boundary. This would fully address this requirement.

#### *Roads, Access and Bridge Capacity:*

*'Roads Planning also state that development in this location is reliant on a new crossing over the Tweed...'*

- 4.6 We understand that SBC's Roads Planning team are of the opinion that development in this location, together with other sites to the south of the River Tweed in Peebles, would require a new bridge crossing. Specifically, SBC Roads consider that the existing bridge does not have sufficient capacity to accommodate traffic generated by the development of the Site. We strongly **disagree** with this position.
- 4.7 In this regard, this matter has been assessed in detail by Taylor Wimpey's Transport Consultants (ECS Transport) who have confirmed that the existing capacity of the bridge could comfortably accommodate additional trips associated with the development of the Site.
- 4.8 ECS Transport concluded that:
- The link capacity of the Tweed Bridge is not a constraint to further development on the southern side of the Tweed.
  - A conservative approach has been taken to the classification of the bridge which suggests a link capacity of 1,500 vehicles, whereas, the capacity in reality could be 2,166 two-way vehicles if classified correctly with the measured width.

- Therefore, even if traffic associated with committed development sites is included in the flows, the AM and PM two-way movements would increase to 1,327 and 1,263, respectively – well within the conservative capacity of 1,500 two-way vehicles.

4.9 Accordingly, traffic associated with the development of the Site could be accommodated over the bridge and its delivery would not result in detrimental impacts to the surrounding road network.

*'Development in this location is reliant on... vehicular linkage between the end of Glen Road and the roundabout at the southern end of Whitehaugh Park as well as the upgrading of Glen Road adjacent to Forest View.'*

4.10 We **disagree** that vehicle access to link with Glen Road would be required. Vehicular access to the Site can be achieved in the north east corner of the Site via a connection the existing turning roundabout at the southern end of Whitehaugh Park. This is technically preferable and offers the best solution given the topography constraints and need to consider gradient.

4.11 The main access road as shown within the Indicative Site Layout (Appendix 2) is of sufficient width to provide emergency access (typically 6m) and currently provides access to bus services which serve Whitehaugh Park. Notwithstanding this, the recent Kingsmeadows development by Taylor Wimpey provides linkages (pedestrian/cyclist and vehicular) to Whitehaugh Park and provides an alternative route between the Site and the main road network.

4.12 The Site will have road links west towards Peebles Town Centre, Edinburgh, Glasgow etc. and east towards the Border towns of Innerleithen, Selkirk, Galashiels, and those further afield. The B7062 will be capable of coping with any traffic generated by the development regardless of which direction vehicles travel in. With changes taking place in commuting habits and more home working taking place, plus the fact that commuters from Peebles travel in numerous directions, we do not see the Site being constrained by the existing transport links and road network and we **disagree** that an additional access via Glen Road is required.

## Biodiversity

*'The Site would have a potential minor impact on biodiversity'*

4.13 The Site and surrounding land have previously been surveyed to assess biodiversity value and appraise the likely presence of European Protected Species. There is no evidence of protected species using the Site. The habitats on the Site are very simple, reflecting the intensive use of the land and the modification or artificial creation of the habitats. As such, we **agree** that the overall ecological value of the Site is considered to be low.

- 4.14 Despite this, any potential impacts (suggested to be minor by SBC) could be comfortably addressed to ensure that adequate mitigation is provided, if required, to enhance the existing biodiversity within the Site. As such, we contend that there are no ecological constraints in the development of this Site for housing.

### Settlement Boundary and Sustainability

*'The Site is located on the edge of the settlement and has good access to services and facilities'*

- 4.15 We **agree** with SBC's site assessment that the Site is located within a sustainable location (on the southern edge of the Peebles settlement boundary) with good access to existing services and facilities. This is an important issue that should be afforded significant weight in progressing the Site as a preferred housing site in the LDP2 MIR.
- 4.16 We **agree** that the Site has good access to public transport, employment and services, due to its location adjacent to the existing settlement (refer to Appendix 3). The Site also has good links for pedestrians and cyclists, through a network of local paths and dedicated cycle lanes to the bridges over the Tweed and the local schools, thus providing safe walking routes to all local amenities. It should be noted that Cavalry Park Business Centre is only a short walk from the Site (550m) and the town centre is approximately 1.5km away. The primary school and secondary school, which serve this area of the town are also within a 20 minute walk of the Site, with a nursery close by in Cavalry Park Business Centre.

### Landscape Designations

*'Consideration should be given to the design of the overall site to take account of the Special Landscape Area, the adjacent SBC Garden and Designed Landscape and the setting of the adjacent Scheduled Monument. Additional landscape enhancement would also be required along with buffers to existing and proposed landscaping'.*

- 4.17 To address this requirement, [REDACTED] will arrange for separate assessments to be prepared to consider landscape, visual impact and heritage matters alongside potential opportunities for additional landscaping features that could enhance the existing landscape offer within/adjacent to the Site.
- 4.18 Whilst it is noted that there is sufficient separation between the Site and the setting of any historical designations (including the Scheduled Monument), the Indicative Site Layout incorporates landscape buffers along the southern and eastern boundaries to create visual separation between both areas - in direct response to the above requirement - and to further enclose the Site.

- 4.19 In addition, a large section within the northern part of the Site has been left undeveloped, due to significant topographical constraints, which allows for further opportunities to integrate with the surrounding area.
- 4.20 The Site is enclosed by established woodland and greenspace, which means that any built form will be sheltered within this natural environment. Building on this, the Indicative Site Layout contemplates the provision of a sensitively designed, high quality residential development with sufficient landscaping opportunities to complement the existing landscape character.
- 4.21 Therefore, the development of this site would consider the aforementioned landscape features/designations - ensuring that any future development would not compromise the existing landscape and heritage objectives for this area.

### Environmental Designations

*'Mitigation measures are required to prevent any impact on the River Tweed SAC/SSSI. Further assessment on nature conservation interest will also be required and mitigation put in place'.*

- 4.22 [REDACTED] environmental consultants have already considered potential impacts from the development of this (and other nearby sites) on the Haystoun Burn and subsequently the River Tweed SAC and SSSI. Consequently, any potential development of the Site would include detailed assessments to demonstrate that there would be no significant adverse impact on the qualifying objectives associated with the respective SAC and/or SSSI and that suitable mitigation could be provided (if required) to address any respective requirements.
- 4.23 This outcome accords with this requirement and we therefore **disagree** that the proximity of the River Tweed SAC/SSSI could be considered a constraint to the development of the Site.

### Scheduled Monument

*'Development should not take place in the required buffer area of the Scheduled Monument but rather that area should be left as open space. Enhancement of the footpath would also be required'.*

- 4.24 The Site is located over 150m to the north of the nearby Scheduled Monument, which is also separated from the Site by a tree-lined landscape buffer, an access track and an agricultural (grazing) field. Combined, these attributes provide sufficient separation and disassociation between the Site and the Scheduled Monument to preserve its setting. Moreover, given that the field containing the Schedule Monument is not proposed to be developed, any potential buffer requirements around the Scheduled Monument could comfortably be met.

- 4.25 In this regard, the Indicative Site Layout (Appendix 2) identifies that such a landscape buffer could be introduced to the south of the Site. This outcome would create enhanced landscape and visual screening opportunities to further protect the setting of the Scheduled Monument and should prevent any detrimental impacts - fully according with the respective site requirements above.

#### Western Rural Growth Area ('WRGA'): Development Options Study

*As part of the MIR process, LUC have undertaken a study in order to identify and assess options for housing and business & industrial land within Tweeddale. The reason for this study being that there are limited development allocations currently identified within the LDP and for the future, within the Tweeddale area, in comparison to other areas within the Scottish Borders. A number of housing and mixed use sites, including additional longer term sites have been identified. It is considered that there are constraints to the development of this site, which require further investigation, for example the river crossing. Therefore, it is considered that more suitable sites have been identified as part of the Tweeddale Study which could be included within the MIR as options for the LDP2. This site will remain as an identified longer term option for housing in the future, and allow time for further investigations regarding a river crossing.*

- 4.26 Critically, the WRGA Options Study does not assess the Site for housing development. Perhaps because it is already identified as a longer term housing site in the LDP1 - but this is not expressly identified. Rather, a comment has been included within this report stating that a *'small area south of Gallow Hill was considered, but a scheduled monument at this location would restrict development potential'*. Given that the Site is still identified as a longer term housing site within the LDP1 and, presumably, that SBC agreed that these matters could be adequately overcome, we are unsure why it would not be considered within this study to demonstrate its suitability for residential uses and its subsequent allocation in the LDP2 as a housing site.
- 4.27 There is no rationale to exclude the Site from the assessment, unless SBC are using this study to look beyond the LDP2. We assume that the Site has been excluded from the assessment based on an arbitrary assumption that a nearby Schedule Monument would fundamentally prevent its development - despite the fact that SBC's LDP2 MIR Site Assessment and SBC's adopted LDP1 (and corresponding LDP1 Settlement Profiles) confirm that the Site is suitable for longer term development and that future proposals should 'carefully consider' their design and scale to mitigate any potential impact on the nearby Scheduled Monument.
- 4.28 Therefore, if this study is to be used to identify sites for allocation within the LDP2, we request that the Site is considered within the WRGA Options Study assessment and, subsequently, that it is included as an allocated housing site within the LDP2 Proposed Plan.



## Other Potential Considerations

### Public Transport

- 4.29 The Site is well located in relation to existing public transport services (refer to Appendix 3). Kingsmeadows Road is served by two regular bus services which provide direct links to Peebles town centre and include an express service to Edinburgh. Other services from Peebles town centre provide links to Edinburgh and towns in the Scottish Borders such as Melrose, Galashiels, Biggar (South Lanarkshire) and West Linton.
- 4.30 There are bus stops on Whitehaugh Park, including one located adjacent to the Site on the existing turning circle at the south east corner of Whitehaugh Park that would be easily accessible by foot for future residents of this site and would ensure that all areas of the Site are within 400m of the public transport network. We therefore contend that this matter is not a constraint to the development of the Site.

### Education Provision

- 4.31 Previous independent view and population profile projections indicate that both the local Primary and Secondary schools would have sufficient capacity to accommodate the additional pupil numbers generated by this proposed development.
- 4.32 It should be noted that the capacity of the Site was originally identified as approximately 100 units (within the LDP1 Settlement Profile) however the revised layout now suggests that this would likely reduce unit numbers following detailed design. As such, a lower educational requirement will now be generated. On this basis, we believe capacity exists and that this matter should not be considered by SBC to be a constraint to the development of the Site.

### Conclusion – Overcoming Technical Constraints

- 4.33 Given that the aforementioned technical constraints can be overcome and that the respective site requirements can be met, it follows that the Site should be identified as a preferred housing site within the LDP2 MIR and subsequently taken forward as an allocated housing site within the LDP2 Proposed Plan.

## 5.0 PROVIDING AN APPROPRIATE DESIGN SOLUTION

### Site Layout & Design

- 5.1 Although the LDP1 Settlement Profile suggests that this safeguarded long-term housing site has an indicative capacity of 106 units, it is clear that the design and layout of the Site needs to be carefully designed to respect existing constraints – particularly heritage, access, topography, flooding, landscape and visual issues. These are all matters which featured in the LDP2 MIR site assessment.
- 5.2 The LDP1 site requirements (within the LDP1 Settlement Profile) outline that:
- *Provision of a new bridge linking north and south of the River Tweed*
  - *A vehicular link will be required between the end of Glen Road and Kingsmeadows Road via the Whitehaugh land. The upgrading of Glen Road adjacent to Forest View will be required*
  - *Consideration should be given to the design of the overall site to take account of the Special Landscape Area*
  - *Enhancement of the woodland along the north east side of the Site and landscape buffer around each side of the Site. The long term maintenance of landscaped areas must be addressed*
  - *Assessment of the archaeological site on the Sites and Monuments Record should be undertaken and appropriate mitigation measures carried out • Careful consideration of the design and scale within the development to mitigate the potential impact on the nearby monument*
  - *Development should not take place within the setting of the nearby Scheduled Monument but rather that area should be left as open space*
  - *Provision of amenity access within the development for pedestrians and cyclists. Links to the footpath network to be created and amenity maintained and enhanced • Mitigation measures are required to prevent any impact on the River Tweed Special Areas of Conservation/Sites of Special Scientific Interest*
  - *Further assessment on nature conservation interest will also be required and mitigation put in place*
  - *A flood risk assessment is required to assess the flood risk from the Haystoun Burn.*
- 5.3 With the exception of the second bridge crossing, it is clear that the development of the Site could be undertaken to address these LDP1 site requirements.

- 5.4 Based on a revised site capacity, an Indicative Site Layout has been produced (refer to Appendix 2) which has responded to these technical constraints, and the specific issues raised by SBC within the Site assessment within both the Housing SG and LDP1 Settlement Profile.
- 5.5 Consequently, the Indicative Site Layout has been designed to incorporate a landscape buffer along the southern, eastern and northern boundaries. This provides sufficient landscape buffers and a design solution that responds to these constraints and respects the natural and historic setting of the nearby sensitive interfaces. This outcome also minimises direct views towards the Site from other locations.
- 5.6 The Indicative Site Layout incorporates a design solution that sits alongside the existing established woodland. This outcome allows for the creation of a positive residential environment and also demonstrates that a sensitively designed, high quality residential development can be provided within the Site. The proposed density is such that the resultant units would be a mixture of detached and semi-detached homes, along with 25% affordable housing provision.
- 5.7 The capacity of the site has also been reduced to respect the topography and other site features. Cumulatively, these outcomes would ensure that there would be no significant detrimental impacts to landscape, environmental or historical objectives and/or designations within the surrounding area.
- 5.8 Please refer to Appendix 2 (Indicative Site Layout) which demonstrates how the Indicative Site Layout takes cognisance of, and responds to, potential site constraints, the character of the nearby area and the respective LDP1 site requirements.

### **Landscape & Topography**

- 5.9 The masterplan now incorporates a green/landscape buffer along all site boundaries, in direct response to the above requirement. A large section within the north of the Site has also been left undeveloped due to significant topographical constraints, and this allows a sufficient setback from existing properties and to the existing woodland - ensuring that the Site integrates visually with the surrounding area.
- 5.10 The Site is enclosed by established woodland and greenspace, allowing for built for to be sheltered within this natural environment.
- 5.11 Any future development would consider the Special Landscape Area and would include landscape/visual assessments to demonstrate that the development of the Site would not compromise landscape objectives for this area.

## Ground Conditions

- 5.12 No previous development has been undertaken on the Site and historical maps indicate that the Site has supported undeveloped agricultural land from at least 1859 until the present day.
- 5.13 Given the Site's green field nature and knowledge of ground conditions of the adjacent Kingsmeadows site which has been developed by [REDACTED] (2010 to 2016), it is considered likely that ground conditions will not restrict development of the Site. There are no overhead pylons on or near to the Site. There are no health and safety exclusions zones either covering the Site or within proximity to the Site.

## Infrastructure

- 5.14 There is adequate capacity (Electricity/Gas/Water/Foul Drainage) available to service the proposed development. There are connections to all services at the Site boundary with the adjacent Kingsmeadows site, also developed by [REDACTED]. There were servicing network upgrades undertaken during the development of the adjacent Kingsmeadows site in order to accommodate future development in the area.

## 6.0 CONCLUSION

- 6.1 The principle of residential development on the Site has already been established through its inclusion as a 'safeguarded' longer term housing site within the adopted SBC LDP1.
- 6.2 [REDACTED] are fully committed to achieving development on this site in accordance with a programme of phasing agreed with SBC. To deliver this goal, a range of 'effective' sites are required. In this instance, it is abundantly clear that the Site has sufficient capacity and site characteristics to accommodate this requirement.
- 6.3 It appears that the key matters which are acting as a barrier to the Site progressing are perceived technical constraints relating to flooding, drainage and access.
- 6.4 However, as detailed above, technical studies and site appraisal have demonstrated, with confidence, that these matters can be addressed. We therefore support the Site's retention as a safeguarded longer term housing site within the LDP2 (albeit, we note that this is not expressly identified within the main body of the text but is mentioned within the LDP2 MIR Site Assessment).
- 6.5 Despite this, we object to the Site's exclusion as a preferred housing site within the LDP2 MIR given that it is effective and deliverable and we therefore request its inclusion as an allocated housing site within the LDP2 Proposed Plan.
- 6.6 Further design work has shown that the Site can be designed to integrate effectively with the surrounding area and also incorporate the necessary buffers - as sought by SBC - to provide adequate visual separation and mitigate against landscape, visual and heritage constraints. By virtue of its reduced capacity the Site presents a genuine short term option for delivery, capitalising on the momentum already generated by [REDACTED] in delivery the adjacent development at Kingsmeadows.
- 6.7 In addressing the fundamental issue of bridge capacity, a recent assessment by ECS Transport provides robust evidence which demonstrates that **traffic associated with development on the Site, even when considered in a cumulative scenario with other sites coming forward, can be accommodated over the bridge** and would not result in detrimental impacts to the surrounding road network. A second river crossing is therefore not considered to be required to allow for the future allocation of this site (or other sites south of the River Tweed) for housing within the LDP2.
- 6.8 Accordingly, the allocation of this site within the LDP2 Proposed Plan is considered to be acceptable given that it has been demonstrated that any potential constraints relating to landscape, heritage and bridge capacity can be overcome.

- 6.9 We therefore respectfully request that the Site (Site Reference: APPEB049 – South West of Whitehaugh) is identified as a preferred housing site within the LDP2 MIR and subsequently allocated as a housing site within the subsequent LDP2 Proposed Plan.



## **APPENDIX 1**



The scaling of this drawing cannot be assured

Revision	Date	Drn	Chk
-	-	-	-

**LEGEND**

-  Site Boundary
-  Proposed Access



Project  
South West Whitehaugh, Peebles

Drawing Title  
Site Location Plan

Date	Scale	Drawn by	Check by
30.03.16	NTS	BB	AF

Project No	Drawing No	Revision
24050	Id03b	-

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# Site Location Plan



## APPENDIX 2

The scaling of this drawing cannot be assured

Revision	Date	Drn	Chk
-	-	-	-



Project  
Whitehaugh  
Peebles  
Drawing Title  
Indicative Masterplan

Date	Scale	Drawn by	Check by
25.01.17	1:1250@A3	MW	CL
Project No	Drawing No	Revision	
27137	ind01	01	

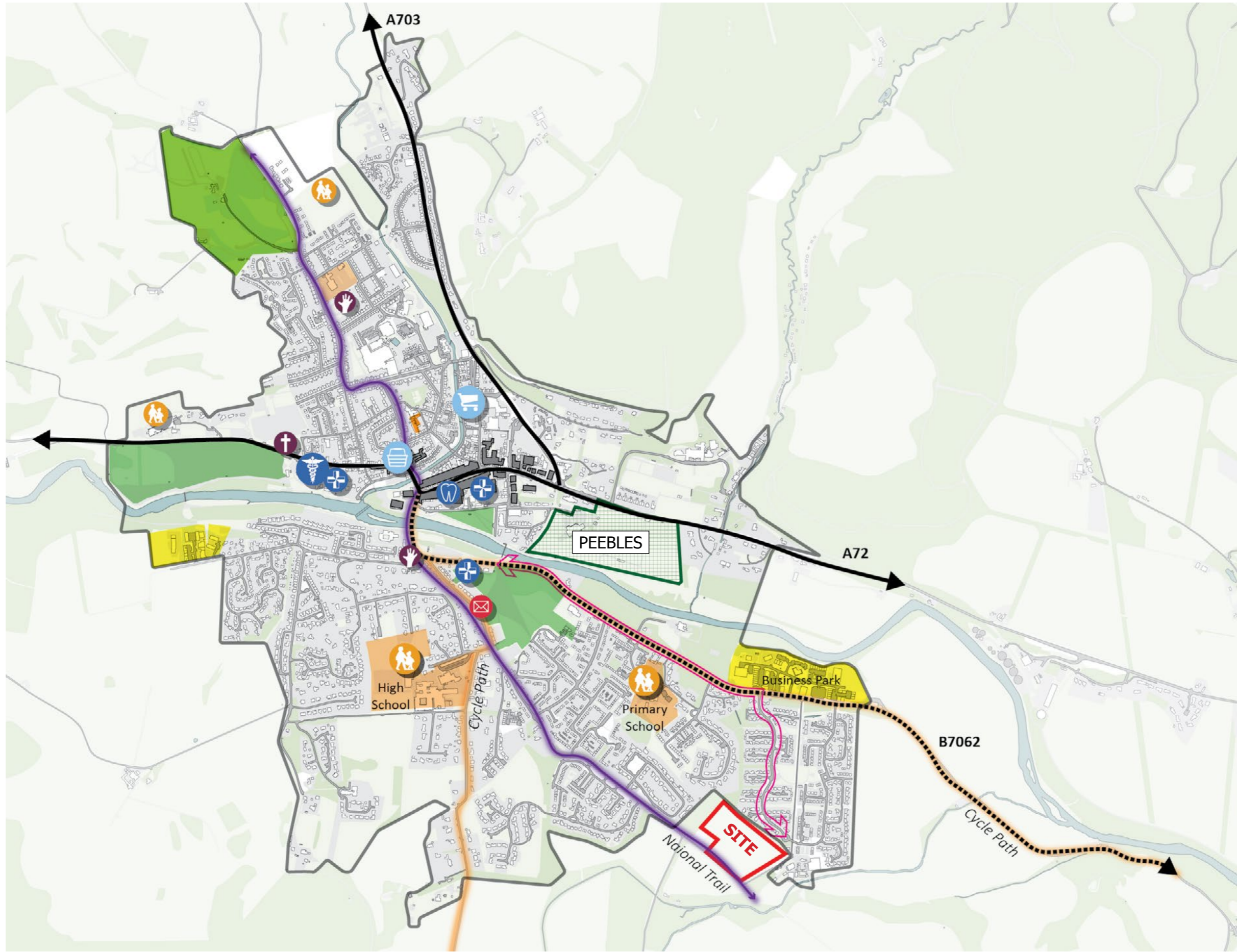
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## **APPENDIX 3**



The scaling of this drawing cannot be assured

Revision	Date	Drn	Chk
-	-	-	-

**LEGEND**

- Site Boundary
- Large Supermarket
- Small Supermarket
- Post Office
- School
- Hospital
- Dentist
- Pharmacy
- Place of Worship
- Community Centre
- Bus Routes

Project  
South West Whitehaugh, Peebles

Drawing Title  
Location Plan  
Access and Facilities

Date	Scale	Drawn by	Check by
30.03.16	NTS	BB	AF

Project No	Drawing No	Revision
24050	Id03a	-



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# Access and Facilities Plan

## Response ID ANON-7TG7-FA45-S

Submitted to **LDP2 - Main Issues Report**

Submitted on **2019-01-31 15:02:34**

### Data protection

#### About you

**Are you responding as an: individual, organisation, or an agent acting on behalf of a client?**

Agent

#### Agent

**If you are responding as an agent on behalf of a client, please provide details below:**

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01312207777

**Email address:**

steve.iannarelli@bartonwillmore.co.uk

**Name:**

Taylor Wimpey UK Ltd

**Address line 1:**

per

**Address line 2:**

**Address line 3:**

**Town/ City:**

Per Agent

**Postcode:**

**Contact number:**

**Email address:**

### Vision aims and spatial strategy

#### Question 1

**Q1 Agree aims LDP2:**

We agree with the proposed strategy at Paragraph 3.9 encouraging strategic growth within the three Rural Growth Areas and in particular the Western Borders/Peebles. We also agree with SBC's strategy to provide a generous supply of housing at Paragraph 3.3. However, we object to the suggested strategy

that the LDP2 will not require a significant number of new housing sites (i.e. SBC's position that there has been limited housing delivery on allocated housing sites, that there is an extensive housing land supply using existing allocated sites and on the reduced number of new houses required through the emerging SESplan 2).

We agree with Homes for Scotland's position that the SESplan 2 housing supply tables should be amended to resolve arithmetical errors in the Reporter's findings for the Examination (relating to the HNDA backlog) and that this needs to be factored into SBC's development planning process for the emerging LDP.

We therefore contend that the proposed LDP2 MIR housing strategy - which includes a number of preferred housing sites in locations with a low market demand (and with potential constraints) - is flawed, given the potential risk to delivery. We therefore recommend that SBC look to identify further housing sites on effective land, in locations where developers have identified as a place where people want to live and where they wish to build.

Accordingly, allocating our client's Site for development would help contribute towards overall levels of housing delivery, increased affordable housing completions, more developer contributions for vital infrastructure and, ultimately, additional economic activity within the Borders.

In order to assist SBC in ensuring that its HLR and 5 year effective land supply is delivered going forward through the emerging LDP, we therefore recommend that the Site is brought forward as a housing site allocation within the LDP2 Proposed Plan.

In addition, we agree at Paragraph 3.13 that there is a strong housing market in Peebles and that it is attractive to house builders. However, we disagree that there is a need for a second bridge prior to any housing being released on the southern side of the River Tweed.

Based on the technical assessments carried out on behalf of Taylor Wimpey, we do not consider that this is a prerequisite for future development, nor does it limit options within this location given that this perceived technical constraint (relating to bridge capacity) can be overcome, particularly in the short term. In this regard, commentary prepared by ECS Transport confirms that there is sufficient capacity on the bridge to accommodate further development and that there would not be unreasonable environmental nor safety impacts on Peebles High Street. Consequently, this outcome supports the proposals for housing development (and their allocation within the LDP2 Proposed Plan) on the southern side of the River Tweed. Please refer to the separate representation and accompanying documentation for further discussion.

## **Growing our economy**

### **Question 2**

#### **Q2:**

We object to the statement within paragraph 4.5 that flooding and traffic congestion issues restrict the development of any sites on the Southern Side of the River as these potential constraints can be overcome (particularly for smaller sites or sites currently within the planning system) and could allow for the allocation and future development of housing sites on the southern side of the River without the need for a new bridge.

#### **Q2 upload:**

No file was uploaded

### **Question 3**

#### **Settlement business allocated:**

#### **Upload Q3:**

No file was uploaded

### **Question 4**

#### **Business Use Towns:**

#### **Upload Q4:**

No file was uploaded

### **Question 5**

#### **Land delivery effectively:**

### **Question 6**

#### **Agree?:**

In terms of mixed-use land allocations, we object to the preferred option that includes only one mixed-use (longer term) site (SPEEB008 - Land West of Edderston Ridge) within Peebles. We recommend that our client's Site, as a potential longer-term housing site, is included within the LDP2 MIR to accommodate future housing growth - particularly given the housing delivery constraints associated with the aforementioned mixed use site. Please refer to our separate representation for further discussion.

#### **Upload Q6:**

No file was uploaded

## **Planning for housing**

## Question 7

### Housing agree?:

We object to the strategy that the LDP2 will not require a significant number of new housing sites given an established housing land supply, low completion rates and low housing land requirement. We therefore recommend that the previous long-term housing status of our client's site is not only retained, but further strengthened, to identify it as a preferred housing site within the LDP2 MIR to support the delivery of housing within the Plan period.

We also object to the preferred options for additional housing sites within/around Peebles. Specifically, that our client's Site has not been identified as a preferred housing site.

We note that the accompanying LDP MIR Site Assessment (for excluded sites) identified that 'This site will remain as an identified longer term option for housing in the future and allow time for further investigations regarding a river crossing'. Despite this, the main body of the LDP2 MIR does not identify our client's Site as a preferred or alternative longer-term housing site, however, we acknowledged that subsequent correspondence from SBC Forward Planning has confirmed this position. Again, if this is not the case, we object to the removal of this long term status within the LDP2.

In addition, the LDP2 MIR Site Assessment states that our client's Site is acceptable for development but that constraints relating to the potential requirement for a new crossing over the River Tweed should be investigated before the Site can be allocated. Again, based on technical assessment undertaken on behalf of AWG/Taylor Wimpey, this is a position that our client fundamentally disagrees with.

The LDP2 MIR approach also suggests that the Western Rural Growth Area: Development Options Study ('WRGA Options Study') prepared by LUC Consultants on behalf of SBC, identifies that other 'more suitable sites' for housing could be included within the LDP2 MIR as preferred housing sites and subsequently allocated as housing sites within the LDP2 Proposed Plan.

Critically, the LDP2 MIR Site Assessment identified that our client's site will be included as a longer term option for housing in the future, to allow further investigations in relation to any new river crossing and potential flooding issues to be overcome. However, this is not expressly mentioned within the main body of the LDP MIR. We understand through separate discussions with SBC's Forward Planning Team that this would be the case. If not, we would also object to the Site's exclusion as a longer term mixed use site.

This outcome would allow our client's Site to come forward for development within the LDP2 timescales, and sooner than anticipated by SBC.

Therefore, our response to these matters and the LDP2 MIR chapters and respective policy text is provided below, outlining on what basis we object to the exclusion of our client's as a preferred housing site in the LDP2 MIR and that we respectfully request that it is included as an allocated housing site within the LDP2 Proposed Plan. Please refer to the accompanying documentation for further discussion.

### Upload Q7:

No file was uploaded

## Question 8

### Housing countryside:

### Upload Q8:

No file was uploaded

## Question 9

### Agree removed housing :

## Supporting our town centres

## Question 10

### Core Activity Areas:

## Question 11

### Berwickshire supermarket:

### Upload Q11:

No file was uploaded

## Question 12

### Develop contrib town:

## Delivering sustainability and climate change agenda

## Question 13

### Support alternative option:

#### **Question 14**

**National park:**

**Upload Q14:**

No file was uploaded

#### **Regeneration**

#### **Question 15**

**Agree redevelopment:**

**Upload Q15:**

No file was uploaded

#### **Settlement Map**

#### **Question 16**

**Oxnam settlement:**

#### **Question 17**

**Core frontage Newcastleton:**

#### **Planning policy issues**

#### **Question 18**

**Agree amendments appendix3:**

With respect to the Appendix 3 within the LDP2 MIR relating to amendments to LDP2 policy wording, we request that Policy PMD4: Development Outwith Development Boundaries is amended to remove any reference to SBC's Housing Land Audit. It is contended that consideration of any housing land shortfall should be assessed separately, at the time of determination, with the most up to date evidence base.

#### **Any other comments**

#### **Question 19**

**Other main issues:**

#### **Landowner details**

**Have you submitted any site suggestions in this consultation?**

Yes

**If yes, please confirm the site and provide the landowner details (if known) for each site you have suggested.:**

South West of Kittlegairy Road, Peebles (Reference: APEEB049) - As outlined within previous representations, the site is owned and fully controlled by Taylor Wimpey UK Ltd.