

**From:** [REDACTED]  
**Sent:** 31 January 2019 18:01  
**To:** localplan <localplan@scotborders.gov.uk>  
**Subject:** FW: LDP-MIR

Dear Sir/Madam

We would like our previous submission to be carried forward and considered as part of this MIR process and examination. The MIR has allocated lands for Business and Industry without consultation with the landowner. We seek at most that the site be allocated as a residential led mixed use opportunity as set out previously.

Since the Call for Sites stage there has been significant interest in developing the site for Affordable Housing and it is that which the landowner wishes to pursue in the near future.

We have also appended further background as to the need for further housing allocations in this town.

Regards

[REDACTED]

**Tim Ferguson**  
**Director**





3<sup>rd</sup> August 2017

Call for Sites  
Forward Planning Team  
Scottish Borders Council  
Newtown St Boswells  
Melrose  
TD6 0SA

## REPRESENTATION TO LOCAL DEVELOPMENT PLAN 2 (PERIOD 2021-2026) – CALL FOR SITES

██████████ - WINSTON ROAD, GALASHIELS

Dear Sir/Madam

### Introduction

We write on behalf of ██████████ Ltd and in relation to the above consultation. This representation relates to their site at the former Abattoir site at Winston Road, Galashiels and follows on from the previous submission relating to the subject site for the current LDP and supplementary guidance. In our previous submission we indicated that the site in question has a potential capacity for 114 housing units which falls within the Galashiels settlement and can be brought forward within the local plan period to help meet housing requirements.

The previous RAG Assessment identified the site as falling within the Amber Category meaning that a further Phase 2 assessment was completed which included a detailed site assessment and consultation with internal and external consultees. This assessment concluded that the site was assessed as **acceptable in principle for residential development** with the main concern being potential conflict with adjacent uses such as the overhead power lines.

We stress again that development on this site can be phased. 71 of these units can be brought forward (shown within Zone 1 on the proposed layout plan, Appendix 1) and are outwith the overhead line zone. So should there be a concern regarding deliverability the reduced number can be applied.

### Site Details

The site is the former abattoir site on Winston Road, Galashiels. The buildings are in the process of being demolished. It extends to approximately 2.5ha and is vacant brownfield land. The site is located within the Galashiels Development Boundary and thus close to existing utilities and infrastructure. It is within a highly sustainable location being located approx. 0.5 miles (10min walk) from Tweedbank Train Station, 1.5 miles (20min walk) to Galashiels Bus/Train Station, adjacent to bus stops that provide regular bus services to

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across the Scottish Borders and next to one of Scotland’s long distance walking/cycling routes, Southern Upland Way. The site is approximately 25mins walking distance from Galashiels Town Centre with access to a variety of services including schools, shops and a health centre.

## Opportunity

The site represents a brownfield development opportunity, one that relates well with the existing built up area, with existing residential properties to the west and the eastern boundary being contained by the River Tweed. The site adjoins an allocated mixed-use development opportunity site (MGALA003) which will compliment this use.

A key issue raised was potential conflict with adjacent uses which included a substation, overhead lines, sewage works, the railway line and an exclusion zone with gas pipeline running on the eastern boundary of the site. The site is located close to the River Tweed and not shown to be at flood risk within the SEPA 1 in 200 year indicative flood mapping. A flood risk assessment would not be required, as stated in the sites assessment.

Our initial assessments show adequate set-off distances can be put in place to allow phase 1 of the development to take place. The buildings on site are being demolished and the client is ready to come forward with a planning application. It is our intention to provide the following assessments as part of the application for the site:

- Noise Assessment
- Odour Assessment
- Engineering Assessment (Further details regarding the gas line and overhead power lines)
- Transport Assessment
- Contamination Assessment

It is not expected that any significant impacts would be raised and if necessary mitigation measures can be put in place.

This site was not brought forward during the previous call for sites process as a ‘preferred’ or ‘alternative’ site due to potential constraints associated with the site. We have outlined above that these constraints can be alleviated to bring forward the full allocation of 114 units. However, the appended layout plan submitted with this representation show that 71 houses (Zone 1) can be developed first and outwith noted power line areas.

## Conclusion

We believe that this site should be allocated for housing within the Local Development Plan 2021-2026 for the following reasons:

- It is deliverable within the Local Plan lifespan. The developer owns the land and has the finances and resources to bring forward the development within the plan period. The demolition process has already taken place and an application will be submitted in the near future. There has also been interest shown by a housing association.

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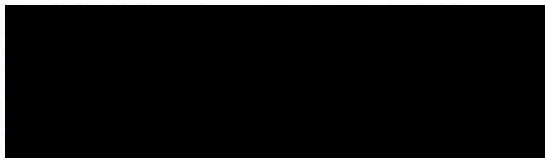
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- 71 units can be delivered outside the overhead power line zone. However our aim is to decommission these pylons and relay underground in order to get a maximum developable area.
- It is in a sustainable location: Highly accessible to Galashiels Town Centre, Bus services and Tweedbank Train Station
- It is a brownfield site and relates well to the existing built up area, with existing residential properties to the west and next to MGALA003, a mixed use development opportunity
- It has very easy access to utilities/infrastructure
- The site is not at risk of flooding from the River Tweed
- Affordable housing will be provided on part if not all of the site in accordance with Policy HD1
- There are no issues with access to the site.
- The site is considered acceptable in principle for residential development

We stress that it is highly important to allocate housing in the Scottish Borders where there is a strong demand to live and especially on vacant brownfield land within settlement boundaries. Should you wish to discuss any aspect of this representation in greater detail then please do not hesitate to contact Tim Ferguson on 01896 668 744.

Yours Faithfully



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Appendix: Site Layout





## Housing Opportunity

### Overview

The scale of housing required for the Scottish Borders area is set out within SESPlan and to be updated shortly once SESPlan2 has been formerly adopted.

### The Scottish Borders Local Development Plan (2016)

Ferguson Planning have reviewed the Local Development Plan 2 (LDP) and Main Issues Report (MIR). In particular the 'Growing our Economy' and 'Planning for Housing' Chapters as they both relate to the potential allocation of new housing lands for the LDP 2.

Prior to coming on to answering the related questions within the MIR we would make a number of observations in terms of approach or structure of the MIR report and potential improvements when producing the Proposed Plan.

### Current Housing Overview

There is a requirement for the LDP 2 Proposed Plan to use the most recent housing dataset that emanates from the SESPlan 2 Examination/Adoption. It is expected that a clearer picture will follow in the LDP 2 Proposed Plan as at that stage the latest housing audit will have fed into the process.

However, as part of this consultation process, while not always directly comparable, it is important to make some observations on housing requirements, supply and whether, at the current time, there is agreement that an effective 5 year land supply exists within the Scottish Borders (as required by SPP and SESplan policy guidance).

There is limited value going back over data that is considered out of date or superseded. However, it is worth touching upon housing supply and completions to understand whether there is or could be an effective five year housing land supply and whether additional housing is required in the future to ensure any shortfalls are addressed.

The current LDP touches upon the related HNDA and a yearly delivery target of 492 homes per annum. The SESplan Supplementary Guidance (SSG) target is almost twice that.

Table 1 'Housing Land Requirement' outlines the Scottish Borders Supplementary Guidance (SG) and which was based on the SESplan Supplementary Guidance (SSG).

**Table 1. Scottish Borders Housing Land Requirement**

Housing Requirement	2009-2025
2009-2019	9,650
2019-2024	3,280

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2025	492
<b>TOTAL</b>	<b>13,422</b>

The above requirement seeks the delivery of approximately 839 homes per annum. Whether one takes the HNDA or SSG it is critical to appraise whether that annual target and related effective 5 year land supply is being delivered.

It is noted by the Council within paragraph 5.1 of the LDP2 MIR that “a site is only considered to be effective where it can be demonstrated that within 5 years it will be free of constraints and can be developed for housing”.

With that in mind and the aforementioned yearly requirements mentioned previously one requires to look back and understand if that has been achieved and if not what actions are going to be taken to rectify the shortfall.

This is clearly outlined by the Reporter in the recent SESplan2 examination. The relevant extracts are outlined:

*3. Replace the final sentence of paragraph 5.11 with the following: “They will maintain a five year effective housing land supply at all times, within each Council area, measured against the five year housing supply targets. These are calculated by multiplying the annual average housing supply targets (Table 5.1) by five, and fully accounting for any deficit or surplus in completions against the housing supply target in previous years. Any deficits arising must be added to the 5-year all-tenure housing supply target to ensure that the whole target is achieved by the end of the plan period.”*

*4. Replace the first sentence of paragraph 5.12 with the following: “Where a shortfall in the five year effective land supply is identified, sites for greenfield housing development proposals may be allocated in Local Development Plans or granted planning permission to maintain a five years effective housing land supply, subject to the following criteria:”*

In simplistic terms, when one acknowledges the annual housing requirement and then reviews, for example, Appendix 2 - Table 9 and 10 of the adopted LDP it gives rise to significant concern regarding an effective five year land supply.

It shows that over the five years between 2010 and 2014/15 there was an average annual completion trend rate of some 367 dwellings per annum.

Further completion trends are outlined within the MIR (Table 4) and Scottish Borders Housing Audit 2018 (Table 8) for the years 2012/13 to 2016/17 showing an annual (average) housing delivery of only 298 dwellings. This indicates a fairly significant drop in housing delivery and cause for concern.

It would therefore suggest that, in annual terms, housing delivery is running at c. 65% below the required target and gives rise to significant questions as to how the current land supply can indeed be





considered “effective” now or into the future. This is further confirmed with the fact that historic trends show that, on average, 43% of completions are from windfall sites.

This leads to two general conclusions:

- There is considered not to be a five year effective land supply
- There is a “root and branches” review required of the sites deemed to be “effective” prior to the Proposed LDP2 consultation. It would appear from a review of available documentation that the sites allocated within the current LDP are not entirely “effective” and will not meet the five year supply targets in full as sought by SPP and SESplan.

The forthcoming Planning Bill does touch upon further gatechecks to better understand the actual delivery of allocated sites. While this may not mean the removal of some sites it does mean that they should be moved into a non-effective/constrained or long term development opportunity.

Undertaking the five year effective land supply study will also require a “reality check” and full understanding of the Scottish Borders Housing Market. This, in our opinion, should lead to the allocation of further deliverable sites in areas where people wish to live.

These are the locations that housebuilders want to develop in and are based on consumer demand. Recent trends show that the majority of housebuilding in the Scottish Borders has been by Affordable Housing providers. While this is commended, going forward, it is vital that a significant uplift in private sector housing is delivered across the Scottish Borders.

Not least to provide an appropriate tenure mix but also in that the private sector housing will assist in cross funding affordable housing in that particular area. Housebuilder interest (led by the market) is often in the more affluent towns where demand far outstrips supply both for mainstream and affordable housing. It is this issue that the LDP2 must address and pro-actively plan for.

### **Future Housing Overview**

Much of the LDP2 MIR quite rightly focuses on planning for the future of housing delivery in the Scottish Borders. It details the future housing supply targets within it and the appended technical note for the years 2021/22 to 2030/31 and, while slightly different years, relates to the SSG land requirements detailed within the Housing Supplementary Guidance (SG).

However, it is ill-advised to purely focus on those second ten year supply targets (ie. 2021/22 to 2030/32) as being all that LDP2 requires to concern itself with. There is a requirement to understand whether the first five year supply targets that form part of the current LDP are in fact being delivered in full as sought by SPP and SESplan. If not and, as previously outlined in the Reporter’s conclusions to the SESplan2, that shortfall must be carried forward and added to any future requirement.

The Housing Technical Note that informs the LDP2 MIR outlines in Table 4 what is considered to be the ‘Established Land Supply (2017 HLA)’. There are a number of concerns when reviewing the table. The first being looking at past trends in the ‘Effective (Years 1-5)’ supply against the annual delivery in reality.



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One requires greater clarity on how any sites considered “potentially effective” and “Post Year 7” have been arrived at and beyond that how the 1,827 units on constrained sites will be addressed. There is passing comment that the sites can be delivered within the plan period of LDP2. But that largely fails to address if or how the five year effective land supply, as it currently stands, will hit the target levels set? And if they are not what additional sites are being provided to ensure it is met.

Housing delivery analysis should be undertaken annually and local councils stepping in where shortfalls have been identified. We are now into 2019 and in the fourth year of the LDP. One would therefore expect to see all the sites identified to be completed or under construction.

While not exhaustive Table 2 on the following page outlines housing sites identified in the LDP but which we consider likely to be constrained in whole or part. Thus, the need to consider additional opportunities that are likely to be more deliverable within a shorter time frame.

**Table 2: Potential LDP (Adopted) Constrained / Non Effective Sites**

Market Area	Reference	Unit No.	Constraint
<b>Supplementary Guidance (SG) sites</b>			
Berwickshire HMA	SG-ACOLD011-Coldstream	100	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• No Planning Permission</li> <li>• Low Market Demand</li> <li>• Slow/Long Build Out Rate</li> <li>• Access/Infrastructure</li> <li>• Lower Dev. Density</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
Central HMA	SG-AKELSO26-Kelso	100	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• Phase 1 requires to be built out first</li> <li>• Access/landlocked in short term</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	SG-RKELSO002-Kelso	50	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• No Planning Permission</li> <li>• Significant Access/Parking Constraints</li> <li>• Listed Building / Capacity Constraints</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	SG-ASELK033-Selkirk	30	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• Potential Flooding Constraints</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	SG-MSELK002-Selkirk	75	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• No Planning Permission</li> <li>• Potential Flooding Constraints</li> <li>• Potential Contamination from Mill</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	SG-ATWEE002-Tweedbank	300	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• No Planning Permission</li> </ul>

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			<ul style="list-style-type: none"> <li>Major Transport &amp; Utility Infrastructure Required</li> <li>Potential Flooding Constraints</li> <li>Environmental/Landscape Constraints</li> <li>Unlikely to be started / completed by LDP 2021</li> </ul>
Western HMA	SG-MPEEB006-Peebles	30	<ul style="list-style-type: none"> <li>2019 Not Started</li> <li>No Planning Permission</li> <li>Phase 1 requires to be built out first</li> <li>Access/landlocked in short term</li> <li>Potential Flooding Constraints</li> <li>Unlikely to be started / completed by LDP 2021</li> </ul>
	SG-MPEEB007-Peebles	70	<ul style="list-style-type: none"> <li>2019 Not Started</li> <li>No Planning Permission / 'Live' Appeal in progress</li> <li>Unlikely to be started / completed by LDP 2021</li> </ul>
	<b>SG – Sub Total:</b>	<b>755</b>	

LDP (Adopted) Sites			
Central HMA	EA200-Ashkirk	20	<ul style="list-style-type: none"> <li>2019 Not Started</li> <li>Marketed. No Purchaser</li> <li>Low Market Demand</li> <li>Slow/Long Build Out Rate</li> <li>Access/Infrastructure</li> <li>Unlikely to be started / completed by LDP 2021</li> </ul>
	MCHIR001-Chirnside	60	<ul style="list-style-type: none"> <li>2019 Not Started</li> <li>No Planning Permission</li> <li>Low Market Demand</li> <li>Slow/Long Build Out Rate</li> <li>Access/Infrastructure</li> <li>Lower Dev. Density</li> <li>Unlikely to be started / completed by LDP 2021</li> </ul>
	EC2-Clovenfords	6	<ul style="list-style-type: none"> <li>2019 Not Started</li> <li>Land in Administration / Auction</li> <li>Flooding</li> <li>Unlikely to be started / completed by LDP 2021</li> </ul>
	EC6-Clovenfords	60	<ul style="list-style-type: none"> <li>2019 Not Started</li> <li>No Planning Permission</li> <li>Unlikely to be started / completed by LDP 2021</li> </ul>
	AEARL011-Earlston	120	<ul style="list-style-type: none"> <li>2019 Not Started</li> <li>Phase 1 requires to be built out first</li> <li>Access/landlocked in short term</li> <li>Landscaping / Flooding</li> <li>Unlikely to be started / completed by LDP 2021</li> </ul>

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	EGL17B/41/L32B/ GL200 - Galashiels	270	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• No Planning Permission</li> <li>• Land in Administration / Auction</li> <li>• Land locked (in part)</li> <li>• Low Market Demand</li> <li>• Access / Trunk Road</li> <li>• Topography / Engineering</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	AGATT007- Gattonside	40	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• Planning Permission (no action)</li> <li>• Sale Value Expectations</li> <li>• Flooding</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	EL16B-Lilleasleaf	7	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• Bought by Community Trust</li> <li>• Community Garden</li> <li>• No houses to be developed on land</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	EM32B-Melrose	230	<ul style="list-style-type: none"> <li>• Lower Density than specified</li> <li>• Topography / Access (in part)</li> </ul>
	ANEWT005-NSB	900	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• Land locked (in part)</li> <li>• Low Market Demand</li> <li>• Access / Infrastructure</li> <li>• Landscape</li> <li>• Topography / Engineering</li> <li>• School Provision</li> <li>• Will not be completed by LDP 2021</li> </ul>
	ASELK021-Selkirk	20	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• Potential Flooding Constraints</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
<b>Eastern HMA</b>	AAYT0003-Ayton	20	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• No Planning Permission</li> <li>• Low Market Demand</li> <li>• Phase 1 requires to be built out first</li> <li>• Access/landlocked in short term</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	Aeyem006-7- Eyemouth	132	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• No Planning Permission</li> <li>• Low Market Demand</li> <li>• Slow/Long Build Out Rate</li> <li>• Access/Infrastructure</li> <li>• Lower Dev. Density</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	BEY2B-Eyemouth	244	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• No Planning Permission</li> <li>• Low Market Demand</li> </ul>

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			<ul style="list-style-type: none"> <li>• Slow/Long Build Out Rate</li> <li>• Access/Infrastructure</li> <li>• Lower Dev. Density</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	MREST001-Reston	100	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• No Planning Permission</li> <li>• Slow/Long Build Out Rate</li> <li>• Access/Infrastructure</li> <li>• Contamination</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
<b>Northern HMA</b>	TE6B-Eddleston	30	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• Low Market Demand</li> <li>• Flooding</li> <li>• Topography/Landscape</li> <li>• Density</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	AEDDL002-Eddleston	35	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• Low Market Demand</li> <li>• Access</li> <li>• Topography/Landscape</li> <li>• Density</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
<b>Western HMA</b>	AWALK005-Walkerburn	100	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• Low Market Demand</li> <li>• Access</li> <li>• Topography/Landscape</li> <li>• Density</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
<b>Outside HMA</b>	BC04B-Cockburnspath	45	<ul style="list-style-type: none"> <li>• 2019 Not Started</li> <li>• Low Market Demand</li> <li>• Access</li> <li>• Density</li> <li>• Unlikely to be started / completed by LDP 2021</li> </ul>
	<b>LDP- Sub Total</b>	<b>2,439</b>	
	<b>TOTAL (SG+LDP)</b>	<b>3,194</b>	

As we have indicatively shown there are land allocations totalling a significant **3,194 homes**, that we would question in terms of being fully deliverable as part of any five year effective land supply or during the lifespan of the current LDP. Even if one were to take the approach that 50% of the above sites were delivered be it within the 5-10 year cycle that still results in **c.1,597 homes** not meeting the LDP's objective on housing delivery.



In short there are arguably a further 1,500 to 3,000 new allocations required in order to meet set targets given the constraints of existing allocated sites. An over reliance on windfall sites should not be advocated by the LDP2 but more modest and deliverable sites added to the housing supply.

To be clear we are not advocating in whole or part that the sites be removed but more an acknowledgment that there are more long-term opportunities that are unlikely to go towards providing an effective five-year land supply. Thus, there is a need to provide sites that can be delivered within a 5 year period.

**Proposed Allocations: Deliverability Concerns**

Moving forward to the LDP2 MIR and the approach in identifying new land for housing in the forthcoming LDP2. We again have some reservations regarding the approach taken in allocating certain sites and the lack of allocations within demand housing market areas and towns.

As noted previously we consider prior to producing the LDP2 Proposed Plan further review is required and in taking on board the outcome of SESplan2. In our opinion there needs to be an increase to compensate for the identified shortfall.

If that requires altering the total allocation within the Housing Market Areas then we consider that should be undertaken. Over identifying land in locations where there is not significant housing demand is counterproductive and only going to lead to housing targets not being met and pent up demand in areas where developers and people wish to live.

Within Table 3 below we note sites that again we would request be reviewed in greater detail in relation to their general location acceptability and overall deliverability in the short to medium term. Many of which are identified in areas where large allocations are yet to come forward and thus adding further allocations in these areas requires greater consideration.

**Table 3: MIR Proposed / Alternative - Site Constraints**

Market Area	Reference	Unit No.	Constraint
<b>Supplementary Guidance (MIR) Sites</b>			
Eastern / Berwickshire HMA	MDUNS005-Duns	100	<ul style="list-style-type: none"> <li>• Landlocked/Access</li> <li>• Flooding</li> <li>• Existing Undeveloped Allocations</li> </ul>
	ACOLD014-Coldstream	100	<ul style="list-style-type: none"> <li>• Landlocked/Access</li> <li>• Flooding</li> <li>• Existing Undeveloped Allocations</li> </ul>
Western / Tweeddale HMA	MESH1001-Eshiels	200	<ul style="list-style-type: none"> <li>• No settlement</li> <li>• Access</li> <li>• Infrastructure /sewerage</li> <li>• Landscape / Ecology Impact</li> <li>• Unlikely to be completed by LDP2</li> </ul>
	MESH1E002-Eshiels	50	<ul style="list-style-type: none"> <li>• No settlement</li> </ul>

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			<ul style="list-style-type: none"> <li>• Access</li> <li>• Infrastructure /sewerage</li> <li>• Landscape / Ecology Impact</li> <li>• Unlikely to be completed by LDP2</li> </ul>
	SCARD002-Cardrona	TBC	<ul style="list-style-type: none"> <li>• No settlement</li> <li>• Access</li> <li>• Infrastructure /sewerage</li> <li>• Landscape / Ecology Impact</li> <li>• Unlikely to be completed by LDP2</li> </ul>
	SPEEB008-Peebles	TBC	<ul style="list-style-type: none"> <li>• Landlocked / Access</li> <li>• Transport Impact</li> <li>• Landscape Impact</li> <li>• Infrastructure</li> <li>• Unlikely to be completed by LDP2</li> </ul>
	APEEB056-Peebles	150	<ul style="list-style-type: none"> <li>• Transport Impact</li> <li>• Landscape Impact</li> <li>• Infrastructure</li> <li>• Unlikely to be completed by LDP2</li> </ul>
	AEDDL008-Eddleston	40	<ul style="list-style-type: none"> <li>• Existing Undeveloped Allocations</li> <li>• Transport Impact</li> <li>• Landscape Impact</li> <li>• Infrastructure</li> <li>• Low Market Demand</li> <li>• Unlikely to be completed by LDP2</li> </ul>
	AEDDL009-Eddleston	35	<ul style="list-style-type: none"> <li>• Existing Undeveloped Allocations</li> <li>• Transport Impact</li> <li>• Landscape Impact</li> <li>• Infrastructure</li> <li>• Low Market Demand</li> <li>• Unlikely to be completed by LDP2</li> </ul>
	SEDDL001-Eddleston	TBC	<ul style="list-style-type: none"> <li>• Existing Undeveloped Allocations</li> <li>• Transport Impact</li> <li>• Landscape Impact</li> <li>• Infrastructure</li> <li>• Low Market Demand</li> <li>• Unlikely to be completed by LDP2</li> </ul>
	SPEEB009-Peebles	TBC	<ul style="list-style-type: none"> <li>• Transport Impact</li> <li>• Landscape/Environmental Impact</li> <li>• Flooding</li> <li>• Infrastructure</li> <li>• Unlikely to be completed by LDP2</li> </ul>
	<b>TOTAL</b>	<b>675+</b>	