



7<sup>th</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  
LAND SOUTH OF WAVERLEY ROAD, MELROSE**

Dear Sir/Madam

**Introduction**

We write on behalf of [REDACTED] and in relation to the above consultation. This representation relates to their site at Waverley Road, Melrose and is accompanied by the Call for Sites form and relevant site plan. The site has a potential capacity for approximately 40 dwellings and can help to assist the housing requirements within the next local development plan period. We can reveal that there has been strong demand shown for approximately 40 houses together with a potential care home for this site. We made representations for this site for the call for sites during the current local development plan period and proposed housing supplementary guidance period and await an outcome with regard to that.

**Site Details**

The site is located immediately to the west of the Melrose settlement boundary on land south of Waverley Road. It extends to approximately 4ha and is rough grassland. The site is on the edge of urban form and close to existing utilities and is within a highly sustainable location being located approx. 1mile from Tweedbank Train Station, next to High Cross Avenue bus stop and within 10mins walking distance of Melrose Town Centre. A variety of services are provided nearby including schools, shops and health centre.

**Opportunity**

The site represents a logical northern rounding off of the Melrose development boundary. The houses to the south of the site along High Cross Avenue would remain the closest built form to Darnick. The separation between the Darnick and Melrose development boundaries would remain with hedging along the site boundary providing a defensible boundary which would be enhanced and further fields between it and the nearest Darnick house.

The site is low lying and considerable distance from the River Tweed and Eildon hills. It is next to built form (which sits at a higher level) and would not significantly impact on these

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sensitive areas in terms of visual impact. Again the current and proposed hedging along the site boundary would lessen the visual impact.

We also note that there has been no housing allocated in this area of Melrose despite it being highly popular for new homes and will be evidently delivered over the lifespan of the local plan. It is important that land allocations are made in sustainable and sought after locations to live.

There are no potential constraints associated with the site and no contamination issues. There are no flooding concerns with the site. The site is on the edge of the urban settlement and therefore is in a sustainable location close to Tweedbank Train Station and regular bus services and also close to all existing utilities. The site will not have a major impact on the local road network and is highly accessible to Melrose Town Centre and thus assist in enhancing the use and vitality and viability of the town centre. The site actually represents a natural extension to Melrose and will no way lead to urban coalescence to Darnick given the existing fields that run between the settlements.

## Conclusion

We believe that this site should be allocated for 40 houses and a care home within the Local Development Plan 2021-2026 for the following reasons:

- it is deliverable in full within the Local Plan lifespan.
- It is not within an area of Flood Risk.
- It is in a sustainable location: Highly accessible to Melrose Town Centre, Bus services and Tweedbank Train Station.
- It is next to current built form and thus easy access to utilities/infrastructure and a natural low lying extension.
- It will in no way lead to urban coalescence with Darnick. A clear defensible boundary will be provided around the site and beyond this adequate greenfield spacing will remain.
- It will not have a significant visual impact due to its low lying nature and neighbouring built form sitting at a higher level.
- There is no allocation within this area of Melrose despite it being in high demand for new homes

We stress the importance of allocating housing in the Scottish Borders where there is a strong demand to live. There is clear high demand for homes in Melrose and thus kindly request that this site is allocated. 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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## 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>	



Proposed Housing  
Development at  
Breachfield, Melbourne  
N.T.S.