



Main Issues Report Response

Venlaw, Peebles

IAAB18-0062

Carmichael Homes

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1 INTRODUCTION

This report has been produced for Carmichael Homes in response to the Main Issues Report (MIR) issued by Scottish Borders Council (SBC) in 2018 as part of the review of the extant development plan. Carmichael previously submitted, through the call for sites in 2017, a proposal of residential development at Venlaw, Peebles for residential development on the basis of a lack of effective housing to deliver the 5 year housing land supply, the site was rejected by SBC. This report provides a renewed application addressing concerns that have been raised about Venlaw and mitigate these where possible.

The developer at Venlaw is Carmichael Homes who specialise in developing homes to meet the needs of modern living. Each project allows Carmichael to develop and ensure bespoke housing solutions are designed responding to the individual site context, local requirements and market demands. For each development there is a focus on creating attractive places and bright and modern living spaces.

As well as providing a renewed outline of the Venlaw proposal, the report will also seek to address two consultation questions within the SBC MIR.

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?

Question 9. Do you agree with the proposed existing housing allocations to be removed from the LDP? Are there any other sites you suggest should be deallocated?

This report will propose that the preferred options which have been put forth for inclusion in the Local Development Plan (LDP) are not effective and are too long term, leaving a gap in housing delivery between now and 2031. It is proposed that Venlaw can provide an effective site and address some of the anticipated housing shortfall. In the review of the MIR the housing targets and completions in SBC have been evaluated to consider the contribution development at Venlaw can make to housing delivery with reference to national, regional and local policy.

Having reviewed the sites which are proposed for deallocation it is also contested that further sites should be removed, a thorough review of all sites in the Peebles area has been conducted which has allowed effectiveness of sites to be highlighted through consideration against policy.

2 SITE DESCRIPTION AND BACKGROUND

The site at Venlaw is located to the north eastern edge of Peebles and extends to approximately 1.6 hectares in area. It is currently accessed through a field gate off the private single lane road leading to Venlaw Farm, the Venlaw Castle Hotel and seven private dwellings. Woodlands, a large residential dwelling, is located to the northern side of the private access road, Venlaw Farm to the northeast with Creag An Airdh to the east. Adjacent to the south east boundary the Steading, High Breeches and the Venlaw Castle Hotel are located directly within the eastern wooded boundary. Further east Hilltop and Smithfield Garden Cottage are located in close proximity, to the western edge the boundary is formed by the rear gardens to the existing properties along the A703.

The landscape contained within the site is generally open, rough grassland used historically for grazing, however, this land use has ceased with the landscape currently open grassland covering much of the site.

Tree cover within the open grassland is restricted to a small number of large mature trees to the centre of the site, increasing slightly towards the south and south eastern sections. Large blocks of relatively dense woodland surrounds the north, east and southern boundaries extending out into the surrounding landscape forming a wooded backdrop which provides a valuable landscape feature to the site and surrounding character. While offering strong boundary elements to the site this tree cover creates significant visual containment.

This report will make reference to a variety of previous submissions made for development at Venlaw throughout, it is important to note though that this is a renewed application and the site has been re-evaluated producing a new design response. The approach to the development is set out within this consultation response and supporting plans. The history has been considered in detail and this renewed proposal has evolved from previous submissions in light of the detailed feedback. The history does highlight the developer's aspiration to develop the site and provide Peebles with attractive and innovative housing units. As part of this response a full and comprehensive review of the historical planning applications has been undertaken to ensure an effective response to all previous feedback is presented which addresses all previous responses and ensures mitigation is provided where possible. It is our opinion that the proposal is significantly improved from previous submissions.

3 PROPOSED DEVELOPMENT

The Carmichael Homes development provides Peebles with the opportunity for "attractive, well designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places." The development is therefore aligned with SPP and will allow one of the policy principles to be realised with this development. The proposal is for 22 homes that will be organised in a single row and limited to the lowest portion of the site. Enclosed with the MIR Response we have provided:

- Site layout and landscape plan
- Site sections
- House type floor plans
- Visualisations

4 POLICY CONTEXT

4.1 National Planning Context

The purpose of the Scottish Planning Policy (SPP) is to set out national policies which reflect Scottish Ministers' priorities for the planning system. The SPP promotes consistency in the application of policy across Scotland whilst allowing local authorities sufficient flexibility to reflect local circumstances. The Town and Country Planning (Scotland) 1997 Act requires planning applications to be determined in accordance with development plans unless material considerations indicate otherwise. As a statement of Ministers' priorities, the content of the SPP is a material consideration that carries significant weight in any planning application, though it is for the decision-maker to determine the appropriate weight in each case. According to SPP, where development plans and proposals accord with national policy, their progress through the planning system should be smoother.

An important function of the planning system in Scotland is the delivery of houses, SPP outlines the national policy on the requirement of planning to enable the delivery of new homes. This policy states that-

"The planning system should

- *identify a generous supply of land for each housing market area within the plan area to support the achievement of the housing land requirement across all tenures, maintaining at least a 5-year supply of effective housing land at all times;*
- *enable provision of a range of attractive, well-designed, energy efficient, good quality housing, contributing to the creation of successful and sustainable places; and*

- *have a sharp focus on the delivery of allocated sites embedded in action programmes, informed by strong engagement with stakeholders” (SPP, para 110).*

SPP also states that, “plans should be informed by a robust housing need and demand assessment (HNDA), prepared in line with the Scottish Government’s HNDA Guidance. This assessment provides part of the evidence base to inform both local housing strategies and development plans (including the main issues report). It should produce results both at the level of the functional housing market area and at local authority level, and cover all tenures” (SPP, para 113). HNDAs are designed to give broad, long-run estimates of what future housing need might be, they provide an evidence-base to inform housing policy decisions in LDPs.

Scottish Borders is located within the SESplan area where the HNDA is undertaken at a regional level with Housing Supply Targets for individual local authorities set by the Strategic Development Plan (SDP). The HNDA for the SESplan area was certified as robust and credible in 2014 and the targets established were subsequently utilised in the regional planning process where the six local authorities in the SESplan area collaboratively produced the proposed SDP.

SPP provides definitions relative to housing land supply targets and housing land requirements that are important to understand in evaluating the land supply.

- “The **housing supply target** is a policy view of the number of homes the authority has agreed will be delivered in each housing market area over the periods of the development plan” (SPP, para 115)
- “The housing supply target should be increased by a margin of 10 to 20% to establish the **housing land requirement**” (SPP, para 116)

A housing supply target and housing land requirement must be set for each local authority area and each functional housing market area. For SBC this target is identified within the approved SESplan which then applies a 10% margin of generosity to establish the land requirement. As previously noted, SPP requires a margin of 10-20% generosity to be applied to establish the housing land requirement, by only applying 10% SBC have applied the minimum generosity.

SPP requires the LDP to then “allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the strategic development plan up to year 10 from the expected year of adoption. They should provide for a minimum of 5 years effective land supply at all times. In allocating sites, planning authorities should be confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met” (SPP, para 119).

Housing Land Audits (HLA) are prepared to enable local authorities to understand if the targets set by SPP have been and can continue to be achieved. The two key functions of the HLA according to PAN 2/2010 – Affordable Housing and Housing Land Audits are-

1. To demonstrate the availability of sufficient effective land to meet the requirement for a continuous five year supply; and
2. To provide a snapshot of the amount of land available for the construction of housing at any particular time

PAN 2/2010 provides guidance on the preparation of HLAs stating, "the effectiveness of individual sites should be determined by planning authorities in the light of consistent interpretation of the following criteria and through discussions with housing providers. The aim is to achieve a realistic picture of the available effective land supply which can contribute to the housing requirement so that the level of additional housing, and therefore land needed to meet the overall requirement, can be established" (PAN 2/2010, para 55).

Local authorities are therefore required to apply criteria in its assessment of sites, key to this is the consistent approach which must be taken to ensure all sites are fairly and impartially considered. To determine the likelihood of a site coming forward, a local authority should refer to the following criteria for establishing the effectiveness of sites-

- Ownership
- Physical
- Contamination
- Deficit Funding
- Marketability
- Infrastructure
- Land Use

Through application of these, local authorities should be able to build a picture of the effective land available in their area and ultimately determine what sites should be allocated in the LDP. Further advice is also available through the Homes for Scotland procedure document on HLAs. Local authorities should also work in collaboration with Homes for Scotland who help to ensure transparency and impartiality in the site selection process through their audits of LPAs where they will challenge sites which do not appear effective.

4.2 Regional Planning Context- SESplan2

SBC sits within the SESplan area and is therefore subject to this city region plan. SESplan2 outlines the growth plan for the Scottish Borders for 2018-2030 and states that all Strategic Growth should be directed towards three Strategic Growth areas, the locations are identified on Figure 3.5 of the Proposed SESplan – as shown in Figure 1. These areas will be the focus for retail, commercial and strategic employment opportunities and development should be directed towards these areas. Peebles sits within the Western Borders area and will play a significant role in the growth between 2018 and 2030 as the biggest town in that area.

It is important to note that the Strategic Growth 2018 – 2030 is to broadly take place within the locations highlighted in Figure 1. The surrounding areas marked by light dots are identified for Rural Growth beyond 2030. The housing allocations and strategy for development within the LDP requires to be consistent with this.

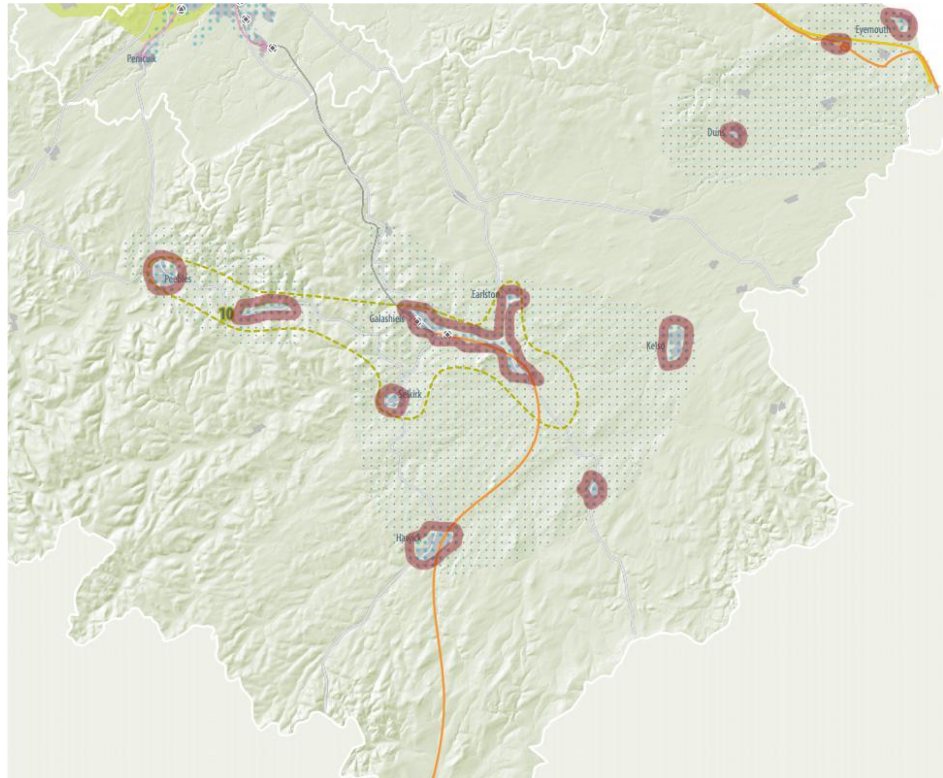


Figure 1: SESPlan2 Strategic Growth Areas

SESplan2 sets out ambitious targets for housing delivery across 2018-2030, these are outlined in Table 1. Table 2 then outlines the housing land that is required based on the housing supply targets.

Table 1: SESPlan2 Housing Supply Targets 2018-2030		
Area	Number of Homes Annual Average	Number of Homes Period Total
City of Edinburgh	2,420	29,040
East Lothian	519	6,228
Fife	867	4,176
Midlothian	534	6,408
Scottish Borders	348	4,176
West Lothian	633	7,596
SESPlan2 Totals	5,321	63,852

Table 2: SESPlan2 Housing Land Requirements 2018-2030		
Area	Number of Homes Annual Average	Number of Homes Period Total
City of Edinburgh	2,662	31,944
East Lothian	571	6,851
Fife	954	11,444
Midlothian	587	7,049
Scottish Borders	383	4,594
West Lothian	696	8,356
SESPlan2 Totals	5,853	70,237

These targets subsequently form part of the Development Plan for each local authority, in the case of Venlaw this would be in SBCs target for 348 homes to be built per annum and in terms of effective land supply there is a requirement for 383 units per annum to meet the delivery target. The City of Edinburgh is at the centre of the region and has significant influence on the surrounding areas. The HNDA identified that 11% of the sales in Scottish Borders were to purchasers from Edinburgh, placing pressure on house prices. This effect is greater on the radial routes, Peebles and Lauder are affected most from this as shown in Figure 2.

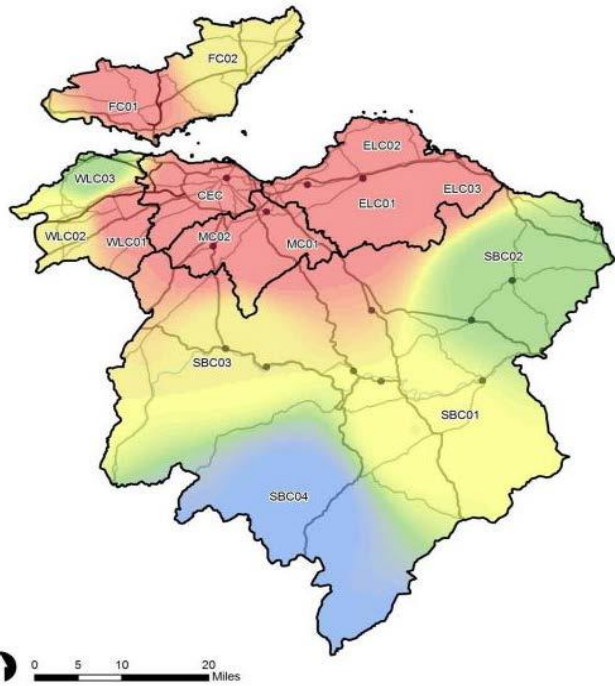


Figure 2: HNDA Edinburgh's Mobile Demand

Berwickshire is much less influenced by sales from Edinburgh.

SESplan2 further states, "A step change in the level of home building is needed for the Housing Supply Targets to be achieved. SESplan member authorities will monitor the availability of effective housing land in relation to the SESplan Housing Market Area and by the Local Authority Area" (SESplan2, 5.11). This recognition of the change needed to achieve the ambitious targets leads to local authorities having to adopt a renewed approach to allocation of sites, previous trends highlight that historic methods have consistently not delivered enough units. Developers are operating through a period of great uncertainty with political unrest and a very challenging economy, local authorities must recognise this and make novel approaches to facilitate development and deliver the housing numbers that Scotland needs.

SPP states that sites allocated within a LDP should be "effective or expected to become effective in the plan period to meet the housing land requirement in full. They should provide a minimum of 5 years effective land supply at all times" (SPP, para 119). Crucial to this is the effectiveness of the sites which have been allocated, there needs to be a realistic chance of development or the local authority should deallocate the site.

SESplan2 states, "SESplan member authorities will also consider deallocating sites carried over from multiple plan cycles where action taken has proved ineffective in making them deliverable over a number of plan periods" (SESplan2, 5.11). Thus, members of the SESplan area should not dwell on sites which are unlikely to deliver housing for the region, particularly now that regional

policy requires development to be contained in the Strategic Growth areas outlined by SESplan2.

The MIR identified 4 sites for removal from the LDP on the basis that they are not effective. Collectively, these sites have an indicative capacity of 95 units which equates to 2.7% of the total effective housing supply in the Borders. This figure is very low when considered against the fact that SBC have only achieved their target of completions once in the previous five years. The HLA states that there is an established land supply of 8,586 in SBC with 15% of this being in the Northern area within which Peebles sits. The average completion rate for the five years preceding the audit was 297 houses per annum against an average allocation of 8,794 units, this indicates a total of 3.3% of the established supply is completed annually. Based on that completion rate, the completions based on the land supply for 16/17 will be 283, this is significantly less than the 348 required and clearly illustrates the need for a change in the development strategy and increase in the effectiveness of sites.

A review of allocated sites in Peebles along with the LDP area was undertaken to review effectiveness and likelihood of development occurring and achieving the housing supply targets. Whilst some sites have progressed and appear effective, there are sites which should be determined as ineffective and removed from the supply or alternatives identified. The MIR states that, "If any sites have been allocated within the LDP for a significant period of time with no development interest from either the land owner or the development industry then the sites should be considered for removal" (MIR 2018, 5.11). This position is echoed by the proposed SESplan2.

The SESplan region produced a Housing Background Paper in 2016 which set out the background, process and justifications for the housing targets outlined in the SDP. It states that in order to achieve the additional dwellings target outlined by the plan, a record average increase in completions will be necessary. The likelihood of this rate of delivery is questionable at best without major change to the delivery strategy. Previous records were achieved in times of far greater economic vibrancy and certainty, thus, a change in strategy is required by SBC to deliver their target. If they do not adapt then they run the risk of being under pressure for placing citizens in housing poverty.

4.3 Housing Land Supply and Delivery

Background

SPP requires LPAs to complete annual HLAs as a tool to critically review and monitor the availability of effective housing land. The purpose of completing a HLA according to SPP is to identify and monitor the established and effective housing land supply, to meet the requirement for monitoring housing land.

SBC published its most recent HLA in April 2018, Homes for Scotland note that audits should provide details of planning consent status, however, this has not been provided in the Borders HLA leading to a degree of uncertainty regarding the effectiveness of sites. The audit provides data on a number of factors involved in the supply of housing in the Borders allowing reasonable conclusions to be drawn on the effective housing supply in SBC. Table 3 below sets out the rates of completion in SBC over the last five years.

Table 3: Historical Completion in SBC 2012/13-2016/17							
AUDIT PERIOD	2012/13	2013/14	2014/15	2015/16	2016/17	TOTAL	AVERAGE COMPLETION
Completions	306	288	272	373	250	1,489	297.8 per annum
Source: Housing Land Audit 2017							

As noted in table 3, the average completion rate per annum in SBC is 297.8, this figure is concerning when considered against targets outlined in SESplan2 which require SBC to complete 348 houses per annum. At the current rate, this would not be achieved and would provide a shortfall of 50 houses per annum. Further, had this target been in place over the previous 5 years, then it would only have been achieved once in 2015/16. Again it is illustrated the need for a change in strategy by SBC, the HNDA established the housing need for the region in 2014 for the next 20 years and SBC runs the risk of failing to meet this need if it applies previous strategies which has proved ineffective.

Evaluation of Effective Land Supply

It is considered that there is likely to be a combination of development constraints in certain locations of the Borders given their remote location which may result in challenges with marketability. Looking at house price data identifies that there has been increases in house prices over this period from £163,978 in 2012 to £181,258 in 2017. There has also been a continued growth in the volume of house sales since 2012. House prices for Peebles are also higher than the average figures reported for Scottish Borders as a whole. The MIR notes that there is limited market interest in Innerleithen and Walkerburn and in order to achieve the

housing targets there requires to be land allocated that is both marketable and can become effective during the plan period.

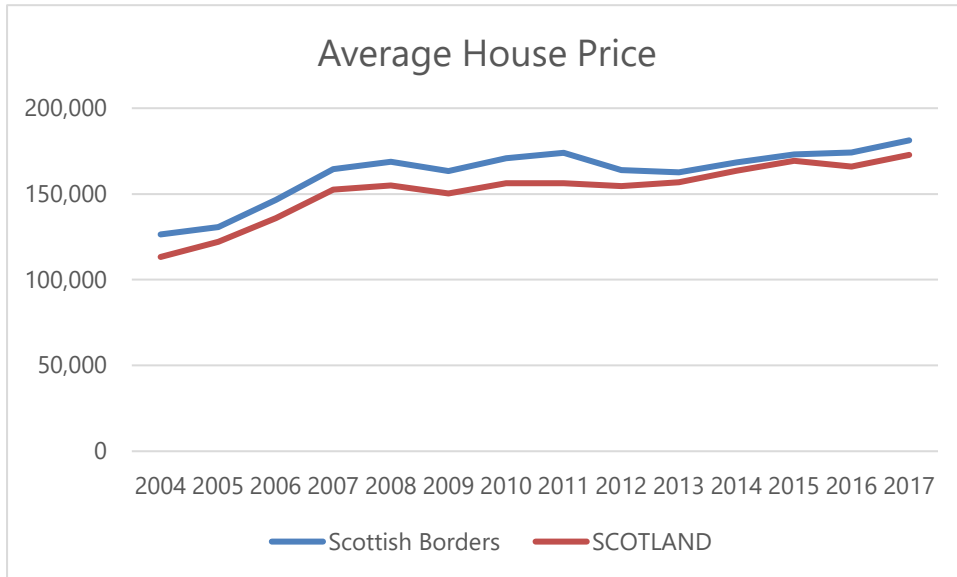


Figure 3: ROS Average House Price Data

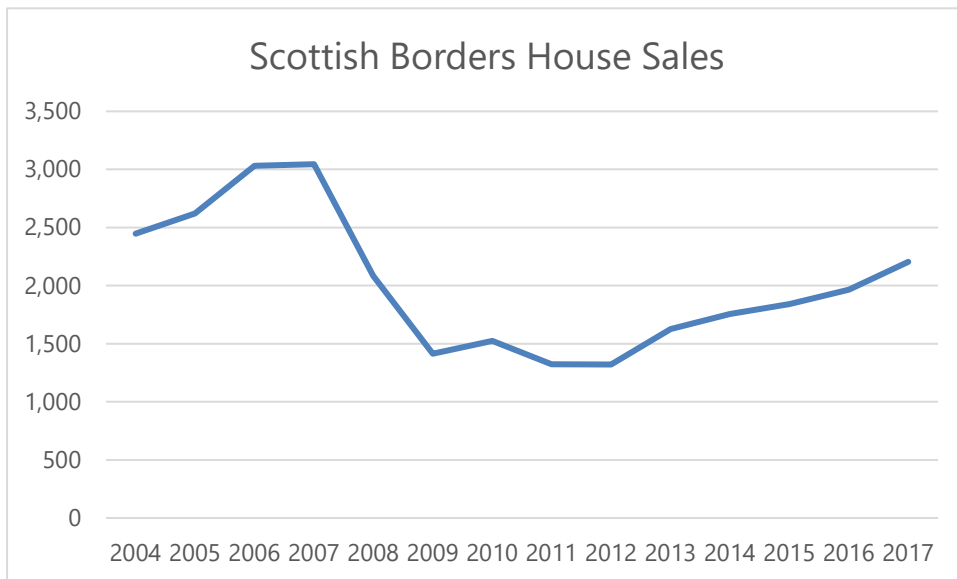


Figure 4: ROS House Sales Data

As a background document to the MIR a Housing Technical Note has been produced by SBC. This note identifies that data from the HLA and Supplementary Guidance (SG) and identifies an available land supply. This land supply has been calculated by taking a sum of the effective land available, the potentially effective land, the constrained land, windfall development, SG sites and subtracts any demolitions and completions anticipated for the period up to 2018. The technical note identifies a total land supply of 9,554 units available. It also suggests that the MIR Sites would further add a supply of 668 units.

SBC are required to allocate a range of sites which are effective or expected to become effective in the plan period to meet the housing land requirement of the SDP up to year 10 from the expected year of adoption. The need for this to be properly planned is highlighted in the recent judgement from *Grahams the Family Dairy Limited and MacTaggart & Mickel Homes Limited against Scottish Ministers* where the lack of a 5 year land supply emerging through a LDP is a material consideration. It is therefore necessary that the land supply emerging will be effective and deliver the regional strategy. There are a number of comments that we would make on the assumptions for the effective land supply in SBC.

1. The allowance for windfall sites should be excluded from the consideration of effective land supply.
2. The land currently identified in the HLA as constrained should not be considered to contribute towards the effective supply as at this point in time it is not expected to become effective.
3. The land supply identified in the Technical note is across the entire Borders area, which is not consistent with the SDP Strategy.
4. Land supply is based on an assumption that all sites will be completed within the period rather than considering the programming of larger allocations and the likely contribution towards the effective 5 year land supply.
5. SG sites are not all in addition to the effective land supply and there has not been a review of the effectiveness of these sites undertaken.
6. There is an estimate of completions for the 4 years up to the predicted date of adoption. The Housing Technical Note estimates that there will be 1,246 units completed per annum over this period, however, the housing supply target is 348, this would represent an undersupply of 146 units.

Set out in Appendix 1.1 to 1.5 is an assessment of the existing and proposed land allocations and an application of programming for these to determine the effective land supply for the next plan period, the assessment is explained within the following sections. It is considered that the allocations do not provide sufficient effective land to meet the housing delivery targets up to 2030/2031.

Supplementary Guidance Sites

In 2017, SBC were required to publish SG to address a housing shortfall of 811 units which was highlighted at the examination of the LDP. The SG identified the necessary sites to fulfil the shortfall, in Peebles two sites were established to deliver 100 units in the town, MPEEB006 Rosetta Road and MPEEB007 March Street Mills.

Application has been made at March Street Mills for development and it has been recommended by SBC planners for approval. Due to the number of objections the decision was to be heard at committee, however, following an appeal by the developer to Scottish Ministers for non-determination of application, it will now be decided by a Reporter. Similar to other developments in the town, the viability of this development appears to be questionable, the developers have made an application to be exempt from having to pay education contributions and without this and development appears unlikely to proceed. It has been assumed that this development will proceed in the figures.

The site at MPEEB006 is not new, rather it appears to be a site which has been reallocated. Permission in principle was sought in 2013 for this site to for mixed use development of new housing, relocation of caravan park, erection of facilities building and sales office. The development appeared to be successfully progressing until SBC sought to enter into a s75 agreement with the developer, the contributions which were required to allow development meant that the developer would encounter a £1 million loss on the development. Naturally interest has quelled and no correspondence on this application has been noted since April 2017.

The SG was produced to rectify a significant shortfall in the effective housing land supply in SBC, the two sites outlined above for Peebles are part of the solution. Having considered the sites there are questions around their effectiveness and likelihood of coming forward. MPEEB006 appears unlikely to come forward, the site will require developer contributions and this previously halted the project.

Appendix 1.1 sets out a review of each of the sites within the SG and identifies the effective units. Where considered to be effective these have been included within the overall assessment for delivery.

Windfall Sites

PAN 2/2010 states that "Windfall sites arise unexpectedly and are by definition not part of the planned housing supply. These are opportunities for new housing involving the reuse or redevelopment of previously developed sites, i.e. brownfield sites which were not included within the development plan and are not counted towards meeting the housing land requirement. They might be included as part of the established supply in the audit as a result of an urban capacity study where the site is considered to have potential for housing development. These sites should count towards meeting the housing land requirement only once planning permission has been granted for residential development and it is considered to be effective or is being developed" (PAN 2/2010, para 62). SBC have applied a fairly consistent

figure of windfall to its projections, however, the inclusion of these sites in their figures in calculating the effective land supply is not in accordance with PAN 2/2010.

Contribution of Small Sites

Small sites can play an important role in meeting the housing land requirements, an assessment of small sites contribution is set out within the SBC HLA in Appendix 3. The method of calculating the completions on small sites is not clear as Appendix 3 lists only 7 completions on small sites during 16/17. Within the Strategic Growth locations this figure is only 2. Based on this there should not be any additional consideration to small sites in identifying the established land supply.

Main Issues Report Proposals

In 2017 SBC completed a call for sites as part of the development plan scheme, this gave developers an opportunity to put forth sites for inclusion in the new LDP.

Venlaw was submitted as part of the call for sites, however, it was determined to be excluded by SBC. Rather, three sites were included as preferred in Peebles-

- SPEEB008 Land West of Edderston Ridge
- APEEB056 Land South of Chapelhill Farm
- SPEEB009 East of Cademuir

Two further sites were also included which sit just outside Peebles but in close proximity within the Tweedale locality. It is worth noting that these are not located within the Strategic Growth area and do not fit with the strategy for housing during the period 2018 - 2030. Whilst not connected to Peebles these are considered to be a less sustainable development option. For the purpose of the assessment it is assumed that they do form part of the effective land supply for Peebles.

- MESH1001 Land at Eshiels I
- MESH1002 Land at Eshiels II

In 2018 SBC commissioned Land Use Consultants (LUC) to conduct a development options study and subsequently produce a report titled Western Rural Growth Area: Development Options Study. The report had numerous objectives, however, one crucial objective relevant to the LDP was to identify potential development areas for the short and long term in SBC, to inform future identification of development allocations. The report recommended a total of nine sites in the Western Rural Growth Area with three of these located in Peebles.

All sites which have been determined as preferred and alternative in Peebles appear to have been as a result of the LUC report. It does not appear that any sites have been successfully

submitted for inclusion aside from the three recognised areas in the report. Ten other submissions have been made through the call for sites and they have all been considered to be excluded for a variety of reasons. **Review of Existing Land Supply**

In considering the supply we have undertaken a review of the deliverability of the allocations within the other settlements, but it should be noted that of this supply there are allocations that have been in the audit in excess of 10 years with no progress towards delivery. This review has been undertaken in accordance with PAN 2/2010 and guidance prepared by Homes for Scotland. This results in a loss of 395 units from the effective land supply in SBC.

Assessment of Overall Housing Supply Target

In assessing the overall housing supply target we have utilised the existing programming for the settlements within the Strategic Growth locations with amendments made to this in accordance with the review of SG sites, new allocations and the existing effective land supply. The programming for each of the Strategic Growth locations is set out in Appendix 1.4.

Overall for the LDP period, the housing supply target for SBC is set at 348 units per annum to be located within the Strategic Growth locations. The LDP is required to plan for the period to 2031 and there is also need to consider planning for any shortfall in delivery between 2015 and adoption of the new plan. For the period 2015 to 2031 there is a housing delivery target of 5,916 homes. We have undertaken to set out programming for new allocations and added these to the housing land audit figures and taken account of the detailed consideration for allocations in Peebles, see Appendix 1.2. Based on this analysis, it would indicate that the land available and proposed within the Strategic Growth locations will provide an effective land to deliver 5,296 homes; a shortfall of 620 units. A summary of this information is included at Appendix 1.5. It is advised that SBC undertake an extensive review of allocated land to determine effectiveness and where appropriate remove allocations to direct resources and investment to locations that can meet housing need and demand.

4.4 Allocation Strategy

Greenfield Allocations

Recognition of the need to consider increasing allocation of greenfield land by local authorities is occurring throughout Scotland as authorities collectively seek different approaches to address the housing shortfall. For example, Aberdeenshire has allocated more housing land to greenfield sites in response to the housing market. SBC appears to be somewhat behind the curve in regards this approach, for instance, Aberdeenshire have allocated 92% of their established land supply to greenfield, whereas, SBC have only allocated 82%. Peebles lies within the Northern Housing Market in SBC and allocations for greenfield in this area are only 65%. Whilst it is not proposed that an exact comparison can be made, there are significant similarities between land in the Borders and Aberdeenshire with both being rural authorities influenced by

a city economy. Therefore, a variance of 17% in the allocation of greenfield sites would indicate an opportunity for SBC to follow novel approaches in other rural local authorities who seek to facilitate development and meet housing demand.

Whilst it is recognised that national policy in SPP favours development on brownfield sites, however, it is noted in various housing policy documents that a refreshed approach is required to encourage development and allow realisation of the ambitious targets set by the regional planning strategy. SBC appears to consider their figure of 82% on the higher side, they justify it stating that the high figure is caused by the rural character of the Scottish Borders and the relatively tight boundaries of the settlements. It would be fair to conclude, through comparison with other rural areas, that the Borders figure is in fact not high. This may be another contributor to the consistent failure to deliver the targeted housing numbers in SBC with an over reliance on brownfield sites which are, in many cases, not effective or in locations where there is not an established demand.

Benefit of Peebles in Delivering Development Strategy

The SDP requires that Strategic Growth be directed towards the main settlements in the next plan period. Programming for Peebles has been reviewed to understand the outlook and attempt to forecast annual completion rates in the town up until 2031, the outlook is suggested to be lower than what is required for a town which is going to play a vital role in the future growth of SBC. Given the location of Peebles within an area in demand from Edinburgh buyers, a lack of housing delivery in this location will increase pressure on affordability within the town.

Peebles is an ideal location for this growth as it is seen as one of the more marketable towns in the Borders by developers who can capitalise on higher house prices. The HNDA for SESplan area highlights this buoyant market, house prices for SBC have consistently been 10% higher than the Scottish average since the turn of the century. During times of great economic challenge, developers wish to operate in the most reliable markets to ensure a healthy return on any investment, it appears Peebles and the Borders can provide this. In order to fulfil the regional vision it is essential for the LDP to allocate the necessary land in the Strategic Growth locations including Peebles, this will aid delivery of housing targets in SESplan2 city region.

Having reviewed the allocations in Peebles between 2019 and 2031, detailed in Appendix 2, this report suggests that across this period there will be a shortfall in the required level of housing which will subsequently impact the city region. Table 5 below outlines the forecasts which have been derived from applying the following reasonable assumptions to future housing delivery on effective sites:

- Figures in HLA taken up to 2024 and reasonable assumptions applied from 2025 onwards

- Allocation from Esheisls included in figures (despite being outwith Strategic Growth location)
- Longer term sites identified in MIR have no completion until 2030
- All proposed sites in MIR included

Table 5: Peebles forecast completions

Year	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	Total
Units	26	42	50	29	39	40	40	35	35	30	30	45	55	504

Source: Figures Calculated in Accordance with Appendix 1.2

Consideration of Appropriate Development Strategy

Evaluating past completions can provide evidence to consider the appropriateness of a development strategy, particularly in terms of deliverability. Looking at completions by housing market area and forecast completions within the Strategic Growth settlements shows that the Central Borders area has delivered the highest rates of development. Within the strategy there is a more significant focus on this area with major allocations. There is a reduction in the housing delivery in the Northern area despite the demand identified by the HNDA for this location. Table 6 sets out the historic housing completions for the Strategic Growth locations. The majority of development interest is focussed on Central Borders, but with the exception of affordable housing developments, rates of completions in the other settlements have been very low. Given past trends of below target housing completions, reducing supply in the Northern area will severely compromise delivery and it is considered that there should be a greater focus on development in Peebles to meet housing targets.

Table 6: Completions in Main Strategic Settlements

	2013	2014	2015	2016	2017
Darnick	0	0	0	1	5
Duns	4	1	1	30	2
Earlston	1	3	0	2	0
Eildon	1	0	0	0	0
Eyemouth	1	0	3	32	0
Galashiels	56	64	30	74	58
Gattonside	1	1	3	0	1
Hawick	14	14	4	17	38
Innerliethen	2	27	3	1	12
Jedburgh	0	1	5	0	2
Kelso	20	11	36	19	24
Melrose	9	8	10	15	4
Netown St Boswells	8	0	1	0	0
St Boswells	1	1	0	0	1
Peebles	57	33	47	74	17
Reston	1	0	0	0	0
Selkirk	2	4	3	3	1
Walkerburn	0	2	0	0	0
Source: Scottish Borders Housing Land Audit					

This report highlights concern at the forecast rate of delivery between 2024 and 2029, this six year period clearly stands out as having low completion rates. Whilst the entirety of the SBC housing delivery does not rest on Peebles, its allocation as a Strategic Growth area by SESplan2 suggests a requirement of SBC to ensure appropriate allocation is made to deliver housing. The allocation in Peebles is also pro rata lesser than some of the other towns also classed as Strategic Growth areas, when the expected unit growth is assessed against the current population the following growth figures can be determined-

- Kelso 16%
- Earlston 12.7%
- Innerleithen 11.4%
- Peebles 6.8%

Whilst it is recognised the other towns may be attractive due to availability of land, they are not as marketable as Peebles and will not deliver the housing units which could be delivered there.

4.5 Summary

The report has highlighted a number of arguments why it believes the housing figures in SBC are flawed and will not deliver the targets set by SESplan2, these will now be summarised.

Peebles has been designated for Strategic Growth by SESplan2 (2018-2030) indicating its importance to deliver housing in the Borders, coupled with this is its prominence in the Northern Borders area where it is the most populous town. Market conditions in the town are noted by developers as being stronger than many other in the region giving further basis for development in Peebles.

SESplan2 highlights the need for a different approach to the allocation of housing in its local authorities, this is particularly relevant in the SBC where the delivery has been below the housing supply target. This will be vital for the authority to address to ensure a planned solution to housing delivery and not risk land releases by appeal.

SESplan2 has outlined challenging targets for its authorities to deliver, SBC have a target of 348 units per annum, however, this figure has only been achieved once in the previous five years. Ambitious targets combined with poor housing allocations which have continually failed to deliver for the region and nation are very concerning.

The process of developing a new LDP should provide local authorities with a chance to remove dead wood from its housing allocations through deallocation of sites. SESplan2 encourages its authorities to do so highlighting the need to achieve long term growth opportunities. As previously noted, SESplan2 designates Peebles as a Strategic Growth area and as such forms a long term regional strategy for the Edinburgh city region. SBC have deallocated four sites with a total capacity of 95 units, given the previous completion rates in the city, coupled with the dilution of these by windfall and small sites, it would be fair to argue for a higher level of deallocation with effective sites put forward to rectify the shortfall. It would be reasonable to suggest that many allocations made in previous development plans have not progressed and effective sites should be identified to meet housing supply targets.

SBC have included four new sites for Peebles and developments south of the Tweed are identified as long term and subject to future infrastructure investment, this constrains the effective land supply in Peebles.

It is put forth that SBC's approach in theory has been demonstrated as providing sufficient land, once adopted though, the sites available will not ensure a 5 year effective land supply through the plan period leading to a shortfall of housing. Venlaw provides an effective opportunity to contribute towards this shortfall in a location that is in need of additional housing allocations to meet demand.

5 MAIN ISSUES REPORT CONSULTATION QUESTIONS

In addition to the Venlaw development, the report has considered a number of other points and identified a number of potential issues in the MIR which will ultimately limit housing development in the Borders. Peebles is extremely attractive to developers due to its marketability, this has not been recognised in the report as a lack of effective allocation. There appears to be a clear focus on the south side of the River Tweed, however, it seems the bridge requirement is likely to provide an immovable barrier for some time though. Rather than adapt SBC have stagnated and are relying on ineffective sites, this is not consistent with policy which urges local authorities to try something new in their efforts to deliver housing. Added to this is the over reliance of SBC on windfall and small sites, these have a part to play but have been over stated in the Borders further impacting the forecasts. Finally, it is interesting that no sites which are being put forward for Peebles have been submitted by the public, all four sites were recommended by LUC. Below there are responses to questions 7 and 9 of the MIR.

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?

The MIR highlighted three sites for Peebles as preferred options as indicated in figure 5; SPEEB008, SPEEB009 and APEEB0056.

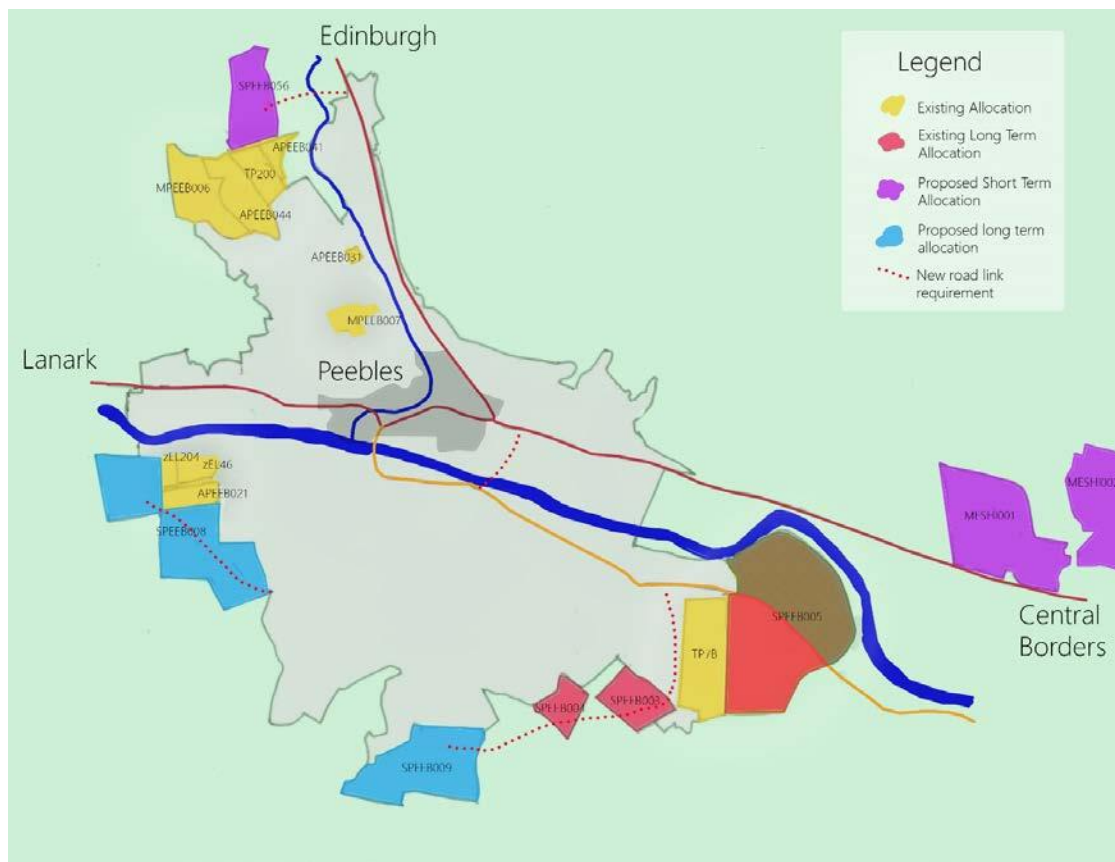


Figure 5: Peebles Allocations and MIR Proposals

SPEEB008 and SPEEB009 do not provide an indicative capacity, however, are of a scale which indicate that development will be significant for Peebles. Both sites lie on the south side of the River Tweed and therefore will have significant impact on traffic in Peebles and require the building of a new bridge to address the subsequent increased capacity of the road network. As well as these developments, a further seven have been previously allocated and are proposed to remain in the LDP which all lie south of the river. Cumulatively these developments will have a profound impact on the traffic crossing the river and ultimately not be sustainable for the town of Peebles without significant infrastructure investment.

Further allocation is made at APEEB056, this report welcomes this site and feels it is a good allocation for Peebles. One concern though is the proposed housing numbers, it is considered that this development will be highly dense should it proceed with a capacity of 150 that would not be in keeping with the surrounding area. The density proposed is 21 units per hectare, LUC stated that their brief from SBC was to locate sites for the upcoming development plan with a density of 30 dwellings per hectare, across a developable area typically 70% of a site. As a comparison the most recent development at Violet Bank included 40 units on a site of 2.6ha, a density of 15 per hectare, which is more appropriate in this context.

There are no proposed alternative options for Peebles and as such this report provides no comment on this. An alternative option proposed by this report is a residential development at Venlaw. The approach to this submission has been to appoint a new design team and reassess the development proposals in light of feedback which previously was not sufficiently considered. The new proposal of 22 units on the lower side of the Venlaw slopes mitigates the concerns raised previously and within the LUC report.

In summary, it is contended that developments to the south of the Tweed of SPEEB008 and SPEEB009 have challenges which cannot be foreseen to be overcome in this plan period. This will ultimately render them ineffective and lead to a failure to deliver the targeted housing numbers in SBC.

The inclusion of Venlaw does not provide capacity to solve all problems in SBC, however, provides an effective site which could be brought forward quickly and assist in delivery of the strategy. Section 6 of this report details how the revised proposal responds to the concerns raised regarding the development.

Question 9. Do you agree with the proposed existing housing allocations to be removed from the LDP? Are there any other sites you suggest should be deallocated?

The MIR proposes four sites be deallocated from the LDP, this report is in favour of these, however, having completed a review of the effectiveness of existing allocations, it is proposed

that there is a requirement to consider in greater detail the effectiveness of existing allocations and take steps to deallocate if there is no realistic prospect of development proceeding.

Within Peebles it is proposed that there are two existing allocations which should be considered ineffective. The first site is APEEB031 George Place, this site has a capacity of 36 units and previously operated as a mechanics garage. The site was added to the HLA in 2006, however, no development has commenced in the thirteen years since, the HLA estimates development will begin in 2021 with completion by 2023. The site still does not have planning permission having been refused in 2006 with no application since. The developer is listed as Techauto Ltd, this is the name of the owner who operated on the site previously, and there is no mention of a developer to bring the site forward. This is a brownfield site that can come forward despite allocation, but this should not be relied upon for meeting housing targets.

Full planning permission was refused due to the risk of flooding, however, outline planning permission was granted for the erection of 36 flats subject to conditions and s75 agreement in May 2005, this agreement has never been reached. During this application, SEPA continued to object to the development on the grounds of flood risk, despite a flood risk assessment being carried out, noting that the assessment did not address their concerns.

Homes for Scotland recommends in their HLA procedure note that any site which has appeared in the HLA for twelve years without significant recent progress is ineffective and should be re-considered when the LDP is reviewed. This site was included in the HLA in 2006 and has made no real progress since and therefore should be removed from the LDP. PAN 2/2010 states, "To assess a site or a portion of a site as being effective, it must be demonstrated that within the five-year period beyond the date of the audit the site can be developed for housing" (PAN 2/2010, para55). It appears that this is not the case here further adding to the argument for its removal from the effective supply.

Recommendation should be made for this site to be removed from the upcoming LDP as having been added in 2006 no consent has been granted, developer obligations appear to have been this sites undoing and today there is no developer in place. Homes for Scotland, in their procedure note, only recognise sites that are owned or controlled by a developer, giving further argument for its removal.

The second site which should be classed as ineffective is APEEB044 & MPEEB006 Rosetta Road. This site has a capacity of 100 units and was added to the HLA in 2016 which estimates units being delivered from 2021 at a rate of 20 per annum. Planning permission in principle was applied for in 2013 for mixed use development on site, this application is still pending decision as there appears to be a viability issue preventing agreement on development obligations. The site currently operates as a caravan park, it appears that development would see this site

divided in two and operate as a caravan site at half the capacity with 100 housing units being developed on the other half of the site.

The application at Rosetta Road 13/00444/PPP notes that s75 obligations will be sought for affordable housing, education at £8,612 per house for primary and £1,213 per house for secondary, £1,000 per unit for a bridge and contribution for on or off site play park, the total cost of this is at least £10,825 per unit. These figures appear to have significantly impacted the viability of the project and caused it to come to a halt, Savills advised in 2017 that due to the contributions required to obtain planning permission, the development was no longer viable. PAN 2/2010 requires developers to realistically be able to provide the infrastructure requirements on a site, it would appear that in requiring the infrastructure here, the development is not viable and therefore will not progress. Since Savills correspondence in 2015, no activity on the application has occurred since April 2017.

Similar to George Place, recommendation should be made for this site to be removed from the upcoming LDP. The total contribution required for each housing unit is at least £10,825 which appears to have rendered the project unviable. Rather than hold out hope that this constraint may be removed it is put forth that SBC should consider more effective sites which have a realistic opportunity to deliver housing.

6 DESIGN RESPONSE TO FEEDBACK

6.1 Landscape

One of the most consistent concerns raised by individuals who have considered the suitability of Venlaw for residential development is the impact on the landscape. Specific points which have been raised include-

- Intrusion on landscape
- Impacts are being underestimated by the applicant
- The loss of agricultural land
- Fit with landscape
- The landscape character of Venlaw is considered extremely sensitive and development would damage this to an unacceptable degree
- Development will lead to the appearance of urban sprawl ascending the higher land to the east

In the 2018 LUC report development at Venlaw was again considered. LUC raised concerns regarding landscape impact and eventually concluded that the site be excluded from consideration for development. Many of the findings by LUC on Venlaw are not contested, for example, findings that views from points such as Manor Sware would be impacted by previous submissions for development at Venlaw are just.

The renewed proposal has been prepared by NORR and erz and the revised proposal submitted within the response has scaled back the development ensuring that housing is at the lower section of the site to minimise impact on views from the surrounding area. The LUC report considered that there was a low likelihood of being able to mitigate the impact on the landscape by developing Venlaw. Without further detail, this conclusion could only have been made on the assumption that the entire site is developed which is not the case now. Therefore, with this revised submission introducing a reduced scale and restricting development to the lower portion of the hillside the development would be far more in keeping with the surrounding landscape.

The site sits within a special landscape area and concern regarding this has been raised, however, all development in Peebles falls within this landscape area as it covers the vast majority of SBC and entirely covers Peebles. Policy EP5 in the adopted LDP addresses special landscape areas and requires SBC to safeguard landscape quality and have particular regard to the landscape impact of the proposed development. This requirement is entirely at the heart of the renewed application for Venlaw where an innovative design approach has been adopted to safeguard landscape impact and take all steps to retain the renowned landscape quality of

Tweed Valley. The scaled back development will also be more visually contained at the bottom of the Venlaw, combined these should provide sufficient mitigation to minimise previous concerns.

In undertaking a site analysis it is apparent that Peebles is strongly defined by its landscape setting. The settlement is focused on low lying land along the River Tweed and its tributary Eddleston Water, with open rural landscape to the valley sides creating the visual setting and backdrop to the town.

In recognition of the landscape character and setting of the town, the proposed development of the site is limited to its most low lying portion, along the western site edge. The proposed housing units are organised as a single row, sitting behind and parallel to the existing housing along the A703 (Edinburgh Road).

This arrangement retains the bulk of the site and all of the upper and more visually prominent parts of the site landscape unchanged as open grassland / meadow.

The proposed housing, infrastructure and landscape design is focused on integrating the development into the base of the slope along the lowest edge of the site. The built development and its roofscape will therefore sit at a very similar elevation to the adjacent and surrounding housing areas.

This approach ensures that the overall character of the town and its landscape setting is not significantly impacted on and that the rural character of the valley sides remains intact.

The two documented historic cultivation terraces on the steep slopes below Castle Venlaw Hotel are substantially unaffected by the proposed development. It is proposed that the lower terrace is enhanced as a community landscape space (community garden / growing space or similar).

The proposed housing development has limited impact on existing trees (one tree within the open grassland / meadow is removed and there are limited and localised tree removals associated with forming the vehicular access). Tree and mixed hedgerow plantings are proposed to integrate the development into the site and to provide a strong planted buffer between the existing and proposed housing.

Swales and other surface water management measures are proposed to the bottom edge of the retained grassland / meadow (above the proposed housing) and downslope of the proposed access road (above the existing housing). These measures will manage surface water and address issues of run-off from the existing grassland.

The proposed housing incorporates private garden space, with a carefully calibrated levels strategy. Vehicular access is via a 'homezone' type shared surface space to the front of the dwellings. Transitional hard and soft landscape treatments to the dwelling entrances will create a habitable edge and buffer between the private and shared space.

Development on the hills of Tweedale is somewhat inevitable, this point is recognised by the council's landscape architect, whether it be Venlaw or another site in the future, it is likely to happen. The development this report promotes is responsive to the needs of hillside development in SBC, steps have been taken to ensure design is sympathetic and of a scale that is appropriate to the site. Development of this type, which is considered and measured, should be far more welcomed than repetitive and unsympathetic development. Whilst it is not suggested that all development in Peebles will be on hillside sites, the challenging targets and reliance on Peebles to deliver these will only increase the likelihood hillside development coming forward.

6.2 Residential Amenity

Concerns have been raised in previous submissions regarding the impact on amenity for those who reside in close proximity to the proposed development, many residents felt that there was a high probability of their view being impinged. The response to this concern is consistent with other areas, the scale of development has been significantly reduced with the site layout now not encroaching up the hill as was previously planned. This mitigation has been conducted in response to the recognised impact that previous applications would have had on resident's amenity.

The approach to the design identifies a landscaped buffer between the houses and any development. The access road then provides further separation before the single row of houses. The houses are built into the slope so as to minimise the height above the properties on Edinburgh Road. The building line is approximately 17m from the rear gardens of the properties with a separation between the properties of 31m. The aspect of the site (west facing) ensures that southerly aspects are protected to ensure maximum sunlight to all properties.

Finally, it is considered that the proposal represents a high quality and innovative design and will in itself provide an aesthetic quality that will be to the benefit of the area and help to raise design expectations and aspirations in the area.

6.3 Listed Buildings

There are two listed buildings in close proximity to the site which have previously been highlighted, these are-

- Castle Venlaw Hotel and Terrace (B Listed)
- North Lodge with Gatepiers and Boundary walls (C Listed)

This topic was sufficiently addressed in the PPP report by the SBC Principal Planning Officer, an extract from his decision is provided below.

“Local Development Plan Policy EP7 requires new development to safeguard and respect the setting of statutorily listed buildings, two bordering the site to the south-east and north-west. Given the scale, orientation and roadside position of the C-listed Venlaw North Lodge to the north-west of the site, it is not considered that the suggested development would impact significantly on any setting, albeit there would be an increase in junction standard and road width and a slight urbanisation at the junction. The greater impact could have been on the setting of Castle Venlaw which is B-listed to the south-east of the site. However, the preservation of the cultivation terraces and a developable area being restricted to the north-east of the site allows appreciation and sufficient preservation of buffer space and setting of the building to remain.”

It is put forth that the revised development proposal at Venlaw would have little to no impact on the listed buildings. The PPP application in 2017 considered the impact and concluded that the development allowed the setting of the building to remain and the cultivation terraces have been sympathetically designed in to the development preserving their contribution to the area.

6.4 Transport and Accessibility

The location of the site is ideal in maximising the opportunity to increase the use of more sustainable modes of travel. The site has pedestrian connections to the surrounding facilities and the bus services to Edinburgh and heading to Central Borders.

For vehicular access the site benefits from an existing access to the Edinburgh Road and this access can be upgraded to accommodate the scale of development proposed with minor upgrades to the bell-mouth access. This access is within the settlement of Peebles and within a 20mph zone and ensures that appropriate visibility splays of the surrounding traffic movements is provided for. A Transport Statement and traffic analysis was undertaken for the previous proposal of 40 houses and on the basis of traffic monitoring all junctions surveyed continued to operate satisfactorily. A copy of this statement is attached at Appendix 3 of this report. Along this section of road there are multiple access points with the residential properties fronting the

road having direct access. The nature of this means that there is a need for traffic to move more slowly and provide a greater place function. It is an area where there is a need for vigilance from vehicles and any alterations to the street environment will further seek to slow traffic down in this area.

The transport impact from 22 dwellings is considered to be minimal, particularly when considered against other proposed developments in the town. Venlaw benefits from being on the north side of the River Tweed and therefore would not be subject to the provision for a new bridge. It is noted that the proposed crossing across the River Tweed which would have alleviated much of the potential traffic disruption has been postponed for at least ten years.

The Roads Planning department at SBC highlighted concerns in the PPP application that a proliferation of junctions in close proximity to the site access led to the application not receiving their support. It was further noted that mitigation measures provided to alleviate these concerns were not considered sufficient. The transport statement submitted in 2017 concluded that the trip generation from the site would be negligible. This statement was based on the understanding that development would consist of 40 units, this proposal is for 22 units. The development will utilise an existing access point and there is a reduction in the scale of the development which will significantly reduce the number of vehicles using this in comparison to previous submissions.

6.5 Archaeology

In response to concerns regarding archaeology, this renewed submission would ensure as part of its application that previous recommendation given by SBC's archaeology officer in 2017 be adopted. The officer recommended that the potential for archaeology on the site be investigated by an evaluation through trial excavation trenching over 10% of the total development area. This would allow reporting in accordance with a written scheme of investigation and ensure that development would cause no destruction or interference with historical remains.

Further to this, contact has been made with Historic Environment Scotland (HES) regarding the cultivation terraces to gain a greater understanding of the value of this unscheduled site. Through this correspondence, HES outlined that they were not overly concerned about the impact the development would have on this feature. As previously identified the cultivation terraces remain largely clear of development and there will be the potential to explore the use of this feature for community gardens if there was a desire for this from the local community.

Policy EP8 in the adopted LDP covers archaeology and states that historic assets in the Borders should have strong protection from any potentially damaging development. In 2010, during the LDP process, the reporter noted the presence of the historic cultivation terraces, however,

pointed out that the issues they posed were not insurmountable. The design for the renewed application has ensured that the cultivation terraces are not impacted by development and retained, this coupled with the archaeology investigation provides effective mitigation ensuring concerns on this topic are addressed.

6.6 Delivery

Much of the necessary investigations and studies have already been conducted as part of previous submissions and designs for the site have been progressed to ensure the Council can be "confident that land can be brought forward for development within the plan period and that the range of sites allocated will enable the housing supply target to be met" (SPP, para 119).

The development also benefits from having a developer in place and being in a highly marketable location in Peebles. Whilst some physical constraints are presented it is proposed that these have been adequately addressed and mitigation provided to allow the site to be reconsidered, its deliverability is a major benefit and the fact that it can be brought forward promptly within the first five year period provides a desirable attribute to the development.

6.7 Drainage

A drainage scheme would be provided within the development which would have wider benefits in the locality. Given its location and the sloping ground, it is understood that the properties along Edinburgh Road can be subject to inundation from surface water from the surrounding hill. The design proposals for Venlaw would incorporate a modern SUDS scheme introducing surface water attenuation between the development and the existing housing. The attenuation will be provided within the street and will capture surface water from the site and allow this to drain into the surface water system without effect to the existing properties.

6.8 Planning History

Reference is made in the PPP decision notice to the site's planning history with claim made that this is a relevant consideration to be taken into account in any decision. This is believed to be accurate, having reflected on previous approaches it is acknowledged that submissions were repetitive and did not consider feedback.

The proposal in this application seeks to rectify this repetitive approach with mitigation measures and responses to feedback in this renewed approach. With this fresh approach, it is trusted that the adapted approach is acknowledged and whilst comments from previous submissions are valid, the proposal is determined on the basis of the revised design solution.

It is acknowledged too that previous submissions may have been tempered with a degree of confusion centred on the number of dwellings being proposed, the figure swung from 40 to 26 and having read the feedback as well as public comments, it is clear that there was misunderstanding. The proposal for Venlaw here is explicitly for 22 dwellings on the site with the remaining land to be left open to public recreation.

7 CONCLUSION

In response to SBC's MIR, plans for development at Venlaw have been revised and submitted in support of reconsideration of the site as a proposal for allocation in the upcoming LDP. There is a demand for housing in Peebles identified within the HNDA and it forms part of the development strategy across the next twenty years for the region. SESplan2 allocates Peebles as a Strategic Growth area highlighting its importance to the local authority and wider region.

SBC have consistently struggled to deliver the housing targets expected with an increased challenge ahead to increase annual housing completions. Venlaw provides a potential solution to assist in achieving their housing target in a marketable and deliverable location.

Development at Venlaw has been pursued since previous processes with feedback on the proposals having been provided. It is felt that this proposal for Venlaw has taken a step back and considered every element of feedback provided in preparing a revised proposal for the development of the site. The development proposal now provides an opportunity to create a unique development which is respectful of the surrounding natural landscape and setting whilst providing benefit to the residents of Peebles.

The site is within control of a single party and ownership extends to the site boundaries ensuring that this development can be delivered speedily to contribute to meeting the housing supply targets and form part of the effective land supply.

As well as a renewed proposal for Venlaw, this report has sought to provide measured and effective feedback to the MIR through responses on two consultation questions. It is considered that there is a need for a comprehensive review of the effectiveness of allocations to ensure that a 5 year land supply will be maintained throughout the plan period that responds to the development strategy set out in the Proposed Plan. It is hoped that these responses are well received and adequate consideration is given to the comments made in response to the Main Issues Report.

APPENDIX 1.1 SUPPLEMENTARY GUIDANCE HOUSING SITES

HMA	Reference	Site Name	Capacity	Comments	Effective Units
Berwickshire	AAYTO004	Land North of High Street	6	Site has previously had planning permission that has expired and there is no indication that this site will come forward within a 5 year period.	
Berwickshire	ACOLD011	Hillview North Phase 1	100	Council led proposals in the surrounding area. No progress on existing allocations in Coldstream. Access has been opened up with EU funding. Access requires to be taken through employment allocation or through service yard.	
Berwickshire	AREST004	Reston Long Term 2	38	Phase 3 of the development brief in Reston. No progress on previous phases of development, site will not form part of the 5 year effective land supply.	
Central	AGALA032	Lintburn Street	8	Development has commenced.	8
Central	AGALA036	Rose Court	12	Planning application for demolition of 24 student residences and erection of 10 dwelling resulting in a reduction in supply of 14 units.	
	AGALA037	Former Castle Warehouse Site	30	Proposal for extra care housing.	30
Central	HAWI025	Leishman Place	5	Redevelopment of a flatted site, no net gain in housing supply.	
Central	AHAWI026	Henderson Road	6	Amenity ground at the back of an existing housing estate. Opportunity for housing would have been available prior to SG and this is a windfall site and with little prospect of contribution to land supply.	
Central	RHAWI011	Factory, Fairhurst Drive	10	2009 approval for 19 units expired, there is currently no developer interest and site is not anticipated to contribute towards the housing land supply within the next 5 years.	
Central	AKELS025	Tweed Court	15	Redevelopment of 1 to 15 Tweed Court, no net increase in housing supply as a result of development.	
Central	AKELS026	Nethershot (Phase 2)	100	Completion of phase 1 is forecast for 2030 therefore the additional phase of land at this site will not contribute towards the effective land supply within the current plan period.	
Central	RKELS002	Former Kelso High School	50	Site is on the market for sale following the completion of a new High School. Site comprises a listed building and there will be significant challenges and financial difficulties in delivering a viable development on this site. Conflict in terms of Council and community desires for the site. The site remains on the market after 8 months. Site should not contribute towards effective supply until a clear future is identified.	
Central	ANEWS005	The Orchard	6	Site was previously granted planning permission in principle in 2008 and development did not progress. The site is a windfall opportunity and at present there is no information to suggest that it will contribute towards the effective land supply.	

Central	ASELK033	Angles Field	30	Large portion of site at risk of flooding. SEPA commented that "Whilst SEPA supports the requirement for a FRA, the development requirement does not mention the fact that the site is likely to be heavily constrained due to flood risk and therefore recommend that the Council may consider removing this site from the LDP as it may not be able to accommodate the desired number of houses indicated". Eildon HA have suggested delivery of 6-8 affordable homes.	8
Central	MSELK002	Heather Mill	75	Site on the market for sale, no planning application for the residential development. The site is within the settlement. Equorium Property Company Ltd (formerly EWM Property Company Ltd) own the site and are willing to release the land for sale. No progress made towards delivery.	
Central	ATWEE002	Lowood	300	SBC now own the site and are to progress to adopt a masterplan for the area as supplementary guidance to be adopted 2020. There is a focus on the commercial elements of the development strategy by the Council. The planning authority will require a second vehicular access to the development and the Masterplan states that " If viable the proposed pedestrian/ cycle bridge across the railway (6) could be upgraded to accommodate vehicular traffic to service the residential clusters." The site is in Council control and private development will be subject to selling land for development and the Council bringing this to the market. Based on a work to be done and a phased development it is considered 200 units could be completed within the next plan period.	200
Northern	MINNE001	Caelee Mill	35	Site is already listed in the housing land audit and is not an additional site.	
Northern	MPEEB006	Rosetta Road Mined Use	30	Site is already allocated and application submitted for the site. There may be potential for additional units, but progress towards development has ceased and the agent has advised that the financial contributions render the site not viable. The additional numbers in the SG do not increase the capacity as has been applied for.	
Northern	MPEEB007	March Street Mills	70	PPP application submitted for the development of 69 homes. Application determination time scale 18 months with no decision. There requires to be a detailed design and viability and detailed planning / AMSC prior to any development commencing. Limited contribution. Brownfield site, programming in accordance with guidance.	70
TOTAL			926		302

APPENDIX 1.2: PEBBLES SITE PROGRAMMING

Site	Size (ha)	Capacity	Developer	Status	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	TOTAL	
TP7B Whitehaugh	9.9	106	Unknown	Complete	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TP200 Violet Bank Field	2.4	40	Mike Clay	Complete	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RPEEB003 Tweedbridge Court	0.53	50	Eidon Housing Ass.	Decision pending	0	0	25	11	0	0	0	0	0	0	0	0	0	0	0	36
APEEB026 Dunwhinny Lodge	0.5	16	Eidon Housing Ass.	Development Commenced	0	0	16	0	0	0	0	0	0	0	0	0	0	0	0	16
APEEB031 George Place	0.3	36	Owner	Non-Effective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
APEEB021 South of South Park	2.4	50	Persimmon	Effective	0	0	0	15	15	15	5	0	0	0	0	0	0	0	0	50
APEEB041 Violet Bank II	1.2	25	Miller Homes	Complete	8	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
APEEB044 Rosetta Road	5.7	100	Unknown	Non-Effective	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SPEEB003 South West of Whitehaugh	4.5	TBC	Unknown	Long Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

SPEEB004 North West of Hogbridge	2.9	TBC	Unknown	Long Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
SPEEB005 Peebles East (South of River)	32.3	TBC	Taylor Wimpey	Long Term	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SPEEB008 Land West of Edderston Ridge	19.5	TBC	Unknown	Preferred Longer Term Site	0	0	0	0	0	0	0	0	0	0	0	0	5	10		15	
APEEB056 Land South of Chapelhill Farm	7	150	Unknown	Preferred Longer Term Site	0	0	0	0	0	0	0	0	0	0	0	5	10	10		25	
SPEEB009 East of Cademuir Hill	13.2	TBC	Unknown	Preferred Longer Term Site	0	0	0	0	0	0	0	0	0	0	0	0	5	10		15	
Craigerne Coach House	0.31	5	Glentress Homes	Not in LDP- HLA	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0		2
Kingsmeadow Mansion House Holiday	0.77	24	Alan Mawer	No planning consent	1	0	0	5	4	4	0	0	0	0	0	0	0	0	0		13
East of Glentress House	1.88	33	Pension Fund	Unknown	9	24	0	0	0	0	0	0	0	0	0	0	0	0	0		24
Glentress Coach House	0.31	5	Glentress Coach House	Under Construction	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0		0
MESHI001 Land at Eshiels I	19.4	200	Unknown	Preferred Site	0	0	0	0	0	0	0	25	25	25	25	25	25	25	25		175
MESHI002 Land at Eshiels II	6.7	40	Unknown	Preferred Site	0	0	0	0	0	10	25	5	0	0	0	0	0	0	0		40

MPEEB007 March Street Mills	2.3	70	Moorbrook Textiles	PPP submitted to LPA	0	0	0	5	10	10	10	10	10	10	5	0	0	0	0
TOTALS	134	573			23	42	25	36	29	39	40	40	35	35	30	30	45	55	504

APPENDIX 1.3: REVIEW OF EFFECTIVE LAND SUPPLY

HMA	Reference	Site	Comments
Duns	BD69	Berrywell East	Partially constrained for market reasons.
Berwickshire	BD78	Langton Edge	Legal restriction on use, no planning permission and no developer.
Berwickshire	BD86	Todlaw Playing Fileds	2010 Audit listing, no progress to-date.
Berwickshire	BD87	Duns Primary School	No developer, no planning permission, demolition costs prior to any development.
Berwickshire	BE43	Acredale Farm	Planning approved for 30 affordable units only. Remainder of the site has no identified developer.
Berwickshire	BE49	Former Eyemouth High	Listed in Audit 2006, no planning approval, windfall site, when and if planning permission is granted.
Berwickshire	BL533	West Reston Mains Farm	Developer listed dissolved 2015. Planning Permission expired 2010.
Berwickshire	BR27	Auction Mart	Planning brief approved 2008. Application lodged 2008. Site sold to new owners and correspondence in 2015, but no progress on application. No progress in last 12 years.
Central	EEA63	East Turfford	No Planning application, no housebuilder and current development as Brownlie Yard is constrained due to market in this location.
Central	EGL165	Balmoral Avenue	No planning, no developer and access constraint.
Central	EL187	Philiphaugh Steading	Permissions expired no activity since 2007.
Central	ESE118	Kerr's Land	No Planning Application and no developer. Listed in Audit for 10 years. Not effective.
Central	ESE126	St Marys Church	Application withdrawn, no developer.
Central	RHA12	Crumhaughhill	Planning Permission expired on site, no progress since 2013, site is not effective.

Central	RHA128	Former Kings Hotel	Approved units are complete.
Central	RHA58	Gala Law	Planning brief prepared 2011, no planning application lodged and no developer listed.
Central	RJ59	Annefield	Outline permission expired 2011, no developer.
Central	RKE5	Rosebank 2	Only planning application is for retail.
Northern	TI77	Kirklands	No access available to site. Listed in Audit since 2006 and no progress.
Northern	TP120	Tweedbridge Court	Site identified for funding in SHIP for 36 units only, remove additional units from programming.
Northern	TP138	Rosetta Road	Caravan site, bridge crossing required and developers confirmed that requirement makes the development unviable.
Northern	TP91	George Place	Planning application for reserved matters refused 2008.

APPENDIX 1.4: STRATEGIC GROWTH COMPLETIONS

Area	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	TOTAL
Peebles	23	42	25	36	29	39	40	40	35	35	30	30	45	55	488
Innerliethen	2	0	20	32	22	11	5	20	20	22	22	22	22	22	242
Walkerburn	0	0	0	0	10	10	10	0	0	0	0	0	0	0	30
Galashiels	46	77	112	82	80	72	67	61	20	10	0	0	0	0	627
Melrose	10	10	24	25	11	10	5	0	0	0	0	0	0	0	95
Selkirk	2	15	35	27	33	18	15	5	4	0	0	0	0	0	154
Hawick	12	6	7	59	31	50	50	30	10	0	0	0	0	0	255
Jedburgh	0	1	30	35	43	37	41	39	35	11	7	0	0	0	279
Kelso	13	48	45	65	70	65	65	44	40	40	40	40	45	75	695
Eyemouth	0	0	0	0	0	25	25	25	25	25	25	25	25		200
Reston	0	32	10	15	25	25	25	25	25	21	13	0	0	0	216
Duns	0	0	2	2	6	5	5	0	0	0	0	0	0	0	20
Earlston	0	41	25	20	15	15	16	10	10	0	0	0	0	0	152
Newton St Boswells	0	6	10	20	20	20	20	24	20	20	20	20	20	100	320
St Boswells	19	34	10	40	65	95	95	58	50	50	15	0	0	0	531
Tweedbank	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Gattonside	3	2	17	11	10	10	10	9	0	0	0	0	0	0	72
Darnick	0	4	0	0	0	0	0	0	0	0	0	0	0	0	4
Eildon	0	0	0	2	3	0	0	0	0	0	0	0	0	0	5
TOTAL	130	302	372	471	473	507	494	390	294	234	172	137	157	252	4,401

APPENDIX 1.5: COMPARISON OF SUPPLY AGAINST TARGET

Area	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	2024/2025	2025/2026	2026/2027	2027/2028	2028/2029	2029/2030	2030/2031	TOTAL
Completions / Effective Supply	272	373	250	130	318	372	471	473	507	494	390	294	234	172	137	157	252	5296
Annual Housing Target	348	348	348	348	348	348	348	348	348	348	348	348	348	348	348	348	348	5916
Annual Housing Land Supply	383	383	383	383	383	383	383	383	383	383	383	383	383	383	383	383	383	6511
Variance																		-620

APPENDIX 2: PEEBLES SITES REVIEW

TP7B Whitehaugh (COMPLETED)

This site has a capacity of 106 and is not mentioned in the HLA for 2017. Site now appears to be complete having been granted planning permission in 2006.

TP200 Violet Bank Field (COMPLETED)

This site has a capacity of 40 mainstream and 13 affordable homes, it has been in the HLA since 2008. 50 of the 53 houses have been completed as of the most recent HLA, the site is expected for completion at the end of 2018 when the remaining 3 units will be finished.

APEEB026 Dunwhinny Lodge 12/00831/FUL (EFFECTIVE)

Site has capacity of 14, development led by Eildon Housing Association, was granted planning permission in 2012. Development has commenced at this site and it is considered effective.

APEEB031 George Place (INEFFECTIVE)

Site has capacity of 36 flats having previously been a mechanics garage located next to the Eddleston Water. Was added to the HLA in 2006 but no development has commenced, is estimated to begin in 2021 with completion over a three year period. Owner led development, owner is Techauto Ltd, Homes for Scotland only recognize sites that are owned or controlled by a developer.

Site still does not have planning permission having been refused in 2006. Outline planning permission was granted on the site for the erection of 36 flats subject to conditions and s75 agreement in May 2005 (04/01623/OUT).

Homes for Scotland note that any site which has appeared in the HLA for twelve years without significant recent progress is non-effective and should be re-considered when the LDP is next reviewed. This site has been in the HLA in 2006 and has made no progress since 2006.

APEEB021 Housing south of South Park (EFFECTIVE)

Site has capacity of 50 in HLA having been added to the HLA in 2016, no developer noted, however, it appears to be Persimmon. Currently going through planning process with application 18/01026/FUL which will be decided on 4th February 2019 at committee.

The planning permission being sought is for 71 units, a high degree of concern has been raised regarding the potential impact on the traffic should permission be granted, however, a road safety review concludes that there would be no issue to safety and a transport study concludes that there will be no need for an extra bridge to cross the River Tweed for several years. This appears to be in contrast to a variety of applications submitted on the south side of the river which insist on a bridge.

APEEB041 Violet Bank II (NEAR COMPLETION)

Site has capacity of 25 and has been in the HLA since 2016 with the developer being Miller Homes Ltd. Planning application made in 2015 (15/00378/FUL) whereby permission was granted for the erection of 16 houses. Site has had 8 completions thus far with a further 8 estimated for 2016/17 and 9 units noted as not being developed in the HLA. Site will likely be completed by end of 2019.

APEEB044 & MPEEB006 Rosetta Road 13/00444/PPP (INEFFECTIVE)

Site has capacity of 100 and was added to the HLA in 2016 estimating units being delivered from 2021 at a rate of 20 per annum. PPP application submitted in 2013 for mixed use development on site, still pending decision. The site currently operates as a caravan park and this would be divided in two and operate as a caravan site with half the capacity with 100 units being developed on the spare half. LDP notes that development should proceed in accordance with the requirements agreed by the council in the 13/00444/PPP application which is currently pending.

Developer contributions are required for affordable housing, education contributions of £8,612 per house for primary and £1,213 per house for secondary, £1,000 per unit for bridge and contribution for on or off site play park.

There has been no activity on the application for two years, some of the more recent correspondence indicates that the project is no longer viable development appraisal noting that a loss of £1 million would be made on the site. An earlier appraisal completed in 2013 suggested at that time the project was viable. This proposal is not promoted by a developer and the obligations will directly affect value. The site is not considered to be effective and the site remains in use as a caravan site.

SPEEB003 South West of Whitehaugh (Potential long term housing Subject to Review)

Site capacity TBC, no planning application as yet. No mention made to the development being proposed outwith the settlement boundary at this time.

Further concern has been highlighted on the transport impact the development would have with comment made for the need of a connecting road and criticism that no route has been safeguarded in the plan. There is a stated need for a river crossing to unlock development to the south of the Tweed, but this has been delayed by at least 10 years and the prospect of development during the next plan period is not likely.

SPEEB004 North West of Hogbridge (Potential long term housing Subject to Review)

Site capacity TBC, no planning application as yet and not mentioned in the HLA. Requirement of new bridge over River Tweed to allow development to proceed. Flood risk from Haytoun Burn is a constraint.

No mention made to the development being proposed outwith the settlement boundary and its possible contravention of policy PMD4 of the LDP.

Further concern has been highlighted on the transport impact the development would have with comment made for the need of a connecting road and criticism that no route has been safeguarded in the plan.

SPEEB005 Peebles East (South of the River) (Potential Long Term Mixed Use Subject to Review)

Site capacity TBC, however, it has been suggested at 200 homes in consultation events, land will be used for housing, employment and potential new school.

Requirement of a new bridge over the River Tweed to allow the development to proceed with vehicle links also required to site TP7B Whitehaugh which is near completion.

Developer is Taylor Wimpey, intention to apply for permission was submitted in 16/00721/PAN and a screening opinion, determined that EIA not required 16/01168/SCR.

Application was subsequently made in 2017 for planning permission in principle, 17/00606/PPP. This application saw a number of public objections and is not supported by SEPA on the basis of unsatisfactory mitigation measures being provided to prevent flooding, land raising proposed and the unsustainable nature of this and the roads network on the impact on traffic.

FROM MAIN ISSUES REPORT

SPEEB008 Land West of Edderston Ridge (INEFFECTIVE)

Site capacity TBC. Significant amount of infrastructure requirements on site as no suitable road connections and there is flood risk from Edderston Burn which flows through and adjacent to site, unknown if developer/ owner led development. No planning permission at present.

SEPA note the possibility of this development increasing the risk of flooding and as such a flood risk assessment would be required.

APEEB056 Land South of Chapelhill Farm (EFFECTIVE)

Site capacity of 150, improvements required to vehicle linkage over Eddleston Water, there is no planning permission at present. SEPA note the possibility of development increasing the risk of flooding and as such flood risk assessment is required.

SPEEB009 East of Cademuir Hill (INEFFECTIVE)

Site capacity TBC, development dependent on new river crossing across River Tweed, road linkage would also be required between numerous sites, no planning permission at present.

SEPA have highlighted there being a risk of flooding on the site on the 1 in 200 year flood map and development on the site has the potential to increase probability of flooding elsewhere.

NOTES

The following proposals are located on the south side of the River Tweed and subsequently impact the capacity of the bridge-

SPEEB003

SPEEB004

SPEEB005

SPEEB008

SPEEB009

APEEB026

APEEB021

Combined, these sites add up to 75.3 hectares of development land, it is realistic to assume that should all the development proceed that one further bridge will not be sufficient. The 'Preferred and Alternative' sites report notes that the issues highlighted individually are not

insurmountable and could be mitigated. On a site by site basis this may be the case however cumulatively these sites will clearly have a much more profound impact on traffic in the town and further considerable measures may have to be adopted to mitigate this. It was reported in the press in 2018 that public funding for a bridge crossing has been withdrawn and the project has been shelved for at least ten years.

APPENDIX 3.1: TRANSPORT STATEMENT

APPENDIX 3.2: ACCESS ARRANGEMENT



Sidon Ventures Ltd

Proposed Housing Development
Venlaw, Peebles

Draft Transport Statement

McIlhagger Associates
PO Box 26486
Glasgow
G74 9BU

Tel: - 01355 224888
E-mail:- info@mcilhaggerassociates.co.uk

June 2014

Section 1 - Introduction

- 1.1 Sidon Ventures Ltd propose to develop land at Venlaw, in Peebles, for housing. The site is at present used for agricultural purposes.
- 1.2 The proposal is for some 40 housing units (25% of which would be affordable), accessed off Edinburgh Road at the current access to the Castle Venlaw Hotel.
- 1.3 The site is located to the east of Edinburgh Road, on the north side of Peebles, as shown in Figure 1.1 below.

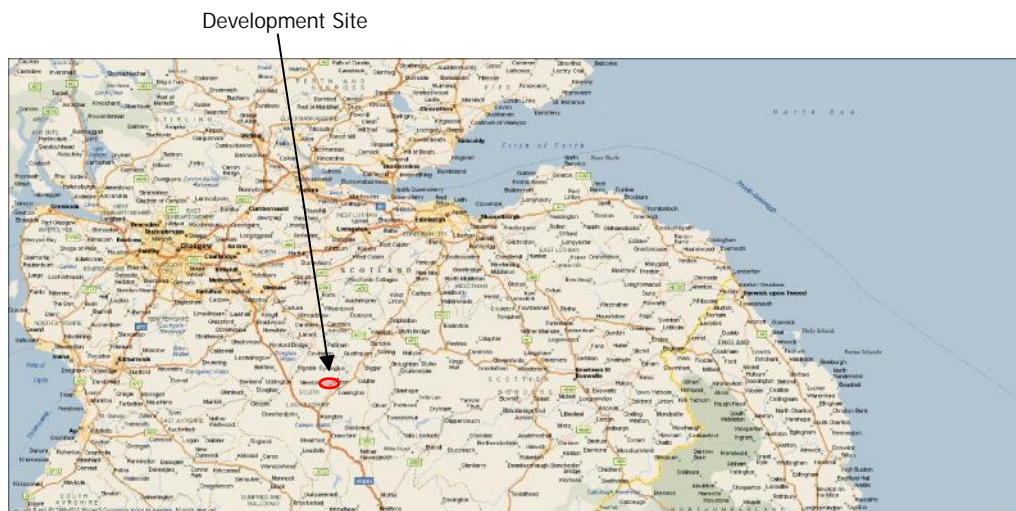


Figure 1.1 – Site Location (Not to Scale)

- 1.4 Access for pedestrians and vehicles is off Edinburgh Road.
- 1.5 Discussions have been held with Officials of The Scottish Borders Council.

Section 2 - Existing and Proposed Road Network

- 2.1 The proposed development site has an irregular shape, bounded on its north and east side by the access road to Castle Venlaw Hotel, to the west by Edinburgh Road housing and on the south side by open land, as shown in Figure 2.1, below.

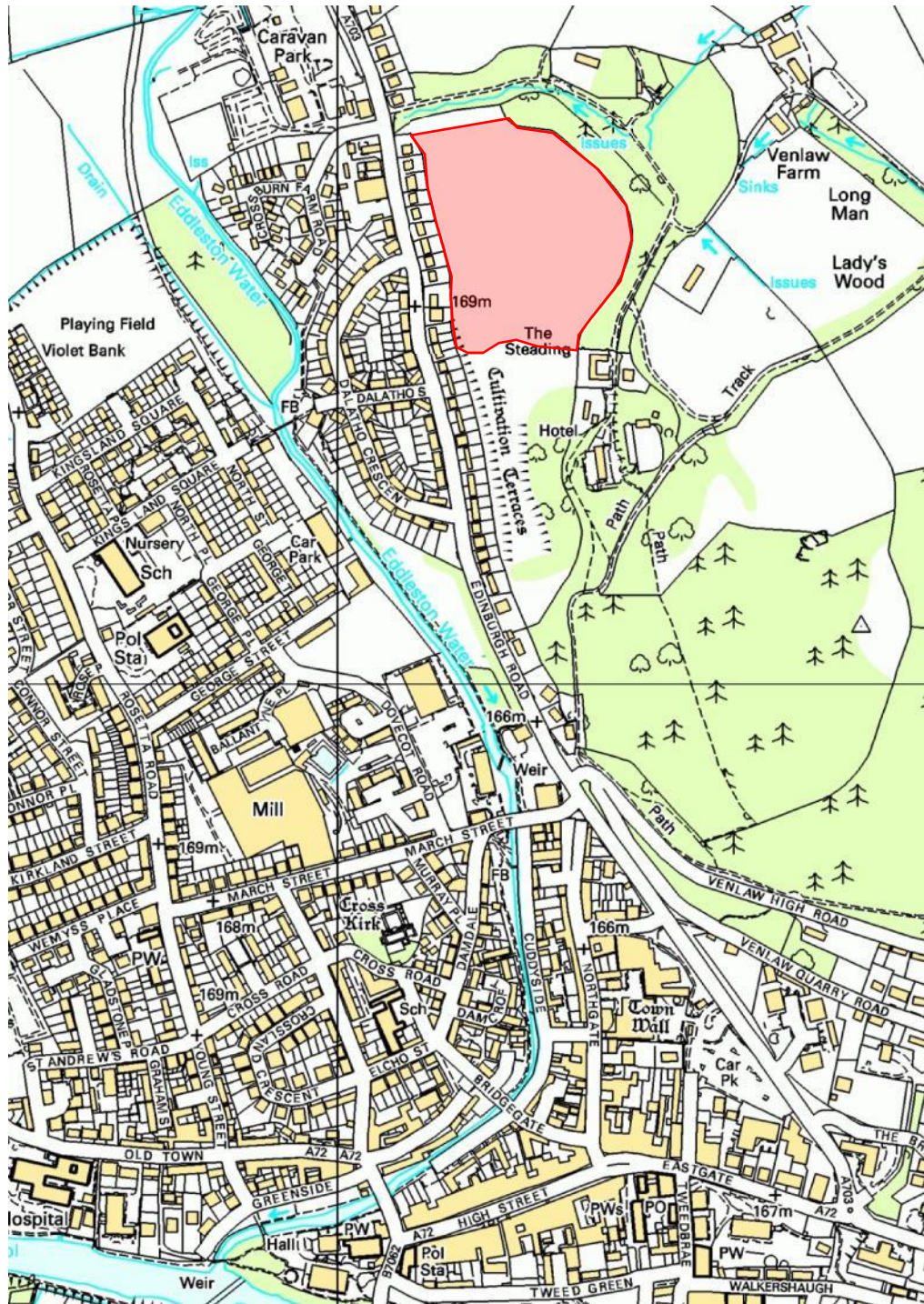


Figure 2.1 – Site Location (Not to Scale)

- 2.2 The site slopes upwards towards the east from Edinburgh Road.
- 2.3 Photograph 2.1 shows the development site (on the left hand side), viewed from the exit of the Castle Venlaw Hotel road.



Photograph 2.1 – Development Site (on LHS)

- 2.4 The site is at present open space in agricultural use.
- 2.5 The proposal shows some 40 housing units accessed off the Castle Venlaw access road.
- 2.6 Figure 2.2 shows Architect Morris & Steedman's indicative proposed layout for the site. It is reproduced here for reference purposes only. For any details, reference should be made to the original drawings.



Figure 2.2 – Indicative New Site Layout (Not to Scale)

- 2.7 Edinburgh Road and all of the other nearby surrounding roads have footways and street lighting and are subject to a 30 mile per hour urban speed limit.
- 2.8 It is proposed that pedestrian and vehicular access to the site would be off the Castle Venlaw access off Edinburgh Road.
- 2.9 Edinburgh Road runs north / south to the west of the development site.
- 2.10 Photograph 2.2 shows Edinburgh Road looking north from the site towards Edinburgh. Photograph 2.3 shows Edinburgh Road looking south towards Peebles. Photograph 2.4 shows the site access junction with Edinburgh Road from the east



Photograph 2.2 – View of Site Access from North



Photograph 2.3 – View of Site Access from South



Photograph 2.4 – View to West from Site Access

- 2.11 Photograph 2.5 is a view of Edinburgh Road on the approach to Peebles. The proposed site access is on the left hand side at the curve in the road.



Photograph 2.5 – Edinburgh Road towards Peebles

- 2.12 Photographs 2.6 and 2.7 below, show the existing adequate visibility splays from the Castle Venlaw access off Edinburgh Road.



Photographs 2.6 & 2.7 – Visibility Splays to Edinburgh Road

- 2.13 Edinburgh Road is a bus route. Photograph 2.8 shows the Peebles bound bus stop on Edinburgh Road, just east of the site entrance.



Photograph 2.8 – Edinburgh Road, towards Peebles

- 2.14 Traffic surveys were carried out at the Castle Venlaw / Edinburgh Road junction, including traffic from the residential Crossburn Farm Road on the west side of Edinburgh Road. Full result details are contained within Appendix 1 at the end of this Report.

2.15 Although there were no recorded issues or problems reported, The Scottish Borders Council observed that there were a number of potential traffic conflicts in the vicinity of the Castle Venlaw access, as follows: -

- Castle Venlaw access
- Crossburn Farm Road (staggered with Castle Venlaw access)
- Caravan Park access
- Petrol Filling Station exit
- Private houses

2.16 Photograph 2.9 below, shows the PFS, Crossburn Farm Road and the Caravan Park access, taken from the Castle Venlaw access off Edinburgh Road.



Photograph 2.9 – West side of Edinburgh Road

Accidents

2.17 The Crashmap website www.crashmap.co.uk displays publicly available details of reported road traffic accidents. It shows three incidents in the vicinity of the proposed development access to Edinburgh Road, classed as 'slight'; one on 25th February 2006 ((one vehicle and one casualty), one on 2nd November 2011 (two vehicles and one casualty) and one on 18th June 2012 (two vehicles and one casualty), one on to the south of Humble Road on 2nd August 2007 (2 vehicles and one casualty).

2.18 Precise details about the causes of these incidents are not known.

Section 3 - Accessibility

- 3.1 National and The Scottish Borders Council policies require developments to be accessible by foot, bicycle, public transport and private car.
- 3.2 Photograph 3.1 below shows the site hatched in red, the adjacent roads with bus stops shown in black.

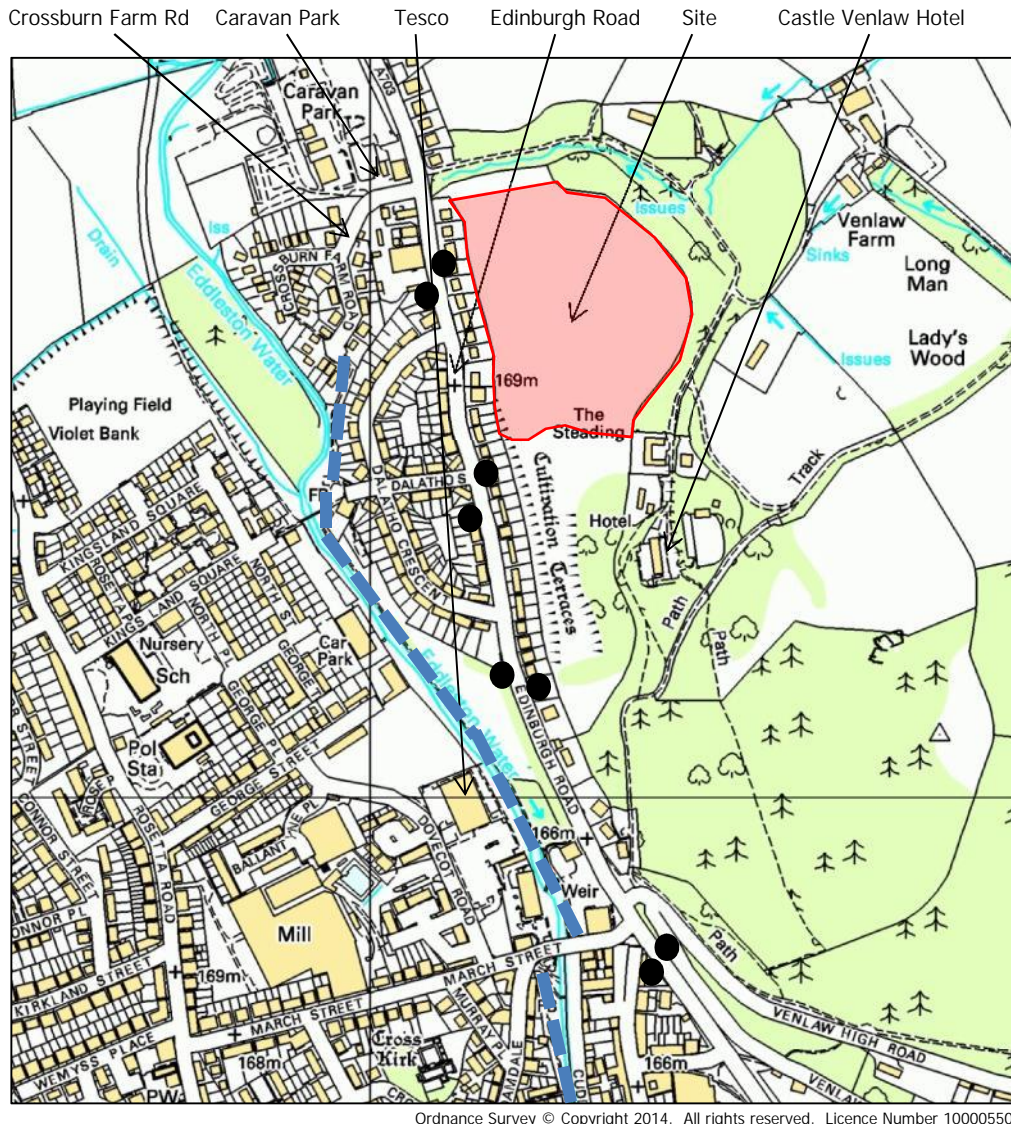


Figure 3.1 – Nearby Features Around Site (Not to Scale)

Pedestrian Facilities

- 3.3 All the nearby roads have footways.
- 3.4 There is to be a footway beside the proposed site access leading to the Edinburgh Road footways.

- 3.5 There is a Tesco Supermarket some 0.6 miles away. The town centre is some 1.2 miles to the south of the site.
- 3.6 There is a pedestrian footpath alongside the Eddleston Water (accessed off Crossburn Farm Road), leading to the town centre. This is shown dotted in Figure 3.1 above.

Cycling Facilities

- 3.7 The Sustrans webpage shows no cycle routes immediately adjacent to the site.
- 3.8 There is an on-road cycle route on the B7062 to the south of the River Tweed, on Regional Route 82 which connects Birggar to Berwick upon Tweed.
- 3.9 The Tweed Valley Railway Route is off-road and runs parallel to the A72, connecting the Peebles Hydro Hotel to Innerleithan, via Cardona, where it joins National Route 1.

Public Transport

- 3.10 There are existing bus stops on Edinburgh Road, within 400 metres of the site and therefore conveniently placed for the development.
- 3.11 Services at these bus stops include those identified in Table 3.1 below.

No.	Service (From/To)	Typical Daytime Details	Operator
62 / 62A	Melrose - Galashiels - Peebles - Penicuik - Edinburgh	Daytime Every 20 minutes Evening route – One per hour	Firstborders
X70	Peak service Peebles to Edinburgh	One per day each way	Firstborders

Table 3.1 – Existing Bus Services

- 3.12 It should be noted that bus services and frequencies are subject to possible changes. The information shown is current in June 2014.
- 3.13 The Scottish Bordes Council publish a booklet entitled Area Bus Timetable – Booklet No 1 – Peebles, Upper Tweed and West Linton’. The current booklet was published on 2nd December 2013.
- 3.14 There are no nearby railway stations at present. The Waverley Line is due to open in summer of 2015, connecting Galashiels to Edinburgh. Galashiels is some 19 miles from the site.

Private Transport

3.15 In order to determine the traffic effects of a proposed development on the surrounding road network, it is necessary to examine the following situations:-

- the effect of the development traffic during the peak network traffic period, and,
- the effects of the development traffic on the road network during the times of peak development traffic

3.16 Experience has shown that for housing developments, these situations tend to occur at the same time, during the weekday AM and PM peak traffic periods.

3.17 Using typical data derived from the TRICS database from multi-modal surveys of some 15 weekdays at housing developments, the rates in Table 3.2 were noted.

	AM In	AM Out	AM Rate	PM In	PM Out	PM Rate
People	0.26	1.03	1.29	0.69	0.43	1.12
Vehicles	0.17	0.53	0.70	0.41	0.24	0.65
Vehicle Occupants	0.20	0.80	1.00	0.56	0.35	0.88
Pedestrians	0.04	0.13	0.17	0.07	0.04	0.11
Public Transport	0.01	0.04	0.05	0.02	0.00	0.02
Cyclists	0.00	0.01	0.01	0.01	0.01	0.02

Table 3.2 – People Trip Rates

3.18 Therefore, with a development of 40 houses, as at Peebles, the numbers of trips made by people for the various categories would be as in Table 3.3.

40 Houses	AM In	AM Out	PM In	PM Out
People	10	41	27	17
Vehicles	7	21	16	10
Vehicle Occupants	8	32	22	14
Pedestrians	2	5	3	2
Public Transport	1	2	1	0
Cyclists	0	1	1	1

Table 3.3 – People Trips

- 3.19 From these figures, it can be seen that as the numbers of public transport users are relatively small, there would be no capacity issues on existing bus or train services.
- 3.20 It can also be seen that the typical Trip Rate for cars was 0.7 during the AM peak traffic period and 0.65 during the PM peak traffic period.
- 3.21 However, in order to ensure a robust assessment, weekday AM and PM peak traffic period trip generation rates of 0.8 trips per house (split 0.6 in the peak direction and 0.2 against) has been used.
- 3.22 Hence, as shown in Table 3.4, it is anticipated that during the weekday morning peak traffic period there would be the following amounts of generated traffic: -

Site	Houses	AM In	AM Out	PM IN	PM Out
Newbyres	40	8	24	24	8

Table 3.4 – Generated Traffic

- 3.23 Traffic surveys were carried out on Thursday 22nd May 2014 at the junctions of Edinburgh Road and Castle Venlaw Hotel access and Crossburn Farm Road.
- 3.24 The survey data are shown in Appendix 1 at the end of this Report.
- 3.25 The surveyed flows for the AM and PM peak traffic periods are shown in Figure 1 in Appendix 2 at the end of this Report.
- 3.26 Figure 2 shows the AM and PM generated traffic flows.
- 3.27 Figure 3 shows the combination of the 2014 surveyed flows and the generated flows.
- 3.28 The existing priority junction of Edinburgh Road with Crossdsburn Farm Road and the Castle Venlaw access road was analysed using the industry standard software package, Junctions 8, published by TRL Ltd., Version 8.0.4.487, dated 24th March 2014.
- 3.29 Analyses scenarios included: -
 - 2014 existing (surveyed) flows
 - 2014 existing plus effects of 40 additional houses
 - 2014 existing plus effects of 40 additional houses + 10%

- 3.30 The additional 10% was added to reflect possible growth over time. Using Nationally agreed Low Growth predictions, this represents about 14 years growth. For High Growth, it represents some 7 years growth.
- 3.31 Table 3.5 below shows a summary of the capacity assessment results for the junction for the weekday peak traffic periods for the year 2014, including the effects of the proposed houses. Full results are in Appendix 3.

Approach	AM RFC	AM Queue	PM RFC	PM Queue
<u>2014 Existing Situation</u>				
Venlaw Exit to North, West & South	0.00	0.00	0.00	0.00
Edinburgh Road southbound right turn	0.00	0.00	0.00	0.00
Crossburn Farm Road Exit	0.00	0.00	0.04	0.04
Edinburgh Road northbound right turn	0.01	0.01	0.03	0.02
<u>2014 Existing + 40 Houses</u>				
Venlaw Exit to North, West & South	0.06	0.06	0.03	0.03
Edinburgh Road southbound right turn	0.00	0.00	0.00	0.00
Crossburn Farm Road Exit	0.00	0.00	0.04	0.04
Edinburgh Road northbound right turn	0.02	0.02	0.09	0.06
<u>2014 + 40 Houses + 10%</u>				
Venlaw Exit to North, West & South	0.07	0.07	0.03	0.03
Edinburgh Road southbound right turn	0.00	0.00	0.00	0.00
Crossburn Farm Road Exit	0.00	0.00	0.05	0.05
Edinburgh Road northbound right turn	0.03	0.02	0.11	0.06

Table 3.5 – Summary of Junctions 8 Analyses Results

- 3.32 It is generally considered that junctions operate in a satisfactory manner when the Ratio of Flow to Capacity is less than 0.850.
- 3.33 As the above results show, the maximum RFC recorded (in 2014 with the proposed development plus 10%) was 0.11 for the PM right turn movement into Castle Venlaw Access.
- 3.34 Hence, it can be concluded that the junction operates, and would continue to operate, in a satisfactory manner.

3.35 By car, the distances (computed using the computer program Microsoft AutoRoute) from the proposed site access to nearby attractions are as follows: -

- Tesco Peebles 0.6 miles 2 Minutes
- Peebles Town Centre 1.2 miles 3 Minutes
- Galashiels 19.4 miles 30 Minutes
- Newtown St Boswells 27.1 miles 39 Minutes
- Edinburgh City Centre 21.8 miles 36 Minutes

3.36 Using the computer program Microsoft AutoRoute, the 10 minute and 30 minute drive time isochrones for off-peak traffic conditions are shown in Figure 3.1 below.

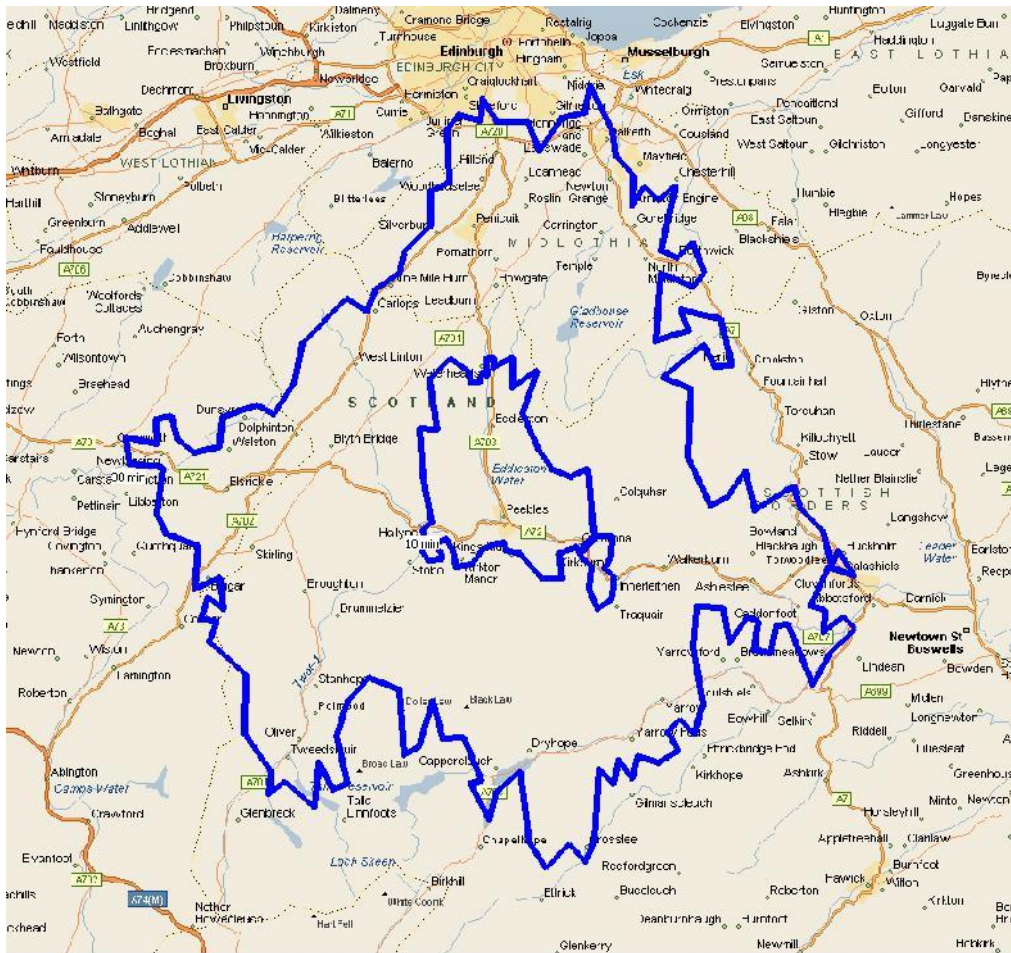


Figure 3.1 – 10 min & 30 minute Off-peak Drive Time Isochrones



- 3.37 It can be seen that the 10 minute off-peak isochrones includes most of the town of Peebles and the 30 minute drive time takes in the edge of the Edinburgh City Bypass.

Section 4 - Travel Plan

- 4.1 A Travel Plan (formally known as a Green Transport Plan or a Green Travel Plan) is a study of the different aspects of transport associated with a business or development, with an aim to reduce car use (and in particular, single occupancy car use during peak traffic periods).
- 4.2 The overall aims of a Travel Plan are to reduce the number of car trips made to / from the site, reduce traffic congestion around the site and encourage more walking and cycling.
- 4.3 For proposed developments, the Travel Plan should include references to walking, cycling and public transport facilities in the area and details should be available for new house buyers.
- 4.4 The Scottish Borders Council's website www.scotborders.gov.uk has links to various walking and cycling information sites in and around the area.
- 4.5 Local bus services are provided by FirstBus Borders.

Smart Phone Apps

- 4.6 There are a number of transport-related Smartphone Apps. A selection is shown in Table 4.1 below.

App	Published by	Description	Price
<u>Walking</u> walkit.com	WalkIt.com Ltd	Walking Route Planning	£1.99
<u>Cycling</u> CycleStreets National Cycle Network Bike Hub	CycleStreets Ltd Sustrans Bicycle Assoc of GB	Cycling Journey Planner Cycle Network Mapping 'Cycle SatNav'	Free Free Free
<u>Public Transport</u> Bus Checker thetrainline traveline Scotland	FatAttitude Trapeze Trapeze	Live UK Bus information Train journey planning / ticket sales Public transport journey planning	£2.19 Free Free

Table 4.1 – Smartphone Apps



Car Sharing

- 4.7 Car sharing can keep the convenience of door-to-door travel, but can reduce the cost for each person. Being flexible, it can work every day or just some days of the week and can therefore also reduce the number of vehicles on the immediate road network.
- 4.8 Local and national liftshare websites are available.



Section 5 - Conclusions

- 5.1 The site is conveniently situated for bus stops on Edinburgh Road, from which there are regular services towards Peebles and Edinburgh.
- 5.2 Peebles town centre is within easy walking distance of the site.
- 5.3 Trip generation from 40 houses would be negligible when compared with passing traffic levels.
- 5.4 Visibility from the proposed access to Edinburgh Road is good.
- 5.5 Capacity analyses for peak traffic periods at the junction showed a maximum Ratio of Flow to Capacity of 0.11 compared with a maximum desirable Ratio of Flow to Capacity of 0.85.
- 5.6 Recommendations for documents to be included in a 'Travel Plan' information to be displayed in the development for staff and visitors have been identified.

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Appendix 1

Traffic Survey Results



Appendix 2

Traffic Flows



Appendix 3

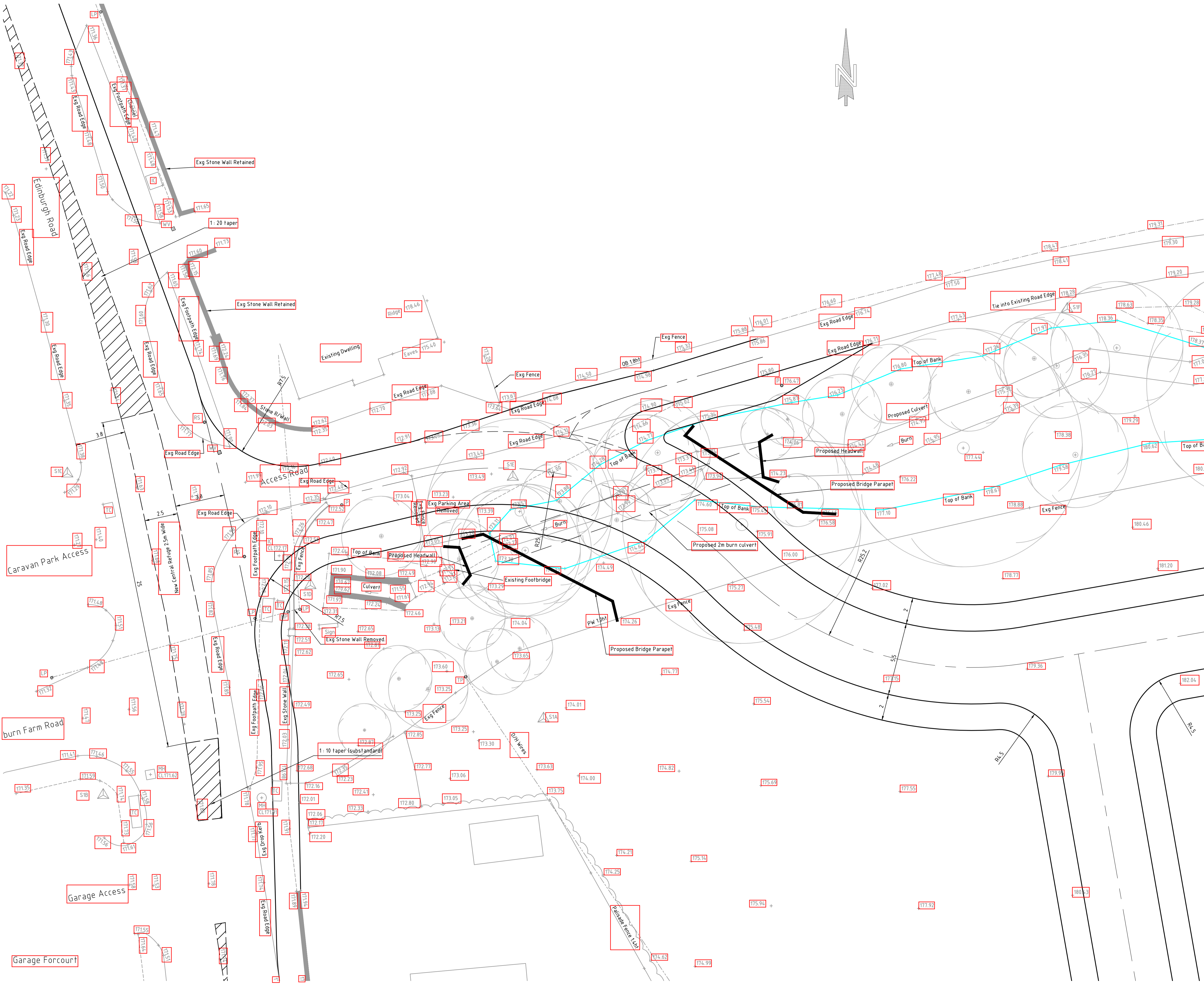
Calculation Results

NO DIMENSIONS TO BE SCALED FROM THIS DRAWING

CDM - RESIDUAL HAZARDS The following are considered to be significant risks relevant to this drawing, which could not be fully mitigated or removed through design:

CDM - RESIDUAL HAZARDS	
1	
2	
3	etc.

Further possible control measures have been identified within the Design Risk Assessments which may help to mitigate these and other identified risks further during the construction / maintenance process.



Revision	Date	Drn	Chk
P01 Initial Issue	18.01.17	SJK	SJK

Client
Rhubarb Blue Limited

Project
Residential Development - Venlaw Peebles

Drawing Title
**Proposed Site Road Access
General Arrangement - Option 2**

Suitability Status
S2 - Suitable for Information

Job No. Scale Site Rev
161650 1:125 @ A1 P01

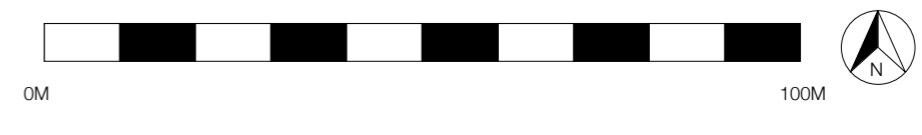
Drawing Number
000000-PEV-XX-XX-DR-C-0006
Project Code - Originator - Zone - Level - Type - Role - Number

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- Key
- Indicative Trees to be Removed
 - Existing Tree
 - Proposed Tree/ Shelterbelt Planting
 - Understorey Shrub Planting
 - Community Garden Path
 - Private Driveway and Terraces Within Gardens
 - Shared Surface
 - On Street Visitor Parking Bays (6 No)
 - Amenity grass/Lawn Within Private Gardens
 - Existing Meadow Retained
 - Shrub Planting within plot
 - Swale and Bund
 - Proposed meadow Planting
 - Retaining Walls



erz Limited
 21 James Morrison Street
 Glasgow G1 5PE
 T/F: 0141 552 0888
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Revisions:
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Project Title:
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Client:
 CARMICHAEL HOMES & INTERIORS

Drawing Title:
 Site Proposal

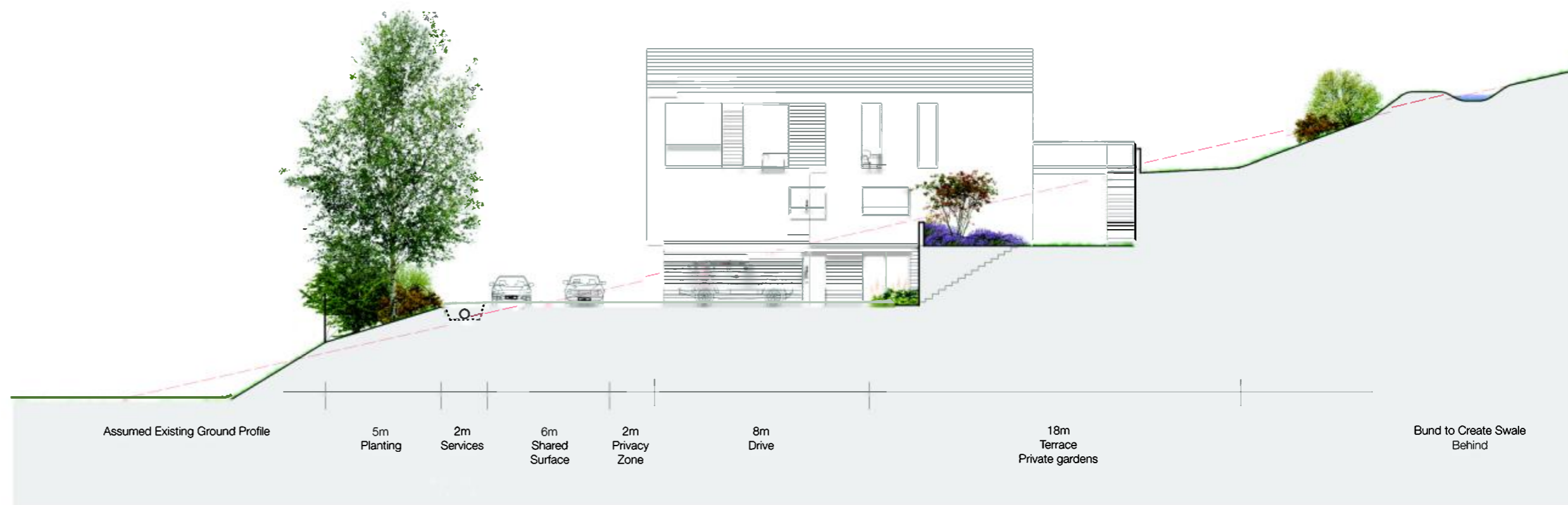
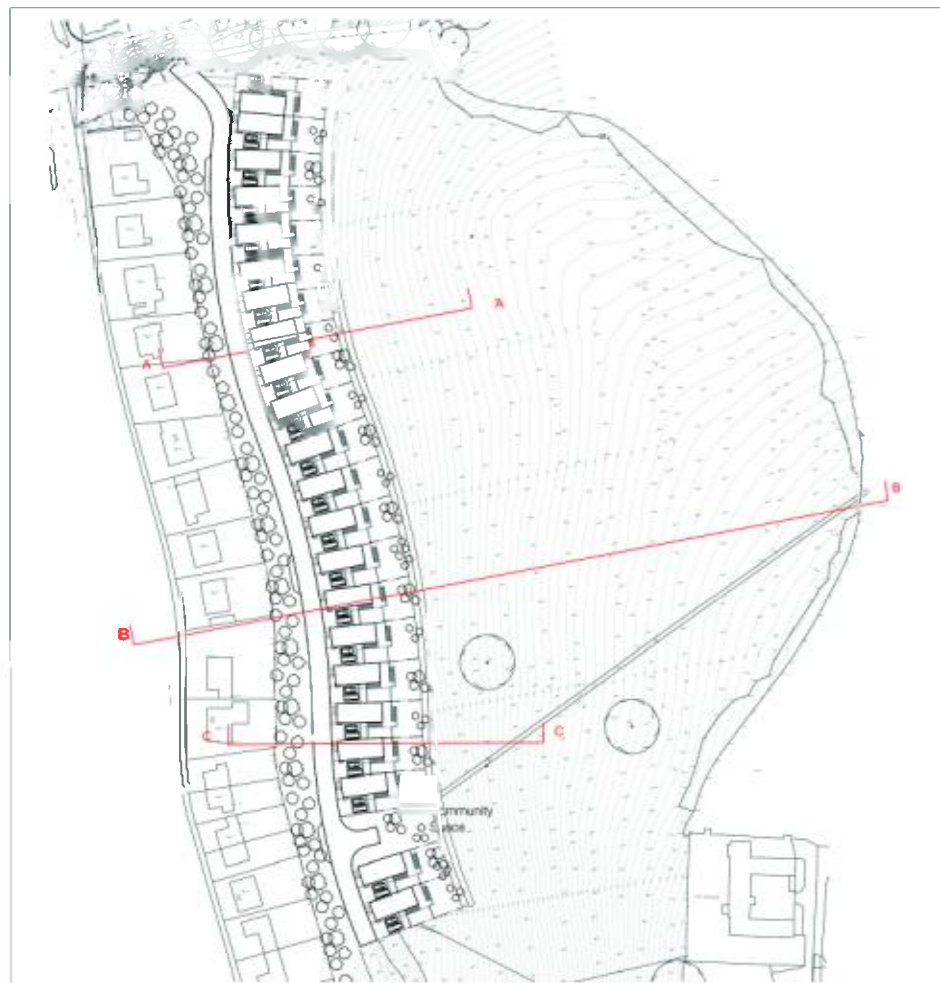
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PLANNING

Scale:
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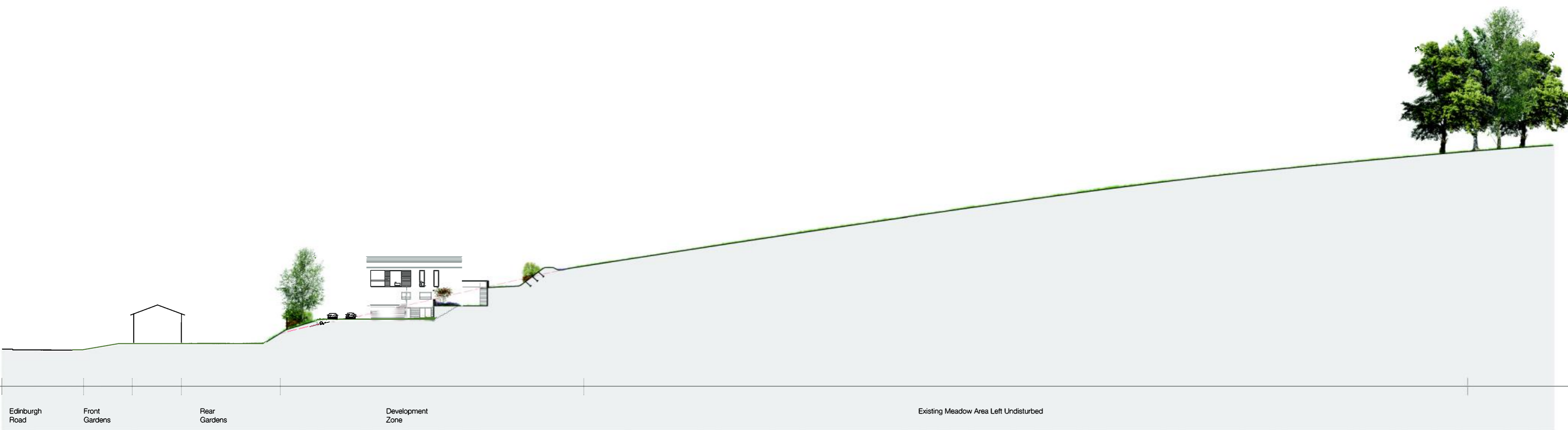
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Revision Number:
 -

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 29.01.19



Site Section AA
1:200



Site Section BB
1:500

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Project Title:
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Client:
CARMICHAEL HOMES & INTERIORS

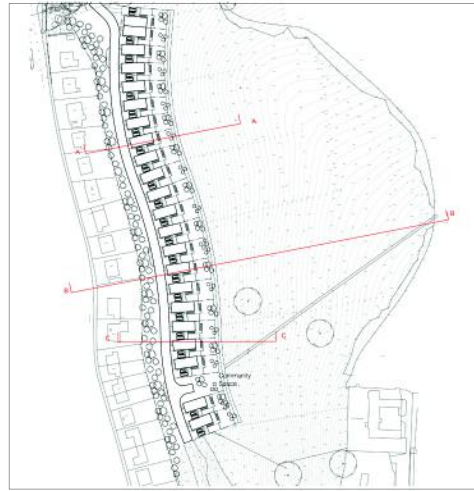
Drawing Title:
Site Sections AA and BB

Notes:
PLANNING

Scale:
Varies @ A2

Drawing Number:
erz/18/21/S01

Revision Number:
-
Date:
29.01.19



Location Plan 1:5000



Section CC 1:200

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 21 James Morrison Street
 Glasgow G1 5PE
 T/F: 0141 552 0888
 E: info@erzstudio.co.uk
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Revisions:
 First Issued:

Project Title:
 PEBBLES HOUSING
 Client:
 CARMICHAEL HOMES & INTERIORS

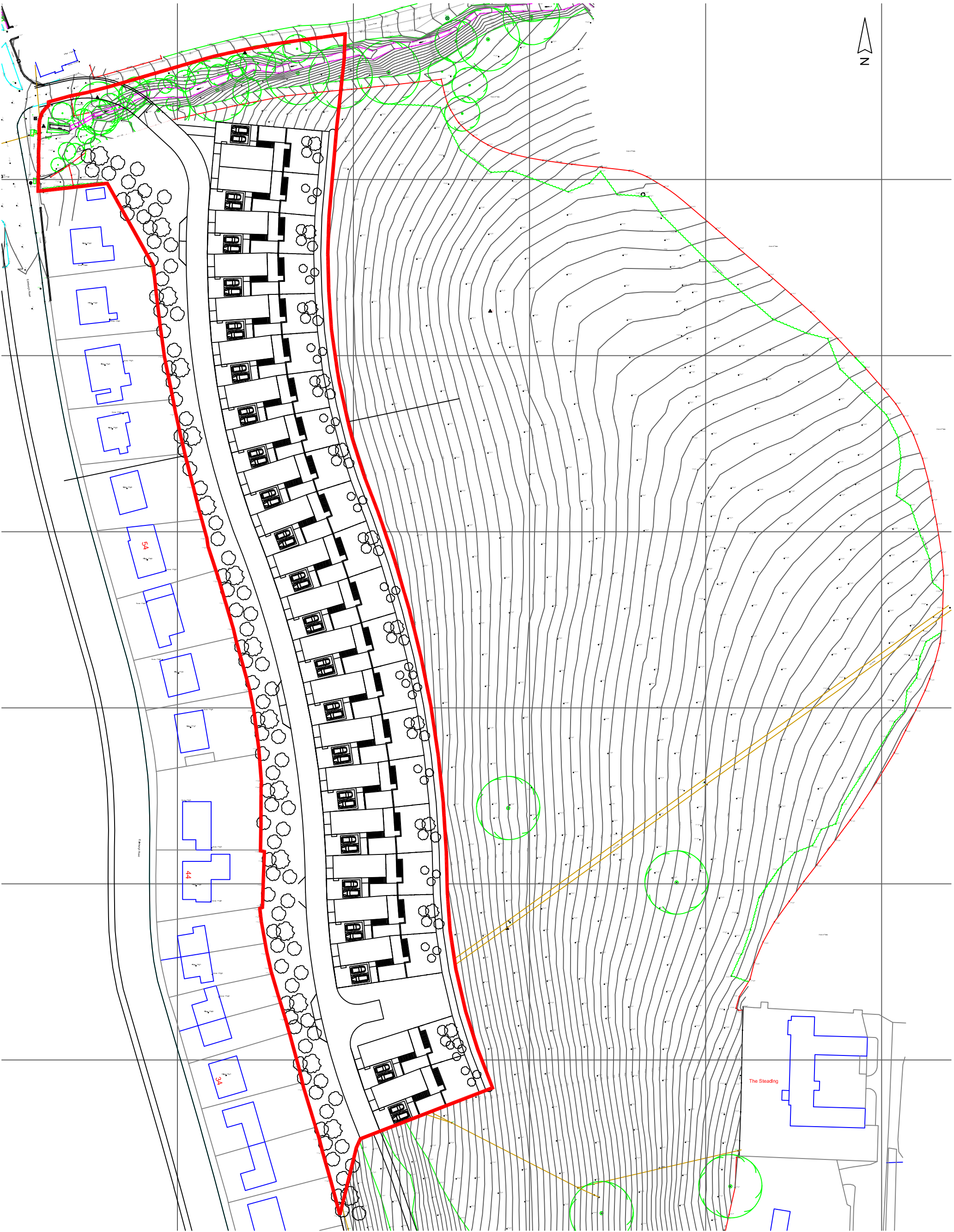
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Drawing Number:
 erz/18/21/S02

Revision Number:
 -
 Date:
 29.01.19



Revised: _____ Date: _____ Scale: _____

INFORMATION

Project/Client: Vanlew Peebles
Carmichael Homes & Interiors

Project No: IAGG18-0196
Town No: SK 009
Rev: _____

Drawn by: _____ Scale: 1:500 @A1
Checked by: _____

Date: _____
Date: 28/01/11
Date: 28/01/11
Date: 28/01/11

Site Plan

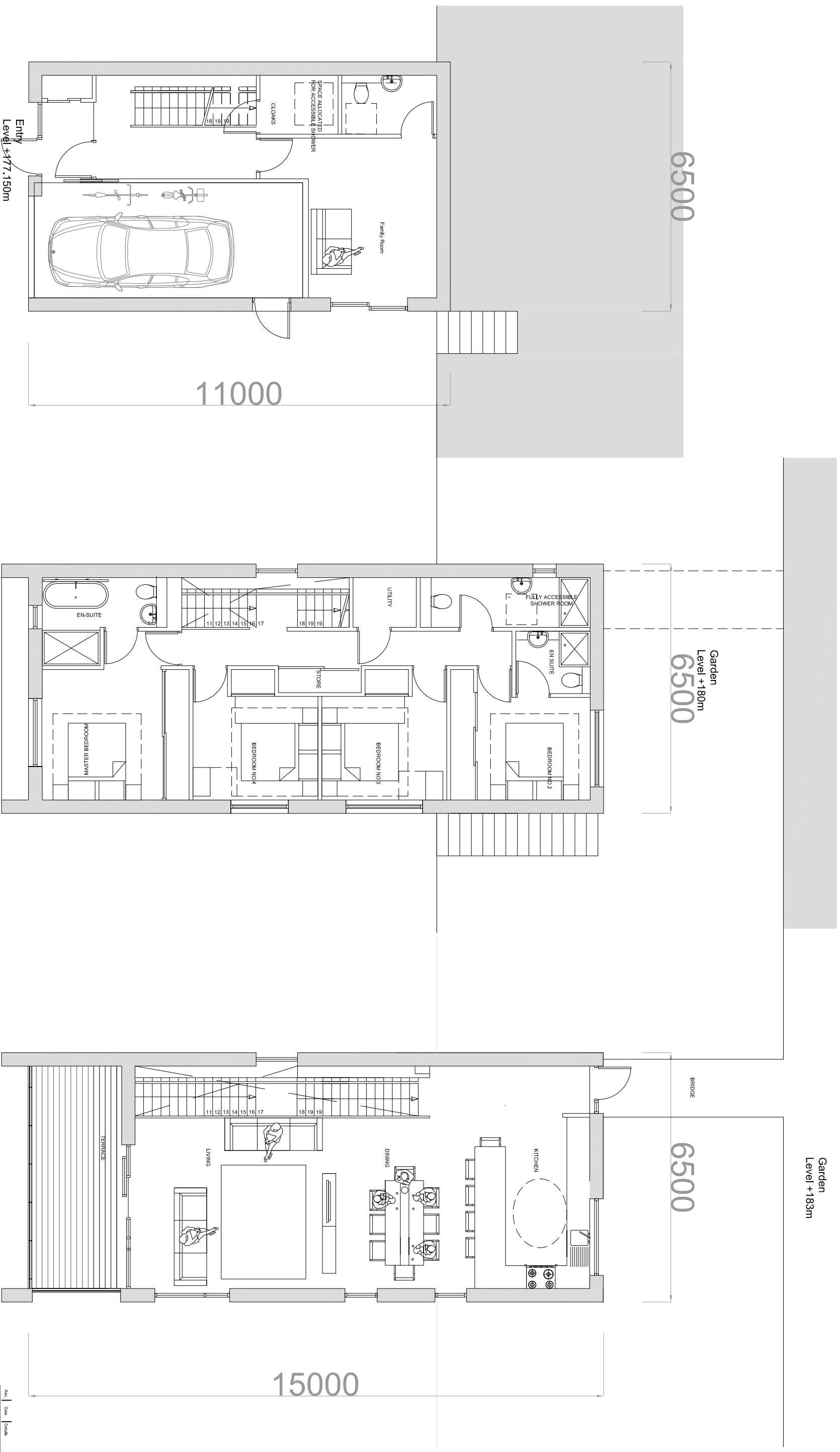
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T: +44 (0)141 204 6500 F: +44 (0)141 248 4444

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GARDEN ROOM FLOOR PLAN
Level +177.150m

GIFA EXCLUDING GARAGE: 38 m² / 409ft²
GARAGE GIFA: 21m² / 226ft²
TOTAL GIFA Incl garage:
210m² 2261ft²

GROUND FLOOR PLAN
Level +179.925m

GIFA : 83m² / 894ft²

FIRST FLOOR PLAN
Level +182.700m

GIFA: 68m² 732ft²

INFORMATION

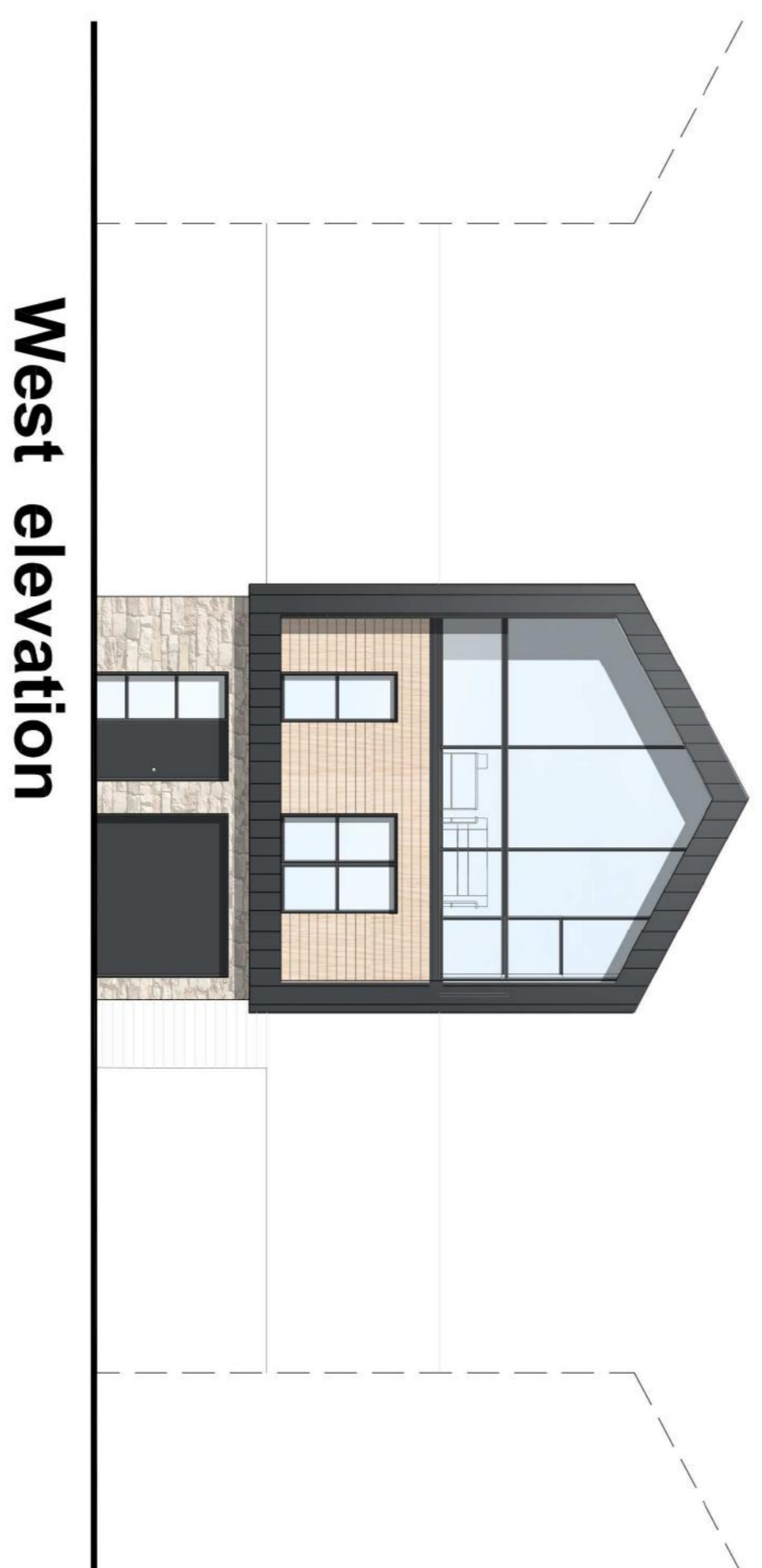
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Drawn by:	PBJ	Drawn Date:	28/01/11
Checked By:	PBJ	Checked Date:	28/01/11
Scale:	1:50 @A1	Drawn By:	PBJ
Drawn For:	Typical House Floor Plans	Drawn Date:	28/01/11
Rev:	1	Drawn By:	PBJ
Drawn Date:	28/01/11	Drawn Date:	28/01/11



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Bund to create swale behind



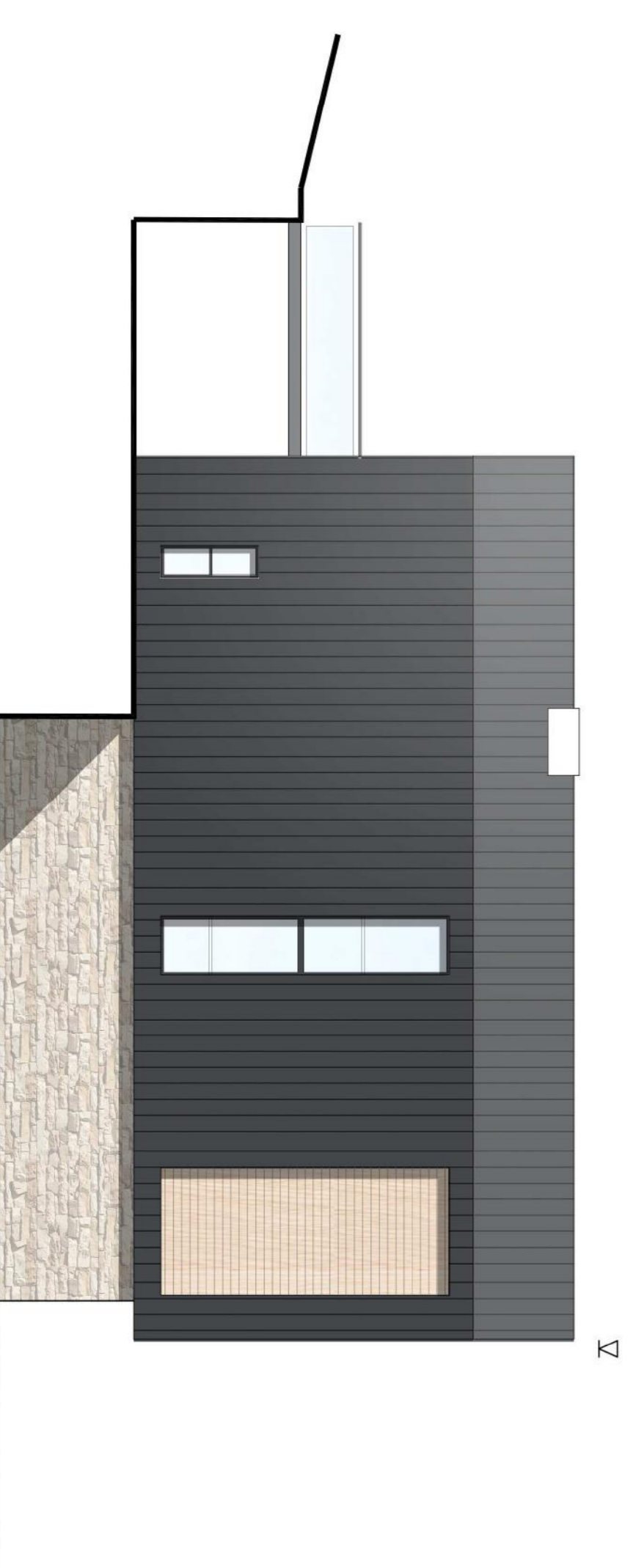
West elevation



East elevation



South elevation



North elevation

Rev	Date	Details	Drawn	Checked
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INFORMATION

Project/Client: Vanlaw Peebles Carmichael Homes & Interiors
Project No: IAGG18-0196
Drawn By: SK 011
Checked By: PBJ

Scale: 1:100 @A1
Drawing Date: 280119
Section & Elevations



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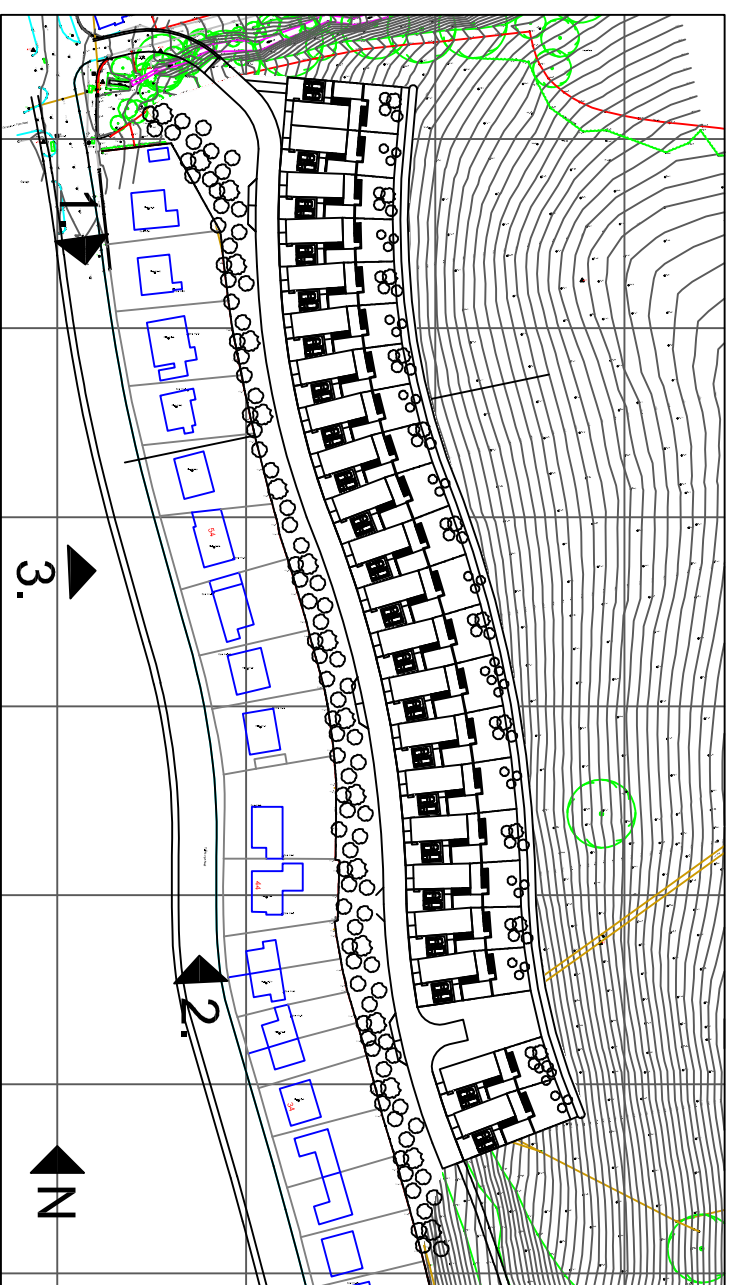
1. View South along Edinburgh Road.



3. View towards site from Edinburgh Road



2. View North along Edinburgh Road.



Rev	Date	Issue	Drawn	Checked
INFORMATION				
Issued for:			Scale:	
Project/Client:			Project No:	
Venlaw Pebbles			IAG18-0196	
Carmichael Homes			Dwg No:	
& Interiors			SK 012	
Drawing:			Rev:	
NTS			@A3	
Visualisations			Drawn By:	
CC			Date:	
31.01.2019			31.01.2019	
Checked By:			Date:	
CMC			31.01.2019	

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View from Rosetta Holiday Park.

Rev: | Date: | Scale: | Issued for: | Drawn: | Checked:

INFORMATION

Project/Client:	Verlouw Pebbles	Project No:	INAG18-0198
	Carmichael Homes & Interiors	Draw No:	SK 013
		Rev:	

Drawing:	Scale:	Drawn By:	Date:
Visualisation	M/S @A3	CC	31.01.2019
		Checked By:	Date:
		CMC	31.01.2019

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View North along development.

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INFORMATION				
Issued for:				
Project/Client:	Venlaw Pebbles	Project No:	INAG18-0196	
	Carmichael Homes	Draw No:	SK 014	
	& Interiors	Rev:		
Drawn:	NTS	Scale:	@A3	
Visualisation		Drawn By:	CC	Date: 31.01.2019
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