

Local Development Plans Team  
 Scottish Borders Council  
 Newtown St Boswells  
 Melrose  
 TD6 0SA

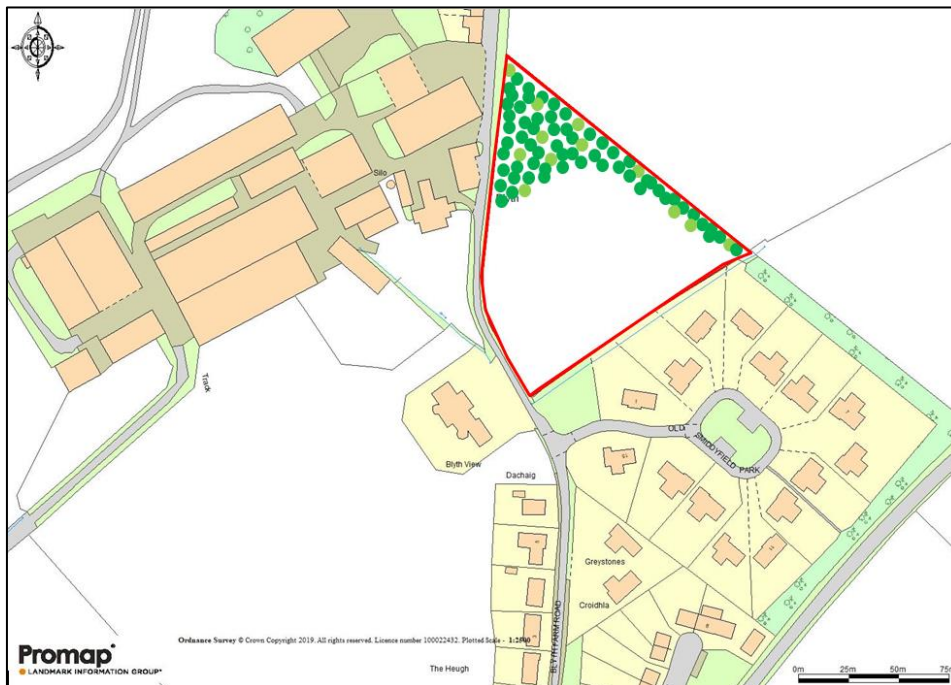
31<sup>st</sup> January 2019

**LAND TO NORTH WEST OF OLD SMIDDYFIELD PARK, BLYTH BRIDGE, WEST LINTON. REPRESENTATION TO LOCAL DEVELOPMENT PLAN 2 MAIN ISSUES REPORT**

Dear Sir/Madam,

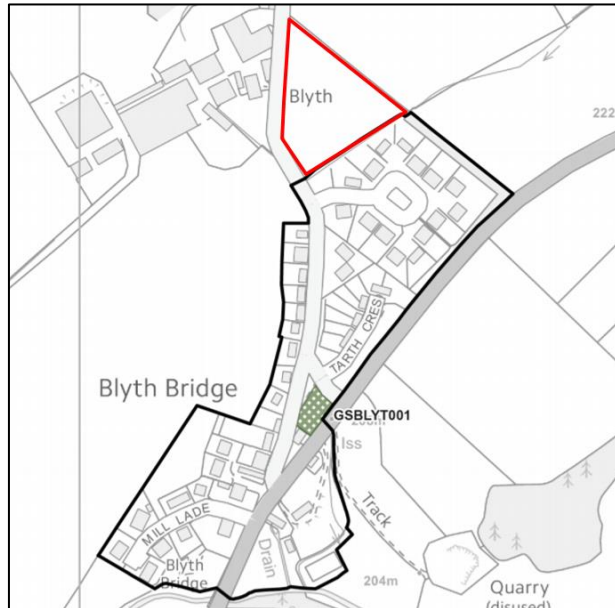
This representation is submitted on behalf of our Client, [REDACTED], owner of land ('the site') extending to 1.1 ha (2.7 acres) to the east of Blyth Farm Road and to the north west of Old Smiddyfield Park. The site lies immediately adjacent to the above-mentioned development at Smiddyfield Park which is accessed off Blyth Farm Road. The site lies within Blyth Bridge, an identified settlement within the Northern Housing Market Area.

**Fig 1:** The Site is bounded in red with indicative proposed landscaping



The submission which follows below addresses whether our Client agrees with the ‘preferred’ and ‘alternative’ options for additional housing sites within the MIR (Question 7 in the MIR). Our Client wishes to submit an objection to the non-inclusion of the site as a ‘preferred option’ for housing development with an indicative capacity of 6 units for the reasons outlined in this submission.

**Fig 2:** Location of the site in relation to Blyth Bridge.



Our Client has stated that there are no ‘ransom strips’ which would represent a constraint to development in respect of access or any other aspect of the site’s development.

In terms of flood risk, the site is not shown to be at flood risk within the SEPA 1 in 200 year indicative flood mapping.

In light of potential public sewerage capacity constraints, it is accepted that new developer-funded sewage treatment arrangements may be required. Subject to further investigation, capacity and confirmation of our Client’s legal position, there may be the potential to utilise the facility provided for the Smiddyfield Park development. Alternatively, contributions may be payable towards public sewerage infrastructure upgrades.

The site represents a logical small extension to the settlement, at a position immediately adjacent to existing development. It would be proposed that only the southern portion of the land be developed, as indicated in Fig 1., with woodland planting to the north. The site could be assimilated into the landscape setting through implementation of low density housing (approximately 6 units). Extension of the existing woodland shelterbelt in a north westerly direction would be proposed, together with formation of

woodland to the north west of the site as shown. This would provide a defensible edge and visual separation between the housing and the farm as well as helping to assimilate the housing into the landscape setting. It is considered that the proposal would not be detrimental to the landscape character and it is noted that there are no international, national or local landscape designations over, or in close proximity, to the site.

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

Dolphinton ADOLP004 (housing)	10 units	(Preferred)
Peebles, AEEB056 (housing)	150 units	(Preferred)
Eddleston AEDDLE008 (housing)	40 units	(Alternative)
Eddleston AEDDL009 (housing)	35 units	(Alternative)
Eshiels MESH1002 (Mixed use)	40 units	(Preferred)
Eshiels MESH1001 (Mixed use)	200 units	(Preferred)

Whilst the small scale of the site at Blyth Bridge is acknowledged, brief comment is made upon five of the sites with potential allocations in the MIR which lie in the Northern Housing Market Area.

### **Eshiels (MESH1001 and MESH1002)**

A separate representation has been made by Ericht Planning on behalf of many members of the Eshiels Community who object to the 'preferred allocations' for 240 new houses as part of mixed use development proposals (MESH1001 and MESH1002). The MIR Site Assessment for those sites highlights several potentially constraining factors in relation to lack of sewerage infrastructure, lack of roads infrastructure and archaeological constraints.

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

The importance of landowner and developer willingness to engage in taking sites forward for development is being acknowledged with allocations for 95 units in the current LDP being proposed for removal by the Council in the next LDP due to lack of landowner or developer interest in progressing

allocated sites for development. The designation of large sites as 'Preferred' options when landowner/ developer willingness is unknown may be regarded as premature.

#### **Eddleston (AEDDLE008 and AEDDL009)**

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

#### **Peebles (AEEB056)**

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

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

### **Summary**

Blyth Bridge is a popular place in which to live, mainly due to its countryside setting, combined with reasonable public transport links to both Edinburgh and Peebles/ West Linton and beyond. It is important that land allocations are made in sustainable and sought after locations where development proposals will come forward and be deliverable in a reasonable time-frame on account of demand and lack of major infrastructure constraints. There are no known insurmountable constraints to development at the subject site and whilst, admittedly, the land area is significantly smaller than that at Eshiels or Chapelhill, Peebles, there is genuine prospect of deliverability within the Plan period and the site can thus make a small but meaningful contribution to housing land within the Northern Housing Market Area.

Our Client believes that the site at Blyth Bridge should be progressed within an allocation within the LDP2 for housing development, with an indicative capacity of 6 units for the following key reasons:

- The site is considered to be capable of being delivered within the Local Development Plan lifespan due to lack of insurmountable infrastructure constraints, including a lack of any 'ransom strips'.

- The scale of development would be in keeping with the scale of this part of Blyth Bridge and represents a logical extension to adjacent to existing development.
- There are no landscape designations over the site. Development can be assimilated into the landscape setting and contained by appropriate structure planting, including extension of to the existing shelterbelt and planting of new woodland.
- The site is appropriate for low density housing, in keeping with adjacent development.
- The site would not give rise to significant visual impact.
- The existing access (Blyth Farm Road) can be used to access the development.
- There is considered to be over-reliance on large sites in the Northern Housing Market Area, as noted, where deliverability within the LDP2 lifespan is uncertain given infrastructure constrains, potential questions over viability (given significant new infrastructure requirements) and lack of knowledge over landowner willingness, as highlighted within LUC's Report.
- The subject site can make a relatively small but meaningful contribution to housing land within the Northern Housing Market Area within the lifespan of LDP2.

Our Client requests that the comments within this submission are taken into account and an allocation for housing development with an indicative site capacity of 6 units is made for the site.

Yours faithfully



Kate Jenkins

**ERIGHT PLANNING**