
Scottish Borders Local Plan Amendment Draft 2008 Objections on behalf of Teviotdale

teviotdale

Introduction

Geddes Consulting, on behalf of Teviotdale, welcomes the opportunity to make representations to the Scottish Borders Local Plan Amendment (Draft 2008).

Teviotdale is a new, Scottish house builder focussed on creating quality homes in rural areas and towns of Scotland. Given ongoing commitment to development in the Borders, Teviotdale understands the local housing market, and is continuing to promote and develop housing in the current economic climate, as there remains a demand for affordable yet desirable homes which are sustainable and efficient.

The Company now has control of a site in Greenlaw, part of which was previously allocated for housing within the Berwickshire Local Plan. This part of the site was considered at the Issues and Options stage of the Local Plan Amendment, but rejected on the basis of preliminary information presented on the flood risk. Following further investigations, the extent of the flood risk, together with other constraints and opportunities to the development of this site, have been identified and a proposal has been prepared to demonstrate how this site could be developed and the benefits to Greenlaw arising from this. This Report, 'Sustaining Greenlaw – Edinburgh Road Development Proposal', sets out the case for these Objections to the Local Plan Alteration.

The Structure Plan Alteration identified Greenlaw as a settlement that requires short term development of up to 50 units. The Local Plan Alteration has identified two candidate sites as options to meet this requirement, only one of which will be required now, with the potential for other to support further longer term growth.

At the time of preparation of the Structure Plan Alteration, and even this Local Plan Alteration, the economic and financial context were markedly different. As a consequence, the Council should satisfy itself that all sites allocated for development in the Local Plan amendment are effective.

Representations and Objections confirming developer interest and aspirations should be given an appropriate weight, given the general inactivity in the housing and construction sector.

Further, there is the need for a radical re-think of delivery mechanisms for developments requiring support from developer contributions, such as infrastructure investment, affordable housing, and education, with the need for a joint investment in infrastructure funding and a partnership approach between the developer and the public sector.

The objections made to this Local Plan Alteration are intended to assist the Council in the implementation of the Local Plan generally, and ensure the effective delivery of the proposed allocations in Greenlaw in particular.

Objection 1

Amend Proposal Map (Greenlaw) to accommodate a new site

*Objection to
Subject/Policy/
Proposal/Map*

Amend Proposals Map (Greenlaw) to include the site at Edinburgh Road, to ensure housing and economic requirements are delivered over the Local Plan period.

This will require consequential amendments to the Development Boundary (G8) and Land Use Proposals (H3) as shown on Drg. No. 08020/010.

The site is 12.3ha, and has capacity for a total of 120 new homes, taking account of the flood risk assessment.

*Grounds of the
Objection*

A report has been prepared by Geddes Consulting on behalf of Teviotdale, 'Sustaining Greenlaw – Edinburgh Road Development Proposal'.

This assesses the merits of the site at 'Edinburgh Road', and compares it with the candidate sites (both housing and Employment Land) proposed for allocation in the Local Plan Alteration.

It concludes that there are significant advantages to the allocation of the Edinburgh Road site, with an indicative capacity of 120 homes (taking account of the non-developable areas, including the flood risk assessment). This number of houses in Greenlaw is supported by the Structure Plan Alteration, which has identified a housing requirement of 50 homes within Greenlaw, and a further 100 houses as an allowance within the Berwickshire Housing Market Area. Development on this scale offers significant benefits, and is necessary to overcome any infrastructure constraints, while also providing a level to sustain Greenlaw with benefits for the whole settlement.

Please refer to the Report for further details and justification for this preferred allocation.

Objection 2

Objection to non allocation of land for longer term development in Greenlaw

*Objection to
Subject/Policy/
Proposal/Map*

Page 91 of the Local Plan 'Longer Term Development in Greenlaw' makes reference to the identification in the Structure Plan of the need for a further 1,000 units in the longer term development of Berwickshire HMA.

It repeats an assertion from the adopted Local Plan which *...identifies the land north east of the settlement for long term development subject to further detailed assessment.*

*Grounds of the
Objection*

No justification for this proposed direction of growth is provided, and the objector consider the Edinburgh Road site, to the west of the town, to be more appropriate for future growth.

This is demonstrated through the 'Sustaining Greenlaw – Edinburgh Road Development Proposal', which provides an analysis of the settlement and its services and facilities.

This position would appear to be supported by the recent decision at Planning Committee to grant the outline consent for an Affordable Housing development on the north side of Edinburgh Road (Application Ref 08/01773/OUT).

This section should be deleted from the Local Plan.

Objection 3

Objection to non-allocation of land for identified housing needs during the Local Plan period

*Objection to
Subject/Policy/
Proposal/Map*

The Local Plan Alteration responds to the Structure Plan Alteration's identification of the need for 200 houses in the Berwickshire Housing Market Area (Table 1: Structure Plan Housing Allowances 2006 – 2018).

*Grounds of the
Objection*

However, the Local Plan Alteration fails to identify locations for 100 of these houses, simply indicating they fall within the category defined as 'Rest of Area'.

It is necessary to provide more certainty to the local community and to the development industry if locations were identified for this planned future growth. This would be in accord with PAN 49.

This objection equally applies to the non-allocation of land required to meet the longer term housing needs identified in the Structure Plan Alteration.

The Local Plan Alteration should be used to identify all sites required to meet housing needs in this Local Plan period. This should include the allocation of the site at Edinburgh Road, Greenlaw.

Objection 4

Developer Contributions – need for equitable approach to infrastructure funding

*Objection to
Subject/Policy/
Proposal/Map*

The recently introduced mechanism of solely using developer contributions to provide upgrades to infrastructure (especially up-front) is no longer feasible in the current economic climate.

The Local Plan Alteration needs to consider the alternative based on a joint approach, bringing together the Council, developer, and asset owners, to address infrastructure deficiencies in a co-ordinated manner to resolve and deliver planned growth.

*Grounds of the
Objection*

All necessary works having a direct linkage to the impacts arising from the development need to be addressed by developer contributions.

Developer contributions are however intended to address the direct consequences or impacts of a proposed development, and not to resolve existing deficiencies in infrastructure.

Essentially, funding infrastructure is a joint approach from all sectors working in concert.

The funding of any essential infrastructure will be exercised through joint funding arrangements where essential infrastructure is financed on an equitable basis in accord with the tests of Circular 12/1996.

In the restricted financial regime of the "post credit crunch", the funding of infrastructure needs to be led by the public sector with its access to lower costs of financing.

The financial contribution required from the development needs to be subject to a Development Viability Assessment in recognition that, because of a series of factors, the financial contribution may need to be restricted to maintain the viability of the development.

Without the qualification of determining viability, the potential package of requirements may render a project non-effective. As an alternative, it may be necessary for the Council or infrastructure agencies to limit the financial demands on the development.

Objection 5 Objection to Halliburton Road site (AGREE002) being allocated for housing

*Objection to
Subject/Policy/
Proposal/Map*

Halliburton Road is a candidate site in the Local Plan Amendment, with an indicative capacity of 50 units. Part of this site has recently secured committee approval for an exclusively affordable homes development (indicative capacity 16 units) [Planning Application 08/01773/OUT].

*Grounds of the
Objection*

While Teviotdale recognise the merits of the application for affordable homes, it is considered that the remainder of the Halliburton Road site is less appropriate for housing development than the site at Edinburgh Road.

The 'Sustaining Greenlaw – Edinburgh Road Development Proposal' Report reviews this site and considers that there are a number of potential constraints to the development of this site. These include, but are not necessarily limited to:

- Providing an acceptable surface water drainage solution;
- Feasibility of necessary improvements to the staggered junction of Halliburton Road, Wester Row, and Edinburgh Road;

- Identifying Developer interest if access must be taken through affordable housing development.

This site should be deleted from the plan, and the site at Edinburgh Road allocated to meet housing needs in Greenlaw.

Objection 6

Objection to Marchmont Road II site (AGREE003) being allocated for housing

*Objection to
Subject/Policy/
Proposal/Map*

Marchmont Road II site (AGREE003) is a candidate site in the Local Plan Amendment, with an indicative capacity of 50 units.

*Grounds of the
Objection*

Access would have to be taken either from Church Hill or from Marchmont Road, through the BG200 housing allocation.

The nearby junction of Church Hill with East High Street has previously been identified by the Council as requiring realignment to accommodate development. It is not known if this is feasible within land ownership constraints. On street parking has also been identified as an access constraint, with the Local Amendment requiring the development to include parking opportunities for residents adjacent to the site. This is not considered to necessarily be to the benefit of urban character of the new development.

Access from Marchmont Road is constrained, and the site is located to the rear of existing housing. The lack of developer interest suggests this site is not currently effective, and current market conditions and site access constraints further undermine the potential that this site will be developed within the Plan period.

The Marchmont Road II site should be deleted from the Plan, and the site at Edinburgh Road allocated to meet housing needs in Greenlaw.