



SCOTTISH BORDERS COUNCIL LOCAL DEVELOPMENT PLAN 2 Response to MIR

On behalf of

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INTRODUCTION

1.	On behalf of the	apt planning & development is pleased to
	lodge this response to the publication of the Scottish Borders LDP2 Main issues Report.	

- 2. We provide comment on a number of the key questions in the section below and would welcome further dialogue on key issues for the area, such as new allocations for residential development and the ongoing evolution of the approach to development in the wider countryside area.
- 3. As a landowner and employer in the Scottish Borders, as well as supporting businesses in the provision of leasehold property and supply chain activities, and providing affordable rural housing for rent, would be delighted to be further engaged in the preparation of LDP2 and in the context of the comments made below.
- 4. More specifically, we own a proportion of two sites that have been identified as preferred sites in the MIR, namely, APEEB056, proposed for residential development to the north of Peebles and SPEEB008, proposed for mixed use development of business/industry and residential to the south west of Peebles.
- 5. At this stage in the process, we fully support both as preferred sites for future development. We can provide further context due to owning additional areas of land adjacent to these preferred site, potentially providing further flexibility for Scottish Borders Council (see accompanying plans).

SCOTTISH BORDERS COUNCIL LDP 2

Key Questions

- The MIR asks a series of 19 questions relating to the key themes of the LDP. It is not appropriate or necessary for us to respond to all of the questions and our specific comments are provided below.
- 7. QUESTION 1 Do you agree with the main aims of the LDP2? Do you have any alternative or additional aims? fully supports the main aims of LDP2 under the headings Communities, Growing Economy and Sustainability.
- 8. QUESTION 6 Do you agree with the preferred options for the provision of additional business and industrial land/mixed use land in the LDP2? Do you agree with the alternative option for mixed use land? Or do you have other alternative options? maintains their support for site SPEEB008 (South-West Peebles) for the potential future expansion of South Park Industrial Estate as part of a wider proposal to the immediate south-west of Peebles (also including future residential development.





9. is a part owner of this potential expansion land (see attached plan) as well as owning land to the west and south of **SPEEB008**.



- 10. Bearing this in mind, can potentially help the Scottish Borders Council create a long-term defensible boundary to this part of the Peebles, whilst enabling and delivering short, medium and longer term development, both business and industry as well as additional residential land simultaneously relieving pressure on other areas of Peebles.
- 11. Land to the south and west of the town centre (and on the south side of the River Tweed) has accommodated significant levels of development in recent years whilst land to the north, east and west is constrained by natural features and topography.
- 12. The area of land to the west of Edderston Road and Edderston Ridge is only gently undulating until it rises further to the west, is accessible via Craigerne Lane and Caledonian Road whilst has the ability, through further planting and the pattern of development to shape this edge to Peebles, providing a significant area of land for future phased development alongside a long-term defensible boundary to the town.
- 13. We acknowledge that certainty is required with regards to the requirement for and delivery of a new crossing over the River Tweed and are willing to work with the Scottish Borders Council in better understanding this requirement and helping with its delivery if at all possible.





- 14. The current preferred allocation is for 19.5 hectares of land, with approximately 6.5 hectares being promoted for the future expansion of South Park Industrial Estate. Of the remaining 13 hectares of land for residential development, we understand that a site immediately to the south of South Park Industrial Estate and comprising of just over 2 hectares is currently in the process of being sold to a major housebuilder.
- 15. By contrast (and including those areas included as preferred future allocations), controls over 50 hectares in the immediate area, giving them a unique ability to help shape this southwest edge to Peebles with an appropriate mix of landscaping, boundary treatments and (mainly residential) development.
- 16. 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? continues to support proposed preferred sites at SPEEB008 (as above) and APEEB056.
- 17. As alternatives and building on these potential allocations, owns further land to the west of **APEEB056** and to the west and south of speeb008. In assembling these wider sites, can provide additional or alternative sites for the provision of new homes (and business land).
- 18. **APEEB056** owns the land to the west of the road which dissects the preferred site as well as the continuation of the land to the west (roughly rectangular in shape and consisting of four fields) which although sloping up from east to west, could help deliver new homes to the north of Peebles either as part of the existing SPEEB0056 or as a new allocation ensuring a single ownership and potentially giving more certainty over the future delivery of the site.







- 19. is happy to work alongside the owner of the land to the east of their land holding (and has made contact with them to make this clear) or to work with the council to deliver new homes to the west on land solely owned by . The site benefits from good access onto Edinburgh Road (A703) enabling quick access into Peebles from the north, or easy access away from the town (without the potential for adding to congestion in the town centre).
- 20. The land slopes up from east to west creating the opportunity for attractive south-facing development as you move up the slope towards the west of the site. This would enable additional development, outwith the extent shown in the MIR but within a natural limit of development as defined through further dialogue and survey, design and layout work.
- 21. As the site falls to the east, the flood risk from Eddleston Water becomes more of a determining factor in the developable area on this side of the road. Land to the west of the road, presents an appropriate northerly expansion of development in Peebles whilst future proofing the potential development from any encroachment of the area at risk from flooding.
- 22. As above, is a significant landowner to the south-west of Peebles including some of the land preferred under site **SPEEB008**. This already has the potential to be a significant long-term allocation, but by including further land to the west and south, the Scottish Borders Council could manage the longer-term expansion of Peebles creating an attractive and managed edge to the town.
- 23. QUESTION 8 Do you agree with the preferred option for addressing proposals for housing in the countryside? Do you agree with the alternative proposal? Have you any other options which you feel would be appropriate? supports the Borders Council in seeking to protect the countryside from inappropriate, poorly designed and poorly located development.
- 24. However there is a place for good development across a range of locations across the Borders including those in the Countryside. believes that the alternative proposal, to allow some development in the countryside on the proviso that it can be justified by good design and acceptable impact on the surrounding area (visual/infrastrucutre etc.) should be supported.
- 25. There are numerous redundant or semi-redundant former cottages and farm buildings in the countryside that could be brought back into beneficial use (not necessarily bit more often than not, residential). However the cost of refurbishment/redevelopment coupled with limited financial returns means land and property owners cannot justify the outlay. Appropriate newbuild in addition to the existing property would help bridge this funding gap.
- 26. In addition many of these buildings are constrained by access difficulties or lack of modern services. In such cases relocating a house to a more accessible site could offer the council a realistic opportunity to deliver much needed rural housing whilst in principle simply replacing an existing building with a better located and more sustainably constructed alternative.





- 27. More flexibility is needed for development in the countryside to assist with diversification opportunities for rural businesses and to promote sustainable development. This is becoming more and more important as BREXIT looms and we face the very real problem of signficant funding being removed from our rural areas.
- 28. Modern living promotes less travel, working flexibly and from home whilst landowners (large and small) are needing to diversify (even without the unknown outcomes of Brexit) to ensure a viable existence in the Countryside.
- 29. There is clearly potential for well-designed innovative development in the countryside (of a variety of uses, not just residential) and future investment in appropriate development should be encouraged in promoting good practice and also in supporting the rural and wide Scottish Borders economy.
- 30. QUESTION 13 Do you support the preferred option? Are there any other matters relating to sustainability and climate change adaption which should be addressed? Do you have an alternative option? as a significant landowner and employer in the Scottish Borders (and elsewhere), WME supports the promotion of sustainability throughout their operations weather it be good working practices, minimising the need for travel, reducing waste and sustainable forestry practices. Will continue to support the preferred option.
- 31. QUESTION 18 Do you agree with the suggested policy amendments identified in Appendix 3?

 Do you think there are any other policy amendments which should be referred to? —

 supports the approach taken by the Scottish Borders Council and with the exception of the Development in the Countryside policy (as outlined above) have no further comment.

SUMMARY

- 32. Scottish Borders Council seeks to review the 2016 LDP and move towards the preparation of LDP2.
- 33. is an existing land and property owner and employer in the Scottish Borders with the ability to work with the Council to help deliver many of the aims of the LDP, including the provision of land for commercial and residential development.
- 34. supports many of the Councils key aims and objectives around the provision of business and housing land and the presumption in favour of sustainability and sustainable development.
- 35. On the specific issue of development in the countryside, we are strong advocates for the protection of the countryside from inappropriate development, but also supporters of innovative high quality development where development can be incorporated into the locality and landscape with positive or minimal impacts.





- 36. As the rural economy evolves and faces up to the challenges it faces, landowners and the Council must work together to ensure a vibrant thriving rural sector and this may require a robust but flexible approach to development in the countryside.
- 37. An innovative yet practical approach to the reuse of the existing stock of under-utilised property in desperate need of refurbishment and redevelopment coupled with pockets of complementary and enabling new development can go some way to providing new and affordable housing (both for sale and rent) whilst making the most of the resources already available. This could also involve the permitting of new development at better locations where current conditions preclude the redevelopment of isolated or poorly served existing properties.
- 38. was pleased to see the inclusion of parcels of their land included at preferred sites SPEEB056 and APEEB008 and fully support this approach.
- 39. As explained above and illustrated in the plans accompanying this written response, has the ability to explore the potential of both these sites as they control significant parcels of adjacent land. Both sites could be considered for additional development and both sites benefit from locations and site specific characteristics to create longer-term defensible boundaries to the north-west and south-west of Peebles. would be delighted to discuss this further with Council officials.
- 40. will continue to support the work of the Scottish Borders Council in the preparation of LDP2 and look forward to further engagement as the process continues.















