

Mr Brian Frater  
Service Director Regulatory Services  
Council Headquarters  
Scottish Borders Council  
Newtown St Boswells  
Melrose TD6 0SA

15 January 2015

Dear Mr Frater

### **Concern about the proportion of windfall sites in Peebles**

With the recent granting of planning consent for the housing development at the Peebles Hydro Hotel of 30 units and the current planning application to convert Kingsmeadows House holiday accommodation to 12 permanent flats we are becoming concerned about the proportion of windfall sites over and above the planned expansion of the town stated in the Proposed Local Plan.

We wrote in response to the invitation to consultation of the Proposed Local Plan on 26 February 2014 citing windfall pressures on Peebles. We also wrote a separate letter querying PAN 2/2010 and the definition of the size of potential windfall sites.

The Proposed Local Plan states the provision in Peebles for 75 units for the planning period to 2024 on two sites: APEEB021 South of South Park for 50 units and ABEEB041 Violet Bank II for 25 units. If these two windfall sites are taken into account 42 of the 75 units to meet the planning need for Peebles would be provided by windfall sites. We are disregarding the occurrence of single or double windfall units as these are reasonable in any period and in the last planning period only amounted to some 17 units.

There is a further planning application currently being considered by the Council for development at the Rosetta Holiday Park for some 130 units. If this application obtains planning consent then the total number of housing units rises to 247 if the 75 planned units are built as well.

The Proposed Local Plan Appendix 2 lists in table 3 the completions for the period 2008 - 2012 for the whole of the Borders an average of 46% (503 completions of which 229 are windfall). In the case of Peebles this would be some 60% (247 completions of which 172 are windfall) PAN 2/2010 Housing Land Audit – Windfall Sites states in paragraph 62 that once planning consent has been given these can count towards meeting the housing land requirement. However, we believe that the increase in supply by nature of windfall sites is not taken into account to replace the planned sites so local over development occurs.

The pressure on development in Peebles is recognised in the SESPlan Main Issues Report chapter 8 paragraph 8.98 that specifically refers to future development pressure in Peebles: *‘The Western Hub, particularly at Peebles, has been subject to significant development pressure that will need to be distributed over a wider area within the hub’* Surely the control of windfall sites should be related to need rather than developer demands. The uncontrolled addition of this category of housing places undue demand on infrastructure, services and compromises the landscape capacity of the town which should be the limiting factor. The uncontrolled addition of windfall units rather undermines the intention of the Local Plan that has been produced at significant cost and effort by the Council’s planning officials.

Could you let us know the Council’s policy in dealing with cases where the windfall situation so distorts the provision of housing in relation to the planned provision? Also how does the Council address the question as to how windfall applications can be effectively controlled in terms of capacity while taking into account the planned provision? We are at the beginning of the planning period to 2024 and already we are experiencing pressure on development here in Peebles.

Yours sincerely,  
Gerard Bakker, Sec Peebles Civic Society

Copy - Tweeddale Councillors  
Peebles Community Council

