

F E R G U S O N  
P L A N N I N G

Holiday Accommodation at Burnmouth, Eyemouth

Stonefalls Development Partnership

March 2022

## CONTENTS

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INTRODUCTION.....	01
THE PROPOSAL.....	07
PLANNING POLICY.....	10
PLANNING ASSESSMENT...	14
CONCLUSION.....	17



F E R G U S O N  
P L A N N I N G

Holiday accommodation at Burnmouth, Eyemouth

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INTRODUCTION

## INTRODUCTION

- 1.1 This Planning Statement, prepared by Ferguson Planning, is submitted to Scottish Borders Council on behalf of our client Stonefalls Development Partnership (the applicant) in support of a Full Planning Application at the Land a Stonefall, Burnmouth (the 'Site').
- 1.2 The site sits between Burnmouth Harbour and Burnmouth Village to the west. The site is approximately 6 miles to the north of Berwick-Upon-Tweed and 3 miles to the south of Eyemouth. The topography of the site slopes steeply from the south towards the northern boundary, adjoining the coastline. The Site Location Plan can be found in Figure 1 and 2.
- 1.3 The site is currently occupied by existing woodland foliage to the east, and a single-track B road to the Southern Boundary with additional woodland beyond. Adjoining the site to the west is Burnmouth Parish Church.
- 1.4 The planning application submission relates to the construction of three new one-bedroom holiday cabins and associated site works.
- 1.5 The purpose of this statement is to provide detail of the proposals and set out the key material considerations in the determination of this application. The remainder of this statement is structured as follows:
  - Section 2: The Proposal
  - Section 3- Planning Policy
  - Section 4- Planning Assessment
  - Section 5- Conclusion



Fig 1: Site Location Plan (Source: CSY Architects).



Fig 2: Aerial Image of Site Location



**Fig 3:** Previous Cottages

- 1.6 The Site previously occupied three fishermen cottages as illustrated in figure 3. The cottages were demolished in 1950 and there is still remanence of the demolished cottage’s walls on the site.
- 1.7 In terms of neighboring heritage assets, Burnmouth Parish Church adjoins the site to the east. Although the church does not hold a historic listing, it is evident there is historical and architectural merit within the building.
- 1.8 The Burnmouth Coastguard Cottage is to the south and a one a half storey domestic dwelling further to the west of the site.
- 1.9 The Category B Listed Barmouth Harbor is the nearest statutory listed property. Careful consideration has been taken to ensure the proposal will not impact the character and setting of the listing.
- 1.10 With reference to the LDP Proposals Map, the majority of site is within the development boundary with the western edge falling just outside. There are no other designations or allocations on the site.
- 1.11 The Scottish Environment Protection Agency (SEPA) are the statutory body for flood management in Scotland and maintain flood maps for public and development purposes. Looking at the map available, the Site does not fall in an area at risk to flooding.
- 1.12 From review of SBC’s online planning register, there are no previous planning applications relating to the subject site.
- 1.13 In terms of the servicing arrangements for the site, the Foul Drainage will be using the existing connections within the site and surface water drainage will be to soakaways.

Holiday accommodation at Burnmouth, Eyemouth

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## THE PROPOSAL

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2.1 This section sets out details of the proposed scheme which forms the subject of this planning application. The description of development is as follows:

***“The provision of three self-contained holiday accommodation together with associated parking and infrastructure.”***

2.2 The proposed holiday cabins are positioned along the northern border of the site, with access to the Site is from the south-east as illustrated on Figures 4 and 5. The Site layout allows for the adequate provision of 3 parking bays, one of which is an accessible parking bay to be on the entrance level to the site making the proposal accessible for all.

2.3 A level parking and turning area will be achieved by a cut and full method supplemented with necessary retaining wall structure. This will allow vehicles to leave the site in a forward gear.

2.4 The existing site access previously served the three fisherman cottages demolished in 1950 and subsequently served as informal vehicular parking for Burnmouth Parish Church for a number of years prior to the site coming into ownership of the applicant.

2.5 In terms of the design and materiality of the cabins, the cabins will have a discrete overall volume to ensure they do not impose on their surroundings, minimizing the landscape impact, sitting in well with the steep topography within the site.

2.6 The cabins will be supported by structural stilts, creating a small under croft which will be concealed by a timber hit and miss louvre screen.

2.7 The cabins are proposed to be built in quality and sustainably sources materials, in keeping with the local character of the area. Windows and accessories such gutters will be gun metal grey. The cladding will be painted a dark green, enabling the cabins to blend into and sit quietly on the hillside as illustrated on Figure 4.

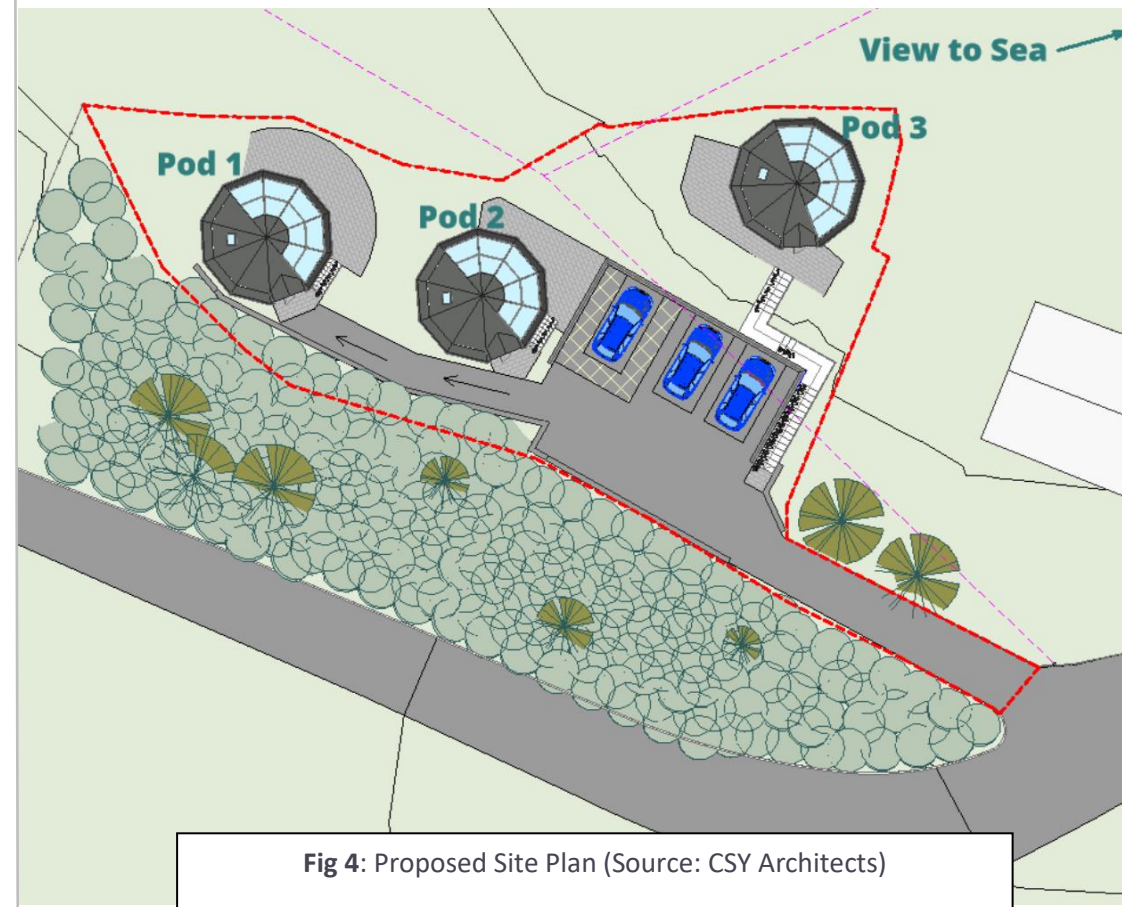


Fig 4: Proposed Site Plan (Source: CSY Architects)





**Fig 5:** Proposed Cabins Visualisation (Source: CSY Architects)

Holiday accommodation at Burnmouth, Eyemouth

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## PLANNING POLICY

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- 3.1 This section provides an overview of key planning policies relevant to the proposed development.

### **Scottish Borders Local Development Plan**

- 3.2 The Scottish Borders Local Development Plan (LDP) was adopted in 2016 and represents the most up to date development plan, containing planning policy against which applications are assessed by the Planning Authority.

#### *Policy ED7- Business, Tourism and Leisure Development in the Countryside*

- 3.3 The key policy under which the proposal must be assessed in the Scottish Borders Local Development Plan (2016) is Policy ED7 'Business, Tourism and Leisure Development in the Countryside'. The policy encourages rural diversification initiatives that is to be used directly for tourism appropriate to a countryside location whilst respecting the amenity and character of the surrounding area.
- 3.4 The policy states there must be no significant adverse impact on nearby residential dwellings. Where a new building is proposed, the policy seeks the requirement of evidence stating there is no appropriate existing building or brownfield site available. Where conversion of an existing building of architectural merit is proposed, evidence that the building is capable of conversion without substantial demolition and rebuilding will be required.
- 3.5 The policy requires applications to be accompanied with a business case that supports the proposals coming forward.

#### *Policy PMD2- Quality Standards*

- 3.6 Policy PMD2 seeks all new developments to be of a high quality in accordance with sustainability principles, designed to fit in with the Scottish Borders townscape and to integrate with its landscape surroundings.

#### *Policy HD3- Protection of Residential Amenity*

- 3.7 LDP Policy HD3 seeks to protect the residential amenity of the existing residential area. Proposals will be assessed against the following:
- The principle of the development, including where relevant, any open space that would be lost; and
  - The details of the development itself particularly in terms of scale, form and type of development in terms of its fit within a residential area.
  - The impact of the proposed development on the existing and surrounding properties particularly in terms of overlooking, loss of privacy and sun lighting provisions. These considerations apply especially in relation to garden ground or back land development.
  - The generation of traffic or noise
  - The level of visual impact.

#### *LDP Policy IS7- Parking Provision and Standards*

- 3.8 LDP Policy IS7 seeks proposals to provide car and cycle parking in accordance with approved standards. relaxation of technical standards will be considered where appropriate due to the nature of the development and if positive amenity gains can be demonstrated that do not compromise road safety.

### Material Considerations

3.9 Other material considerations include SPP, SESplan, The Scottish Borders Tourism and Strategy Action Plan, Placemaking and Design SPG, and the Draft NPF4.

#### SPP

3.10 The SPP provides policy information with regards to promoting rural development (linked to tourism and leisure) and supporting business and employment with key paragraphs mentioned below.

3.11 The SPP states the planning system should:

- In all rural areas promote a pattern of development that is appropriate to the character of the rural area and the challenges it faces; and
- Encourage rural development that supports prosperous and sustainable communities and businesses whilst protecting and enhancing environmental quality

3.12 It then goes on to state:

- promote business and industrial development that increases economic activity while safeguarding and enhancing the natural and built environments as national assets;
- allocate sites that meet the diverse needs of the different sectors and sizes of business which are important to the plan area in a way which is flexible enough to accommodate changing circumstances and allow the realisation of new opportunities; and
- give due weight to net economic benefit of proposed development

3.13 The plan states that planning authorities should consider the potential to promote opportunities for tourism and recreation facilities in their development plans.

#### SESPlan (Strategic Development Plan)

3.14 The region is within one of the four Strategic Development Areas (SDAs) outlined in SESPlan.

3.15 It states that the Scottish Borders faces a challenging future with the continued erosion of its employment base in farming and there is a continued challenge to improve the area's connectivity.

3.16 The aim of the SDP is to support the continued economic growth of the area since it is of key importance to delivering the overall SDP strategy. The quality of the natural and built environment is one of the key assets of the Scottish Borders and an opportunity to help achieve this strategy.

3.17 The SESPlan states The East Coast's high quality built and natural environment and abundance of leisure and tourism opportunities attracts many visitors and places it in high demand as somewhere to live.

#### Scottish Borders Tourism and Strategy Action Plan

3.18 The vision of the Scottish Borders Tourism and Strategy is:

3.19 "To grow tourism visits and spend in The Scottish Borders, through positioning and promotion as, a sustainable, year-round destination, which capitalises on its unique geography, heritage, natural environment and people"

3.20 A key aim is to encourage responsible custodianship of the region's built and natural environment, scenic and wildlife assets by supporting government, local government, agencies, landowners and managers to manage and protect the region's landscape and wildlife assets in a manner that maintains and improves the qualities

3.21 Furthermore, it aims to maximise the opportunities to be gained from raising and improving destination profile, awareness, market penetration, and economic benefit using events as a vehicle for change.

3.22 With regards to accommodation, it aims to ensure the regions accommodation offerings are in direct relation to consumer demands and where opportunities are available can act as an attractor of demand in themselves.

#### **Place Making and Design SPG**

3.23 A final key consideration for this proposal is the Supplementary Planning Guidance (SPG) Place Making and Design (2010).

3.24 This provides guidance on the importance of achieving well designed places which can improve the social, economic and environmental well-being of our communities.

3.25 It sets out the key sustainable placemaking objectives that any new development in the Scottish Borders should strive to achieve.

3.26 The key place making and design principles include siting of development, built character, infrastructure and access, views, sustainable development, energy efficient design, materials and the scale, massing and form, amongst others.

#### **Draft NPF4**

3.27 The Draft NPD4 was published in November 2021 and with the consultation ending in March 2022. The draft policy states:

**“We want our places to inspire people to visit Scotland, and to support sustainable tourism which benefits local people and is consistent with our net zero and nature commitments.”**

F E R G U S O N  
P L A N N I N G

Holiday accommodation at Burnmouth, Eyemouth

PLANNING ASSESSMENT

## PLANNING ASSESSMENT

4.1 This section of the statement sets out the key planning considerations arising from the proposal. It provides a reasoned justification for the development in the context of the adopted Local Development Plan and other relevant planning policy. It should be read together with the wider planning application package reports and drawings.

### Principle of Development

4.2 The proposal represents a tourism and leisure use, encouraged by Policy ED7. The nature of the proposal has an inherent requirement for a coastline location. The ethos is to enable that 'getting away from it all' experience in a truly unique setting, contributing to the tourist accommodation the Scottish Borders has to offer.

4.3 The site is a brownfield site following the demolition of the fisherman cottages in 1950, which is supported by Policy ED7, encouraging brownfield sites to be redeveloped as opposed to greenfield plots.

4.4 The site is not within the curtilage of the listed asset of Burnmouth Harbour which is approximately 0.2 miles to the south of the site. The nearest residential property is beyond the site boundary to the south. As the plot is well screened by the existing landscaping adjoining the boundary, it is considered the proposal will not impinge upon the setting of the Harbour, complying with policy EP7 nor result in impact the residential amenity in accordance with HD3.

### Design

4.5 In accordance with Policy PMD2, the proposal will protect, promote and enhance the green network through not extending onto green field land and can satisfactorily be accommodated on site. We feel that the proposed scale, massing, height and density are appropriate to the surrounding landscape.

4.6 Furthermore, careful consideration in the positioning of the cabins within the site has been taken to minimise the visual impact from the road to the south with the retention of the existing landscape buffer adjoining the site.

4.7 Each Holiday Cabin is positioned to achieve optimal views of the sea and surrounding vista whilst not having glazing facing each other or overlooking habited sites, enhancing privacy for the cabin users and neighboring sites.

4.8 Due to substantial separation distances and existing screening, the proposed development is considered to have no residential amenity impacts, complying with Policy HD3 Residential Amenity.

4.9 The Strategic Development Plan outlines that the quality of the natural environment is one of the key assets of the Scottish Borders. We feel that this proposal will not adversely affect the key assets but instead enhance the use of it.

4.10 The Cabin Pods 1 and 2, towards the west of the site have patios at the lower level, fitting into the steep topography, reducing the scale of ground retention and undercroft required.

### Transport and Access

4.11 The existing site access is to be retained and upgraded to comply with the Scottish Borders Council Roads Planning and Policy IS7.

4.12 As mentioned previously, the site layout allows for the provision of three parking bays, one of which is an accessible parking bay to be on the entrance level to the site to ensure the site is accessibly by all.

### **Economy and Tourism**

- 4.9 It is important to note that this proposal is for holiday accommodation only, as you can see from the plans the cabins are not suited for residential purpose, addressing the need of the SESPlan and Draft NPF4.
- 4.10 A business case has also been submitted under private cover as part of this application and emphasises the vision of attracting more visitors to the wider area within the Scottish Borders, promoting the use of local businesses, events and leisure activities.
- 4.11 The construction and operation would bring significant employment to the area, with the applicant seeking to appoint local tradesmen during the construction process. Visitors to the proposed cabins will also provide knock on benefits, providing customers to local shops and cafes.
- 4.12 The proposal will help achieve the objectives of the Tourism and Strategy Action Plan and it can itself attract and improve visitor numbers to the Scottish Borders.
- 4.13 Additional information can be found in the accompanying Business plan prepared by ASE Holiday and Property Rentals Ltd.

### **Visual Impact and Residential Amenity**

- 4.14 As previously discussed, the proposals are situated within a located that are not within close proximity to existing residential properties, supported by Policy HD3.
- 4.15 The site is largely hidden within the topography and through the existing landscaping buffer between the road adjoining the south of the site. Through careful design and segregated location of the proposed holiday accommodation, it is deemed there will be no adverse impact on the neighboring residential amenity.



Holiday accommodation at Burnmouth, Eyemouth

## CONCLUSION

## CONCLUSION

- 5.1 Planning Permission for the development of self-contained holiday accommodation units in the form of three Cabins together with associated infrastructure on the site is considered acceptable when viewed against appropriate planning policy.
- 5.2 The proposal is situated within a unique location with no significant detrimental impact upon the landscape or residential amenity. The proposal seeks to maintain a safeguard the future of the heritage assets within Burnmouth, in accordance with LDP Policy EP7. The construction methods will be minimal and sympathetic with the design made to fit within the rural and coastal context.
- 5.3 The proposal provides an opportunity to utilise this unique brown field site for a growing demand in tourism accommodation which is supported by LDP Policy ED7 where holiday makers will be able to explore the wider area and what the Scottish Borders has to offer whilst contributing to the local economy.
- 5.4 The Planning Authority is respectfully requested to approve this application which will enable the enjoyment of this unique site through opening it up to holiday makers, providing long term sustainable active use that will enhance the local economy.



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