

LAND WEST OF GREENBURN COTTAGE, AUCHENCROW 22/01666/PPP and 23/00004/RREF

RESPONSE TO LOCAL REVIEW BODY REQUEST FOR FURTHER INFORMATION – COMMENTS ON THE IMPACT OF NATIONAL PLANNING FRAMEWORK 4 ON THE PLANNING APPLICATION AND SUBSEQUENT REVIEW

The relevant policies from NPF4 are noted below, with officer commentary on their relevance, and a conclusion below. **Response: The appellant responses to each comment and section are highlighted in red, below.**

Relevant NPF policy	Commentary
<p>Policy 1: Tackling the climate and nature crises</p>	<p>This policy requires significant weight to be given to the global climate and nature crises when considering all development proposals.</p> <p>Annex A of NPF4 advises that the document should be read as a whole. When considering the principle of rural housing proposals such as this, this policy should therefore be considered alongside such policies as 2 (Climate mitigation and adaption), 5 (Soils), 16 (Quality homes) and 17 (Rural housing). The policy is a material consideration that must be weighed in the overall planning balance.</p> <p>Response:</p> <p>The proposed site is in a sustainable suburban location, within reasonable walking distance to Reston Town Centre, offering sustainable access to extensive bus routes, rail station, school, shops, services and leisure facilities</p> <p>The future proofing of homes for climate change will be agreed during the detailed planning application stage and will include renewable technologies.</p>
<p>Policy 2: Climate mitigation and adaption</p>	<p>Criterion a) requires development proposals to be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible.</p> <p>The proposed site is not well served by public transport and besides one pub/ restaurant is not within walking distance of shops and services. The siting of the development would therefore result in four car dependent residences. The proposal is not supported by this policy. This does not amount to a reason to refuse the application but is a material consideration that must be weighed in the overall planning balance.</p> <p>Response:</p> <p>We disagree with this assertion; the proposed site is in a sustainable suburban location, within reasonable walking distance to Reston Town Centre, offering sustainable access to extensive bus routes, rail station, school, shops, services and leisure facilities.</p>
<p>Policy 3: Biodiversity</p>	<p>This requires, at parts (a) and (c) that all developments contribute to biodiversity enhancement. It is likely this could be satisfied by the agreement of a biodiversity enhancement scheme via planning condition.</p> <p>Response:</p>

	No further comment
Policy 5: Soils	<p>Criterion a) is potentially relevant to all developments, whilst b) relates to sites such as this which are recorded as Prime Quality Agricultural Land (PQAL) by the James Hutton Institute. The policy states that proposals resulting in the loss of PQAL will only be supported in specific circumstances. None of these apply, therefore the proposal is contrary to this policy.</p> <p>Response:</p> <p>The land is not recorded as PQAL, therefore this criterion does not apply. In the event that it did, the amount of land in question is very small in size in relation to agricultural scale.</p>
Policy 7: Historic assets and places	<p>This covers a range of heritage considerations including archaeology. As noted in the report of handling, issues in relation to archaeological interests could be addressed by condition and would not affect the outcome of the application.</p> <p>Response:</p> <p>No further comment</p>
Policy 9: Brownfield, vacant and derelict land and empty buildings	<p>This policy intends to promote the reuse of brownfield, vacant and derelict land and to reduce the need for greenfield development. It also concerns contaminated land.</p> <p>The application site comprises arable farmland. There is no visible sign of previous development within the site. There is thought to have been buildings on the site in the 19th century however the site has long since naturalised. Response: The building referred to can still be seen within the site.</p> <p>There are potential land contamination issues on the site though this has not been established conclusively. Such matters could be dealt with by planning condition. Response: No further comment</p> <p>Overall, the effect of this policy is considered to be neutral in this instance.</p>
Policy 14: Design, quality and place	<p>This requires that developments improve the quality of an area in their design impacts, and that they meet the six qualities of successful places. Whilst relevant in general terms, this policy is less relevant for an application for planning permission in principle, though the issues raised within the 'placemaking' section of the original report of handling are of general relevance.</p>
Policy 16: Quality Homes	<p>This policy sets out the circumstances where new housing developments may be supported. Of particular relevance to this proposal is criterion f) which sets out the criteria for new homes on sites such as this which are not allocated for housing in the Local Development Plan. None of the criteria - including, for the reasons set out below, criterion iii., - are considered to apply.</p>

<p>Policy 17: Rural homes</p>	<p>Criterion a) of this policy sets out circumstances where NPF4 offers support for new rural homes. None are considered to apply in this instance:</p> <ul style="list-style-type: none"> I. The site is not allocated for housing in the LDP. The development does not reuse brownfield land where a return to a natural state has not or will not happen without intervention. Whilst the site is thought to have been developed in the 19th century the site has long since been naturalised and is now arable farmland unrecognisable as having previously been developed. Response: The building referred to can still be seen within the site. Whilst it would not be reasonable to suggest that the site as a whole is brownfield, it is in part. II. The development does not reuse a redundant or unused building. Response: As above. III. Nor does it use a historic environment asset. Response: The building within the site is of historical significance, albeit not recorded as such. IV. The dwellinghouse is not required to support a rural business. Response: As set out in the appeal statement, the dwellinghouses as proposed would help to ensure the sustainability of this important local business by providing at least some regular cashflow whilst also providing much needed, low-cost family housing in the area V. Nor is it for a retiring farmer. Response: It has not been put forward as yet, but this is a possibility. VI. It would not subdivide an existing dwelling. VII. Nor is there any evidence it would reinstate or replace a former dwellinghouse on the site. Response: The building referred to can still be seen within the site, so whilst it would not be reinstated it would not be unreasonable to state that it is being replaced. <p>Criterion b) and d) do not offer support for the proposed development. Response: On the contrary, there is support in at least 5 of the 7 criteria as set out.</p>
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	<p>Criterion c) relates to remote rural areas as defined by the government's Urban Rural Classification data. The site is not defined as remote rural by this data.</p> <p>Finally, Policy 17 also directs LDPs to set out tailored approaches to rural housing. In the Scottish Borders, the Council's Local Development Plan 2016 policy HD2-A (Building Groups) provides a well-established, locally tailored basis by which to consider rural housing proposals. For the reasons outlined in the report of handling and in the reason for refusal, the proposed development was deemed to be contrary to this policy. This position is unchanged.</p> <p>Response: The proposal represents a logical extension of the Building Group adjoining the existing built-up area, which has the capacity to accommodate six additional dwellings, of which this case proposes four, within this local plan period, in accordance with Policy HD2. The proposal is sympathetic to the character of the building group, positioned in a logical location and will have no detrimental impact upon</p>
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	the amenity of neighbouring residents, ensuring there are adequate separation distances between the existing properties resulting in no overlooking or loss of daylight/ sunlight
Policy 18: Infrastructure first	This requires that impacts on infrastructure be mitigated. The glossary defines the meaning of infrastructure. It includes education. As noted in the Report of Handling, impacts to local education could be addressed by a legal agreement. Response: No further comment
Policy 23: Health and safety	This policy concerns a broad range of issues including health, air quality and noise. There is no known conflict with this policy. Response: No further comment

Conclusion

The principle of the proposed development is not supported by NPF4 since rural housing in the countryside requires compliance with criteria in Policy 17 which this proposed development does not meet. NPF4 therefore reinforces the reason for refusal.

Moreover, NPF4 policies 1, 2 and 5 place greater weight upon the climate crisis and lifecycle greenhouse gas emissions and do not support development such as this which would result in car dependent residences and the loss of prime agricultural land. These provisions strengthen the decision to refuse the application.

Response:

The case officer has referred to 11 policies that are applicable from the new NPF4. From those 11 policies, they are of the view that there are only conflicts with the proposal and 3 of these policies, namely policies 2 (Climate mitigation and adaption), 5 (Soils) and 17 (Rural Homes). Our responses on those individual policies are set out above in correlation with the officer's comments, but we would also emphasise the following:

- The proposal represents a logical extension of the Building Group adjoining the existing built-up area, which has the capacity to accommodate six additional dwellings, of which this case proposes four, within this local plan period, in accordance with Policy HD2.
- The proposal is sympathetic to the character of the building group, positioned in a logical location and will have no detrimental impact upon the amenity of neighbouring residents, ensuring there are adequate separation distances between the existing properties resulting in no overlooking or loss of daylight/ sunlight.
- The proposal accords with at least 5 of the 7 criteria set out in policy 17 of the NPF4
- The site is primarily visible from the adopted road to the south of the site upon approach from the west, noting the visibility will be restricted due to the low-lying topography in which the site lies and the existing neighbouring dwelling shielding the plot. In addition, the existing and proposed landscaping along the western and southern boundaries, further enhancing the aesthetics, screening views from all approaches. Overall, the

visual impact of the proposal on the local area is considered to be minimal.

- The dwellinghouses as proposed would help to ensure the sustainability of this important local business by providing at least some regular cashflow whilst also providing much needed, low-cost family housing in the area.
- The proposal will provide high-quality family-sized dwellings within this desirable and sustainable location, within reasonable walking distance to Reston Town Centre which benefits from a school, shops, cafes, bus services, rail station and other local services, supported by the Draft NPF 20-minute neighbourhood.
- The proposal will utilise sustainable renewable technologies.
- The proposal will assist in meeting the strong demand for homes within the desirable immediate area and wider Eyemouth vicinity.
- There are no road safety concerns or objections from the Roads Officer or any other consultee.