



*Community Council
of the
Royal Burgh of Peebles & District*

Ranald Dods
Planning and Regulatory Services
Scottish Borders Council
Newtown St. Boswells
Melrose, TD6 0SA
By email: DC Consultees
cc: Raffaella Diesel, SBC ecologist
cc: Jeanette Hall, NatureScot Woodland Advisor

17 August 2026

Dear Mr Dods,

**OBJECTION – [24/00247/FUL](#) – New material consideration
NatureScot advise Kingsmeadows is Ancient Woodland**

We write to advise you of a **new material consideration** that has just arisen. On 10 Aug 2026 we received confirmation from NatureScot's Woodland Advisor, Jeanette Hall, that the **woodland at Kingsmeadows should be treated as ancient**:

From: Jeanette Hall <...>
Subject: RE: Kingsmeadows woodland
Date: 10 August 2026 at 14:27:38 BST
To: Michael Marshall <...>
Cc: ... <...>, ... <...>

Hello Michael, thanks for those links.

I can confirm that this woodland should be treated as ancient, based on its presence on the historic maps. Only the Roy and 1st edition maps were used to compile the AWI because they were available, and covered the whole country, but local maps, such as the 1823 John Wood map are useful supporting evidence where they exist. In this case, the map provides evidence that the woodland was mature well before the survey for the OS 1st edition took place. The data you have on ancient woodland indicator species provides additional evidence of the quality of the woodland.

I've attached a longer version of the guidance available on our website. This was felt to be too long for our webpage, but provides additional information. Possibly of particular value to you are the sections on:

- limitations of maps (4.1.1), which sets out why the absence of woodland from the Roy maps is not evidence that they didn't exist at the time.
- The provisionality of the AWI (4.2) and, in particular, its incompleteness in the Borders.

Best wishes

Jeanette

Jeanette Hall | Woodland Advisor

NatureScot | Great Glen House, Leachkin Road, Inverness, IV3 8NW | ...

Scotland's Nature Agency | Buidheann Nàdair na h-Alba

NatureScot's view – Kingsmeadows is Ancient Woodland

Ms Hall is NatureScot's expert on Ancient Woodland in the UK¹. She is the author of NatureScot's detailed guidance, which is NatureScot's detailed policy on Ancient Woodland². NatureScot's online summary of that detailed guidance, [Summary and Policy Statement on Ancient Woodland](#), "is intended for developers, **planners**, foresters, ecologists and others who need to use the AWI³") and makes NatureScot's policy clear:

"Woods not shown on the AWI, but present on the historic maps, are likely to be ancient and **should be treated as such** unless evidence is available to the contrary. ... The AWI ... is not definitive and should be used with care."

This is exactly the situation at Kingsmeadows, NatureScot advises (see email above). Kingsmeadows woodland meets NatureScot's definition of Ancient Woodland (despite not being listed on the AWI) and is to be treated as Ancient Woodland.

Evidence Kingsmeadows is Ancient Woodland

The woodlands at Kingsmeadows (within the application site and the surrounding policies) are shown as being heavily wooded on the relevant historic maps⁴ and are thus Ancient.

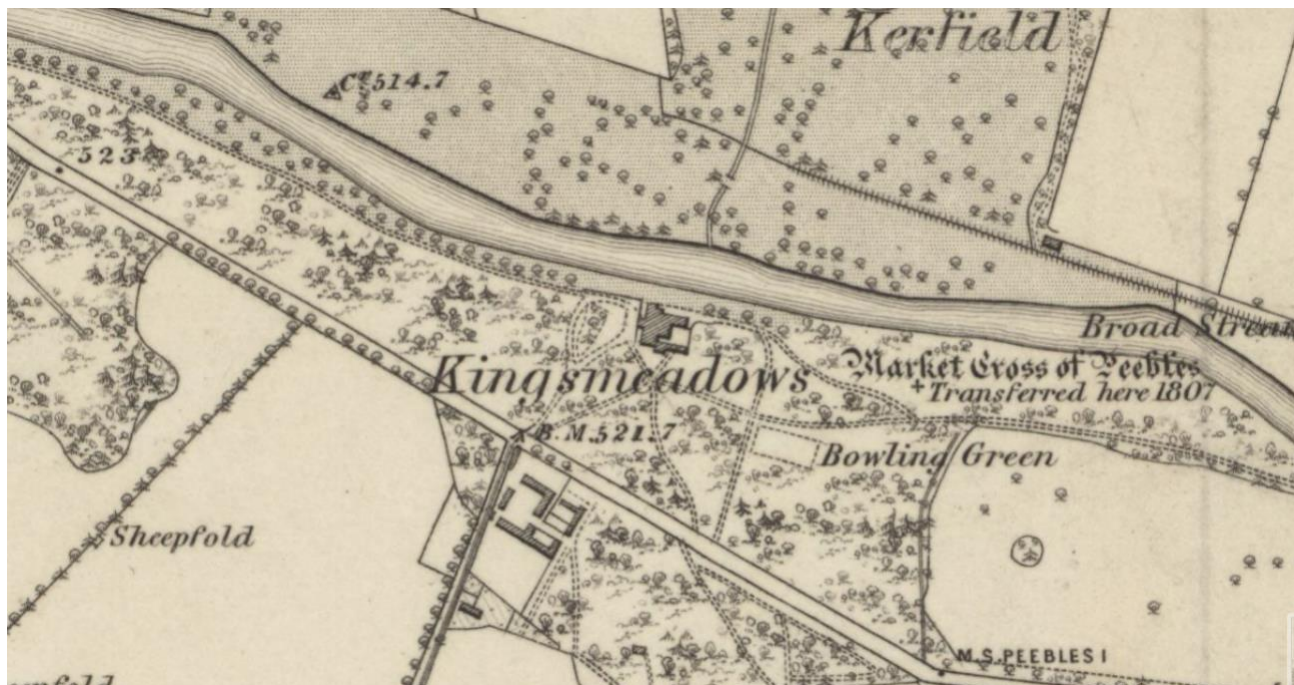


Fig 1: The [first \(1856\) OS Map for Peebles](#) shows Kingsmeadows heavily wooded throughout the entire estate (including the application site). On this evidence alone, the woodland is, by NatureScot's definition, Ancient.

¹ [Her research](#) is much cited, e.g. "The ancient woodland concept as a practical conservation tool in Great Britain", *Journal for Nature Conservation*, Vol 15, Iss 2, 13 July 2007, doi [10.1016/j.jnc.2007.04.001](https://doi.org/10.1016/j.jnc.2007.04.001)

² "A guide to understanding the Scottish Ancient Woodland Inventory (AWI)", Jeanette Elisabeth Hall, NatureScot, April 2016, available <https://doi.org/10.13140/RG.2.1.1622.6163>

³ Ancient Woodland Inventory

⁴ Reproduced with the permission of the National Library of Scotland. Avail [NLS Map Images website](#).



Fig 2: The [1823 John Wood Map](#) also shows Kingsmeadows heavily wooded throughout the entire estate (including the site for this application). As NatureScot explains, “the map provides evidence that the woodland was mature well before the survey for the OS 1st edition took place”.

Other nearby Ancient Woodlands (such as Janet’s Brae) that are listed on the AWI are, like Kingsmeadows, not shown as woodland on the Roy Maps. NatureScot’s guidance explains “Records of LEPO [long established woodlands] ... are very incomplete in the Borders.”

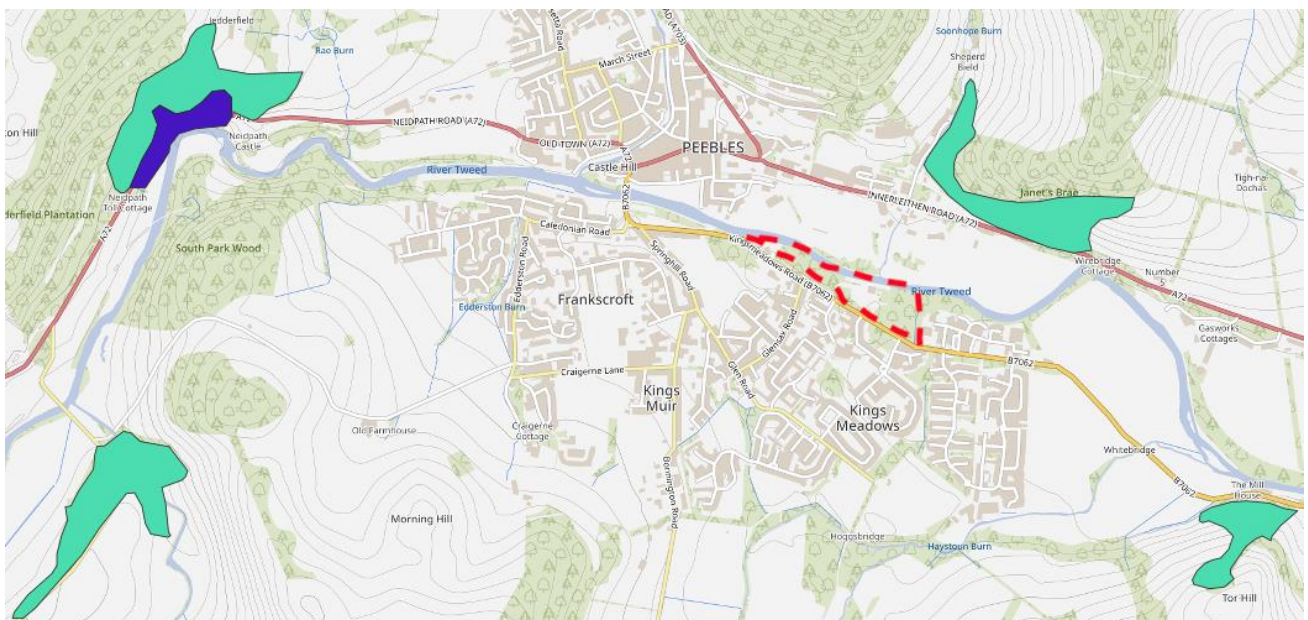


Fig 3: AWI map showing approximate location of Kingsmeadows in relation to nearby woodlands on the AWI such as Janet’s Brae. © Scottish Natural Heritage Contains Ordnance Survey data © Crown copyright and database right (2026)

As NatureScot explains, “The data you have on ancient woodland indicator species provides additional evidence of the quality of the woodland.” For example, see the [16 species of Ancient Woodland indicator plants](#) recorded in the woodland and data from the National Biodiversity Network (exhibit NBN1 from our [objection dated 27 Dec 2025](#)).

Astonishingly, Granton’s applications fail to identify the site as Ancient Woodland.

Nor does Granton provide any evidence to the contrary. NatureScot’s new evidence shows that Mr Pritchett’s claim that “2.18 the trees on the site are not ancient woodland” is false.

NPF4 Policy 6 prohibits Ancient Woodland loss or adverse impact

NPF4 was not in force when expired planning permission 19/00182/PPP was granted. NPF4 Policy 6 is a major strengthening of policy over the prior statutory development plan:

- “b) Development proposals **will not be supported** where they will result in:
- Any loss of ancient woodlands**, ancient and veteran trees, **or adverse impact on their ecological condition;**”

This is a two-part prohibition, firstly on any loss of Ancient Woodlands and secondly on any adverse impacts on their ecological condition. Recognising that it is impossible to mitigate the loss of, or adverse ecological impact on, Ancient Woodland, this policy does not allow exceptions to be made on the basis of mitigation measures.

Thanks to NatureScot’s recent advice, we now know (but did not know previously) that approval on the proposed location, immediately to the East of Kingsmeadows House, would necessitate the loss of **a substantial amount of Ancient Woodland**.

We also know from the planning history (but did not know when 19/00182/PPP was granted) that if this application in principle were granted, then the detailed permission (AMSC) to follow would necessarily involve a **substantial adverse impact on the ecological condition of the wider woodland**. We know this from the applicant himself, who submitted expert reports in support of his 2022 AMSC application saying

“Inevitably, 46no trees are to be removed to accommodate the build.”
[Estate Management Plan, DWA Architects Ltd, Feb 2022.]

Ancient Woodland status adds significant weight to recent refusals of related S.42 applications 24/00030/FUL and 24/00031/FUL

The two grounds on which this application seeks new permission have already been considered separately in applications 24/00030/FUL and 24/00031/FUL. Those applications were refused because of their impact on the woodland. The applicant was unsuccessful in his appeals and these refusals are final.

Application	Refusal reasons include
24/00030/FUL (condition 2) 9 Dec 2024	“The application is contrary to Policy 6 of National Planning Framework 4 in that the development would result in the loss of ancient woodland and cause ecological impact on trees of historical value.”
24/00031/FUL (condition 7) 23 Feb 2026	“Would have an adverse impact on the woodland setting of Kingsmeadows House and would, in turn, be detrimental to the character and appearance of the conservation area and the setting of the category B listed building. The development would be contrary to policies 6 and 7 of National Planning Framework 4.”

Now that NatureScot’s position is clear that the site is Ancient Woodland, these refusal reasons take on much weightier material significance. Both refusals can now be understood in the technical sense of Ancient Woodland (as defined by NatureScot) and specific breaches in respect of the loss or adverse ecological impact on Ancient Woodland.

The permission sought to be renewed understated woodland impact

15/00822/PPP established the principle of flats & entrance road under 2011 LDP, without consulting SBC's tree officer or SBC ecologist. Site not identified as Ancient Woodland. **Flats** 34 trees (3102–3135) to be felled. **Woods** "mature trees to the east" protected. **Road** "utilise the existing roadway and footpath, as this will have minimal impact."

19/00182/PPP renewed permission without revisiting principle, with tree survey for different site and without consulting SBC's tree officer. Site not identified as Ancient Woodland. **Flats, Woods & Road** no trees identified for felling. **AIA & AMS**⁵ missing.

Detailed application 22/00422/AMC reveals true impact on woodland

2022 "Inevitably, 46no trees are to be removed to accommodate the build" [applicant].
Road 10 significant trees to be felled, some on Ancient Tree Inventory (ATI).
Woods concerns incursion into root protection areas means further loss of trees.

We know the site is Ancient Woodland. New planning policy prohibits its loss. The principle of development must be re-examined and permission refused.

NatureScot's new advice that the site itself is Ancient Woodland is a compelling reason to revisit the principle of this development involving so much tree and woodland loss:

- The 2015 and 2019 PPP applications understated the impact on the woodland.
- The 2022 detailed application revealed much greater impact on trees and ecology.
- NatureScot have just advised that the site and surrounds are Ancient Woodland.
- Planning policy has materially changed to prohibit any loss of Ancient Woodland.
- The principle of this development can, and we believe **must**, be re-examined – despite Mr Pritchett's claims to the contrary (see ch. 5 of our [30 Dec 2025 objection](#)).

We believe that a full and fair revisit of the principle of this development should consider:

- The loss of Ancient Woodland on the site.
- The adverse impact on the Ancient Woodland surrounding the site.
- Expert advice that many more trees will be lost than the applicant estimates.
- The 800 cumulative objections to building on, and loss of, this Ancient Woodland.
- The impact of the site's Ancient Woodland status on Habitats Regulations Appraisal.

Set against these weighty considerations, the applicant argues that he *must* be granted new permission because of a typo and because the protections afforded the Ancient Woodland were not relevant, necessary or reasonable. In our opinion, this is ludicrous.

We believe NatureScot's confirmation the site is Ancient Woodland adds significant weight to the arguments in our [30 Dec 2025 objection](#). We invite planners to deliver a swift refusal, in accordance with the planning committee's refusals of 24/00030/FUL and 24/00031/FUL.

Yours sincerely
Peebles & District Community Council
Michael Marshall, PhD, Planning Convener

⁵ Arboricultural Impact Assessment (AIA) should show the of impact of the proposal on trees and woodland. Arboricultural Method Statement (AMS) should explain how road will be constructed to preserve trees/woods.