

**Bell, Laura (Planning HQ)**

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**From:** [REDACTED] virgin.net>  
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**To:** localplan  
**Subject:** Objection to issues raised in the MIR  
**Attachments:** PCS Objection to the Scottish Borders Council Main Issues Report.docx

**Follow Up Flag:** Follow up  
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I attach the Peebles Civic Society objection to issues raised in the 2018 Main Issues Report.

[REDACTED] Secretary Peebles Civic Society.

## PEEBLES CIVIC SOCIETY OBJECTION TO ISSUES RAISED IN THE 2018 MAIN ISSUES REPORT

### Introduction.

We are concerned that the Main Issues Report does not address the current situation in Peebles and Eshiels. In the Main Issues Report no indication of the Long Term Plan future option for housing numbers in Peebles has been given. We have included the two sites at Eshiels as they are in the Community of Peebles. We are surprised at the choice of sites in Peebles especially the land west of Edderson Ridge and the land east of Cademuir Hill. We have calculated the number of houses in possible the Long Term Plan and we are surprised and are concerned at the amount of houses resulting from the calculation. The number of houses resulting from our calculations goes against the following SESPlan and the current LDP statements:

The current SESPlan states:

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'***

The current LDP states:

The adopted LDP in section 3.22 states: ***The Plan identifies housing allocations to serve the whole of the Western SDA and seeks to spread that development beyond Peebles into the other main settlements in Tweeddale. This is intended to achieve a greater social cohesion and manage pressure on key services and facilities.***

The MIR states in the Section 2 the Changing Context for the Local Development Plan:

2.24 The development plan process seeks to ensure the right development takes place in the right place. The Scottish Borders is an attractive place to live and work and the Council must continue to strike the balance between supporting sustainable economic growth and protecting the landscape and environment. The Council places a very strong emphasis on placemaking and design principles when assessing new development proposals.

The MIR states in the Section 3 Spatial Strategy:

3.10 The Central Borders RGA focuses around the main towns of Galashiels, Melrose, Earlston, Kelso, Jedburgh, Hawick and Selkirk. This area has the largest population within the Scottish Borders **and is the primary area for future growth**. It is at the centre of the roads transportation network and is also served by the Borders Railway and the Galashiels Transport Interchange.

3.11 The Central Borders RGA is supported by the Berwickshire and Western Growth Areas which **perform secondary roles within the spatial strategy**. This recognises their hinterlands within the context of the large dispersed area of the Scottish Borders.

The MIR states in Section 5 Planning for Housing States:

5.7 Whilst the Western Area has a considerable amount of undeveloped allocated housing land it should be noted that much of this is within Innerleithen and Walkerburn which have more limited housing market interest. **Historically Peebles has a vibrant market for housing development and the development industry will continue to seek further land in this area to meet demand**

5.12 Given the established housing land supply in the LDP, low completion rates and low housing land requirement within the proposed SESPlan, it is anticipated that the LDP2 is unlikely to require a significant number of new housing allocations. However, as the SESPlan housing land requirement has yet to be agreed by Scottish Ministers following consideration of the findings at Examination by the Directorate for Planning and Environmental Appeals, the finalised housing land requirement is unknown at this stage. Consequently the MIR identifies more options than is anticipated to be required in order to allow flexibility should the housing land requirement be increased by Ministers.

Comparing the adjacent Locality Area (the area supported by the new railway) – The Eildon Area that contains some of the towns on the list of the Central Borders RGA to the Tweeddale Area in Section 5 Planning For Housing we note that the table for the Eildon Locality including Galashiels, Melrose and Selkirk under the Preferred Option lists 2.9 Ha providing 40 houses compared with the Tweeddale Locality Preferred Option lists 41.2 Ha the number of houses we calculate at some 450.

Moreover the M.I.R. lists sites in Section 4 Growing Our Economy mixed use lists the two Eshiels sites, the Cardrona site and SPEEB008 Land West of Edderston Ridge in Peebles. No reference of these sites is given in the Section 5. Planning For Housing. We have included these sites in our calculations.

**We feel that Peebles is suffering heavily from this potential over development calculated below:**

**1.1 We list the proposed future housing numbers in Peebles and Eshiels thus:**

**1.2 2016 Local Development Plan new housing sites. Adopted 17 December 2016 with adjustments resulting from the Supplementary Planning Guidance thus:**

Southparks	APEEB021	50	
Violet Bank II	APEEB04	25	Completed
Rosetta Road	APEEB044	100	.

Redevelopment: Tweedbridge Court RPEEB003 50 Replacing the housing on the site.

Total number of new housing sites listed in the current LDP is 225.

**1.3 The current Local Plan 2016 lists the following sites in the Long Term Option that have no planning applications yet:**

We have calculated the amount of housing based on the LDP number of 50 for the site APEEB021 Housing South of South Park thus: Site area: 2.4Ha at 50 amounting to 20.8 per Ha and adjusting for the individual site conditions:

SPEEB003 South West of Whitehaugh Site size 4.5Ha Indicative Site Capacity: To Be Calculated.

Site accommodation LDP using Southparks @ 20.8 per Ha = 94 But due to the sloping site we have reduced this to 40.

SPEEB004 North West of Hogsbridge Site size 2.9Ha Indicative Site Capacity To Be Calculated.

Site accommodation LDP using Southparks @ 20.8 per Ha and the fact that the site plan shows about half the site Green thus we have reduced the site area to 1.5Ha, the development is 30.

Adding these two sites the total is 70.

**1.4 We are concerned about the addition of the ‘Windfall’ sites after the creation of the 2016 LDP. The “windfall” sites should only be limited to sites of 20 houses otherwise the LDP is distorted. See the total of “windfall” sites below.**

Peebles Hydro	31	completed windfall site
Kingsmeadows House	12	completed windfall site
Kingsmeadows House II	10	proposed windfall site
March Street Mill site	69	proposed windfall site Planning application 17/00064/CON and 17/00063/PPP.

Kittlegairy 2 Land east of 10 Kittlegairy Avenue. 17/00606/PPP 216 houses proposed windfall site. (The developers would consider this a ‘windfall’ site but 216 is a too large amount to be considered on the ‘windfall’ list and the site currently agricultural field and not a ‘brown’ reused site. It does not appear in the current LDP as a Future Site.)

Thus the total number of ‘windfall Sites’ amounts to 338 bearing in mind that the current LDP plans to build only 225 houses.

**1.5 Current Planning Applications for Peebles:**

South Parks 18/01026/FUL Site APEEB021. The Planning Application from Persimmon Homes Ltd is to provide 71 homes exceeding the 50 units stated in the LDP.

Tweedbridge Court 18/01086/FUL Site RPEEB003. The owners have submitted a planning application for 40 flats.

March Street Mill 17/00063/PPP and 17/00064/CON 69 houses proposed.

Kittlegairy 2 Land east of 10 Kittlegairy Avenue. 17/00606/PPP The developers for have submitted an application in advance of it appearing in current the LDP for 216 houses.

Total housing proposed in the present planning applications: 396 compared to the new housing sites listed in the current LDP para 1.2 is 225.

**1.6 Main Issues Report 2018 lists five new sites, three for this Local Plan and two for Longer Term development:**

1 APEEB056 Land South of Chapelhill farm. Rosetta Road. Preferred option.

Area 7.0 Ha Listed Site Capacity 150. The Site Requirements list the preferred linkage route is between Kingsland Road and Dalatho Street thus adding to the Rosetta development for 100 houses thus bringing the total to 250 houses. Dalatho Crescent and Dalatho Street are narrow roads and the junctions to the Edinburgh Road are tight. Surely the ideal access to the A703 is to the north inside the boundary of APEEB056 forming a new road, bridge and a new junction to the A703 that will serve this site and the Rosetta development.

2. MESH1001 Land at Eshiels I

Area 19.4 Ha stated Site Capacity 200. Preferred option.

3. MESH1002 Land at Eshiels II

Area 6.7 Ha stated Site Capacity 40 Preferred option.

Sites MESH1001 and MESH1002 are adjoining on both sides of the side road leading to Eshiels amounting to 240 houses. These sites are in the open countryside and major development in this area will detract from the quality that the visitors value so much from visits to the Scottish Borders. They are also prime agricultural land and policy ED10 should apply.

4. SPEEB008 Land West of Ederston Ridge. Preferred Long Term Option. Indicative Site Capacity TBC Adjoining the Persimmons Homes site APEEB021.

This site is for mixed use. We will assume the site is in 2 portions: To the west of the Harbro site as Business and Industrial land and to the South of the Persimmons site as housing. The total area of the site is 19.5Ha.

Note that the land west of Harbro is approximately 2.5 times the area of the Persimmons Southpark housing site amounting to some 6 Ha and in addition there is a remaining plot in the Local Plan approximately the area of the Harbro site that is unused at present.

The land to the south of the Southparks Persimmons housing estate amounts to approximately 5 times the area of the Persimmons site amounting to 12Ha but allowing for landscape screening we suggest 4 times the area of the housing site amounting to 9.6 Ha. Thus the site capacity using the Southparks density in the LDP at 20.8 per Ha that amounts some 200. If the Persimmons development figures are taken then the total will be 288.

THE MAIN ISSUE HERE IS THE TRAFFIC ON THE NARROW CALEDONIAN ROAD THAT IS ALREADY PREDICTED TO BE BUSY WITH THE SOUTH PARKS AND TWEEDBRIDGE COURT DEVELOPMENTS. THE CALEDONIAN ROAD CANNOT POSSIBLY TAKE THE TRAFFIC THAT WOULD BE GENERATED BY 200 /288 ADDITIONAL HOUSES. FURTHERMORE IF THE SITE TO THE WEST OF HARBRO IS DEVELOPED FOR HOUSING IT WOULD AMOUNT TO SOME ADDITIONAL 150 HOUSES ALLOWING FOR THE WOODLAND PLANTING THEREFORE TOTALLING SOME 350 HOUSES.

The illustration in the Western Rural Growth Area: Development Options Study page 23 has road access to Ederston Road that joins with Caledonian Road. Craigerne Lane is a single track road leading to Bonnington Road.

This site is located on the edge of a National Scenic Area and is part of the Special Landscape Area. The scale of the proposed development would detract from and diminish these areas.

5. SPEEB009 East of Cademuir Hill. Preferred Long Term Option. The farm land as you go along Bonnington Road past the Water Treatment Plant. The site is in open fields to both sides for the road but it is a sloping site.

Area 13.2 Indicative Site Capacity TBC. We are using a reduced LDP figure for Southparks at 10 per Ha rather than 20.8 per Ha = 132.

THE MAIN ISSUE HERE IS THE TRAFFIC ON BONNINGTON ROAD THAT IS NARROW AND HAS SHARP BENDS AND TWO DIFFICULT JUNCTIONS AT THE SCHOOL LEADING TO SPRINGHILL ROAD THAT ALREADY HAS TOO MUCH TRAFFIC.

The illustration in the Western Rural Growth Area: Development Options Study page 24 has further sites for housing development amounting we estimate to some **400 additional houses** based on the Southparks site density at 20.8 per Ha. Including SPEEB009 at 132 the total of this site amounts to 532 houses.

The field with the underground pipeline is excluded from their proposal but we think the developers will develop parts of the fields adding to the numbers of houses.

WE ARE CONCERNED AT VIABILITY OF THE FARM IN THE FUTURE WITH THIS PROPOSAL TO DEVELOP THE FIELDS ON BONNINGTON ROAD IN SPEEB009 AND THE FURTHER PROPOSED DEVELOPMENT OF THE FIELDS TO THE SOUTH AS STATED IN THE WESTERN RURAL GROWTH AREA OPTIONS STUDY. THE PROPOSALS GO AGAINST POLICY ED10 (PROTECTION OF PRIME QUALITY AGRICULTURAL LAND).

This site is in a Special Landscape Area and the proposed development would be damaging this site considerably.

#### 4 Totalling the Main Issues Report calculated suggestions:

APEEB056 Land South of Chapelhill farm.	LDP2	150
MESH1001 Land at Eshiels I	LDP2	200
MESHIE002 Land at Eshiels II	LDP2	40
Total proposed in the LDP2		390

In addition using the listed Future Sites in the current Local Plan that we have calculated in 1.3:

SPEEB003 South West of Whitehaugh	40
SPEEB004 North West of Hogsbridge	30

And the Long Term Future sites that we have calculated in 1.6:

SPEEB008 Land West of Edderston Ridge	200
SPEEB009 East of Cademuir Hill.	132
Grand Total	792

**1.7 Adding the current planning applications figure of 396 in paragraph 1.5 to the above grand total calculated of 792 in paragraph 1.6; the resulting total is 1188. Bearing in mind the statement in the Socio Demographics section 2.1 of the MIR 2 projecting an increase in houses totalling in the Borders to 1289 by 2026, we feel that the total number of houses projected in the area of Peebles and Eshiels is over demanding and causing us considerable concerns.**

## **2.1 THE MAIN ISSUES REPORT NOTES IN THE SECTION 'PLANNING FOR HOUSING' WITH REFERENCE TO PEBBLES:**

3.3 The LDP2 must incorporate a generous supply of housing land for a range of users. Although there have been limited annual completion rates for mainstream housing, there has been a significant increase in housebuilding by Registered Social Landlords which has offered greater opportunities for affordable units. Given the limited take up of allocated housing sites, the high land supply within the current LDP and the limited number of new houses required for the Scottish Borders within the proposed SESPlan, **it is not anticipated the LDP2 will require a significant number of new housing sites.**

**3.6 The built and natural heritage are major component parts of the attractiveness of the Scottish Borders which must be protected and enhanced.** There are a large number of listed buildings, conservation areas, landscape and biodiversity designations and opportunities must continue to be explored to capitalise on these assets in the interests of tourism and economic development. LDP2 must continue to ensure new development is located and designed in a manner which respects the character, appearance and amenity of the area and that good placemaking and design principles continue to be implemented.

3.13 Within the Western RGA, the main settlements of Peebles, Innerleithen and Walkerburn are located along the A72. The success of outdoor recreational facilities at Glentress has helped tourism in the area and helps the status of Peebles as a recognised buoyant town centre. **Peebles remains a very attractive area for prospective house builders partly due to its proximity to Edinburgh.** However, potential flood risk and the need for a second bridge prior to any housing land being released on the south side of the River Tweed limit options at this point in time.

4.5 One of the main challenges is to find new employment land for business and industrial use in the vicinity of Peebles. There are significant constraints in identifying both employment and housing land in this area, largely due to traffic congestion issues, the need for a new bridge to allow the town's development to the south of the River Tweed, flood risk areas and topographical constraints. **Peebles remains a highly attractive town for prospective development and the LDP2 needs to consider options for both short and longer term purposes.** Due to the ongoing uncertainty as to when or indeed if a new bridge will be built, any proposals identified to the southern side of the town can only be longer term options. An independent study was carried out by consultants to identify site options within the vicinity of Peebles. The study findings have informed the potential site options set out in the MIR.

5.7 Whilst the western area has a considerable amount of undeveloped allocated housing land it should be noted that much of this is within Innerleithen and Walkerburn which have more limited housing market interest. **Historically Peebles has a vibrant market for housing development and the development industry will continue to seek further land in this area to meet demand. However, due to a number of physical and infrastructure constraints further housing site options are limited.**

5.8 The Scottish Borders is an attractive area to live and work in and the Council continues to receive many applications for housing in the countryside. Whilst supporting such proposals which can help economic growth and local village services, this must be weighed up against matters such as the protection of the Scottish Borders countryside and sustainable travel principles. **The Scottish Borders has outstanding scenic qualities within its landscape and planning policy seeks to protect it.**

**The proposals for the Peebles Region go against these critical issues stated in the above paragraphs.**

### **3.1 PROPOSED DEVELOPMENT IN CARDRONA.**

1. The Longer Term Preferred proposal SCARD002 is to develop to the north of the A72. Cardrona is at present between the B7062 and the River Tweed and is now fitting into the landscape well. The long term proposal will damage this.

2. The site is large 23.8 Ha and the Site is still to be calculated. The existing Cardrona has some 400 houses and the proposed area SCARD002 is certainly half of the area of the present Cardrona. Thus we predict there will be almost additional 200 houses. The occupants will surely need to shop in Peebles.

3. The note 6 'Consideration to re-routing of the A72 through the site' is illogical and appalling. The A72 is an equivalent to a Trunk Road across the Borders serving the east and west and **should not be re-routed in this site.**

### **4.1 FUTURE ACTION RECOMMENDED:**

1. A realistic size of the Town of Peebles is to be established with consideration of the town character, roads, parking and housing accommodation.

2. The MIR goes on to say in: 2.24 The development plan process seeks to ensure the right development takes place in the right place. The Scottish Borders is an attractive place to live and work and the Council must continue to strike the balance between supporting sustainable economic growth and protecting the landscape and environment. The Council places a very strong emphasis on placemaking and design principles when assessing new development proposals.

### **4.2 What size should Peebles be?**

1. The streets cannot be improved to take the amount of traffic proposed. A realistic appreciation of the traffic that the streets can accommodate is important.

2. There would be a need for a new supermarket – where is it to be sited?

3. The fact that the sites for future development are on the edges of Peebles including Eshiels and Cardrona. Therefore the need for cars to go into town is predominant and the fact that the car parks cannot cope with the present car population becomes critical. Where are the new car parks going to be sited?



#### **4.3 A long term physical plan and map for Peebles setting out the following:**

1. The road improvement plans in detail.
2. The infrastructure: water supply, drainage, foul drainage and sewage treatment plant site plan to accommodate growth proposed in detail. The routes for the long term sites to connect to the infrastructure services is critical.
3. The proposed siting and size of the proposed Primary and Secondary schools bearing in mind that in the Peeblesshire News issue Friday November 30 stated that the Secondary is not coming for 13 years.
4. The Health Centre can only just provide a service for the current population of Peebles and District

#### **5 Our Concerns.**

**We reiterate our concerns already mentioned and would like to make the following observation:**

**Peebles appears to be the only major town under pressure from developers due to its proximity to Edinburgh. We have demonstrated by viewing the adjacent locality (Eildon) that the MIR is placing Peebles under pressure to satisfy the housing need for the Scottish Borders from the current SESPlan demands and future demands.**

**We note that the MIR does not mention in the Eildon Locality any Longer Term housing developments whereas the Peebles area Tweeddale Locality we calculate some 570.**

**We do not agree with the statement in MIR 3.13, 4.5 and 5.7 that provision should be made to satisfy the demands of developers irrespective of the needs of Peebles.**

**We do not agree with the independent landscape study (Western Rural Growth Area Development Options Study) results to find site options within the vicinity of Peebles. The sites are obviously not feasible due to problems of their siting.**

**We feel that the Western Growth Area has been unfairly targeted. Why were no similar studies carried out for the other Growth Areas to find development sites?**

**Peebles is an attractive town and the proposals in the Main Issues Report for additional housing both in the short term and long term will cause damage to the town unless we have a long term plan addressing all issues.**

**The Main Issues Report does not respect the issues of the town of Peebles and the surrounding community of Esheils.**