

Local Development Plans Team
Scottish Borders Council
Newtown St Boswells
Melrose
TD6 0SA

30th January 2019

ESHIELS SITES MESH1001 AND MESH1002 REPRESENTATION TO LOCAL DEVELOPMENT PLAN 2 MAIN ISSUES REPORT

Dear Sir/Madam

This representation relates to sites **MESH1001** and **MESH1002** which have been identified in the Main Issues Report as “**Preferred Options**”, for mixed use development, including proposed allocations for housing of 200 units and 40 units respectively over a total of 26.1 ha (64.5 acres).

The submission which follows below responds to **Questions 6 and 7** within the Main Issues Report and specifically addresses, in respect of the above-named sites, the questions:

“Do you agree with the preferred options for the provision of additional business and industrial land/ mixed use land in the LDP?” and
“Do you agree with the preferred options for additional housing sites?”

We write on behalf of our Client, [REDACTED], who is acting as representative for most members of the Eshiels Community, hereinafter referred to as “the Community”, and as named within Appendix 1 to this submission. **The Community strongly objects to the potential allocation of both these sites for housing/ mixed use development** for the reasons outlined in this submission, and this representation therefore forms an **objection** to the inclusion of sites **MESH1001** and **MESH1002** in the MIR and their being taken forward as allocations for housing/ mixed use development in LDP2.

MESH1001 and MESH1002 Summary

The proposed SESPlan Spatial Strategy identifies Eshiels as lying within the Western Borders Strategic Growth Area and the Northern Housing Market Area. It is also identified, at a local level, within the MIR as lying within the Tweeddale Locality.

The two sites are located to the immediate east and west of Eshiels, which is not an identified settlement within the current LDP. Eshiels comprises only a small cluster of houses and farm buildings within a rural environment which has no visual connectivity to Peebles, two miles to the west. The Report ‘*Western Rural Growth Area: Development Options Study*’ commissioned by Scottish Borders

Council and prepared by 'LUC' states that there is also a sawmill at Eshiels but the sawmill has, in fact, been closed for approximately 20 years and there is thus no Class 4 or Class 5 business uses at Eshiels to the north of the A72.

To the east of Eshiels is the recreational hub of Glentress and further development lies to the south of the A72, consisting of the Peebles/ Eshiels recycling centre, sewage treatment works and residential development.

MESH1001 extends to 19.4ha (47.9 acres) and has a proposed mixed use allocation with an indicative housing capacity of 200 units, whilst MESH1002 extends to 6.7ha (16.6 acres). Both sites are currently in use as agricultural land.

Objection to inclusion of MESH1001 and MESH1002 as 'Preferred Sites'

Eshiels is a small settlement 2 miles to the east of Peebles with no visual connectivity to Peebles. The scale of the expansion proposed is wholly disproportionate to the size of the small settlement which currently exists and to the landscape setting in the Tweed Valley Special Landscape Area (SLA).

There is no enclosing landform in this location and the site is very prominent in the landscape setting and specifically on the approaches to and from Peebles. The area is exposed and its development will have a material detrimental impact upon the setting of Eshiels and will appear incongruous within the wider landscape. In terms of the Council's adopted policy PMD2 'Quality Standards - Placemaking and Design', it is not considered that development of the scale proposed at this location would be based upon a clear understanding of the context or the 'sense of place' of the existing settlement of Eshiels. The development would not be of a scale appropriate to the surroundings and would result in a loss of openness, with detrimental impact upon the local landscape character.

As noted above, the site is located within the Tweed Valley SLA. The broad valley is the most familiar of the Borders valleys and accordingly it has a strong sense of place. The varied mix of landscape elements is highly representative, with forestry, woodland, open hillsides and pastoral farmland all juxtaposed. The valley provides the setting to several settlements and the landscape unfolds through the valley, presenting new vistas alternately dominated by forestry, farmland and grassy and rocky slopes. This attractive landscape is a major attraction for visitors and tourists and a development of the scale proposed will not only have a materially detrimental impact upon the SLA but will also have a negative impact upon visitor enjoyment of the local area.

The adopted Supplementary Guidance '*Local Landscape Designations*' sets out 'forces for change' in the SLA and two key forces which are clearly recognised are development pressures at settlement edges for housing, commercial developments and road upgrades, as is clearly now the case at Eshiels. The 'management recommendations' include the careful management of land use at settlement edges and consideration of landscape and visual impacts of proposed developments around settlements. Notwithstanding the sites' proximity to Peebles, the location is nonetheless sensitive and development

of the scale proposed would not be compatible with, or respect the character of the surrounding area and has the potential to have a materially detrimental and irreversible impact upon the Tweed Valley SLA and tourism associated with the stunning landscape.

Clearly, there is known difficulty with securing short and medium term allocations for residential development to the south of the River Tweed in the local area, partly on account of the single vehicular bridge in Peebles operating at, or close to, capacity. The sites at Eshiels were therefore identified, arguably as a somewhat 'knee jerk' reaction within LUC's '*Western Rural Growth Area: Development Options Study*' to identify and assess options for housing and business and industrial land within Central Tweeddale (broadly equating to a search area stretching from Eddleston to Thornielee). In the event that both the sites are developed there would be significant coalescence of development in this location on the north side of the River Tweed with consequent detrimental impact upon the SLA.

The constraints presented by an increasingly obvious lack of sufficient infrastructure extend far beyond the lack of a second bridge over the River Tweed. It is recognised by the Council that schools in Peebles are at, or nearing, their capacities. Indeed, in the MIR Site Assessment, it is noted that Kingsland Primary and Halyrude RC Primary would be at full capacity if the development of these sites were to progress and an extension or new school would be needed. This is another unknown factor and one which may impact upon site deliverability in terms of development contributions totals.

There are also significant capacity issues with health provision, with the public finding it increasingly difficult to secure a GP appointment within a reasonable timeframe. Lack of parking in the town is also becoming a serious concern with the increasing population of Peebles (due to recent significant housing development) and rising numbers of visitors to Peebles, partly due to the rapid growth of mountain biking related tourism.

The site has been assessed within the MIR Assessment as having moderate biodiversity impact, being improved pasture with mature broadleaf trees on several boundaries and as having the [REDACTED]. Further, it is acknowledged in the MIR Site Assessment that there is potential connectivity with the Tweed Special Area of Conservation (SAC)/ Special Site of Scientific Interest (SSSI) via the Linn Burn which has the potential for detrimental impact upon both these designations.

It is noted that the Council's Landscape section suggests that the logical location for business/ industrial land within MESH1001 would be on the southernmost, more gently sloping fields, with housing in the larger field to the north. It is considered that the location of business or industrial land in close proximity to the A72 is likely to have a greater detrimental impact upon the landscape setting than housing of appropriate density, with any landscaping taking many years to mature as has been the case, and continues to be the case, at Cardrona.

The Roads Planning Officer has confirmed, in the MIR Site Assessment, that the existing access is unsuitable to support a substantial increase in dwellings and a new junction will therefore be required to the west of the existing. Further access points are likely to be required to disperse traffic movements and aid connectivity. This major infrastructure investment has the potential to affect deliverability of the site and also impact upon the SLA.

The MIR Site Assessment acknowledges that the site does not benefit from public transport infrastructure. Significant transport infrastructure improvements would need to be investigated, as would sustainability of pedestrian infrastructure related to the A72. Currently buses block the carriageway, upon stopping, and there are few safe places for pedestrians, including children, to wait for buses.

Whilst the Innerleithen to Peebles walk/ cycleway exists, this lies to the south of the A72, beyond the recycling centre and there is no direct link onto this off-road route from either of the sites other than by joining it after it crosses the A72 some distance to the west or at the Glentress junction. At present there are no safe off-site active travel connections to provide sustainable travel links to Peebles. Without a new safe off-road route to Peebles which is constructed to directly connect with the site, there would be an increased number of pedestrians which would have to use the existing pavements adjacent to the busy and fast (50 mph speed limit) road, thus putting more pedestrian traffic at risk. Further, it is understood that since the location is slightly under three miles from the High School, children are not eligible for free bus transport and some have no option but to walk next to the busy road.

There is no public sewer at Eshiels. It would appear from the MIR Site Assessment that it is not known whether there is capacity within the water treatment works or the waste water treatment works to service the scale of development proposed. The level of investment which would be required in order to service the sites is currently therefore unknown. Given sewerage capacity continues to be a major factor in site deliverability in the Borders generally, it is considered to be premature to allocate such a large site without knowledge of capacity issues. Water treatment capacity issues are also becoming a real issue in the Peebles area.

There may be co-location issues, including odours, with the nearby Peebles waste water treatment works and the adjacent Eshiels recycling centre.

A section of MESH1002 at the south side appears to lie within an area of flood risk presented by the River Tweed. There is genuine risk of increased risk of surface water flooding once the development has taken place.

The proposed allocation to the west (MESH1002) has a core path running through it and it is noted that there is a tree preservation order to the west of the site boundary.

There is a Scheduled Monument in the south east corner of MESH1001 site - physical remains and the setting of Eshiels Roman camps. The Council's Archaeology Officer also notes that there is a ring ditch within the sites and potential for prehistoric burials and a cemetery. Given the scale of potential development across both sites, Historic Environment Scotland (HES) has expressed some concern, evident within the MIR Site Assessment, that there could be a direct physical impact upon scheduled remains from installation and upgrades associated with access roads and infrastructure. This represents a notable constraint which has not been adequately investigated.

The precise level of engagement with relevant landowner(s) is unknown by the Community, although it is thought to have been very poor. For example, one owner of two fields involved in the proposed allocation knew nothing of the proposal until a public meeting just before Christmas. It is noted that LUC's study states *"The original intention of the study was to contact the relevant landowners to determine their level of interest in bringing shortlisted sites forward for development. However, a lack of readily available landowner information, and the need to bring the study to a close, meant that **there was insufficient time to undertake meaningful engagement with landowners.** It was agreed with the Council that landowners would have the opportunity to participate in future consultation on the study outputs."*

Clearly a *fundamental* aspect of site deliverability is landowner and developer willingness and sites should only be allocated where there is such willingness to engage in taking forward the development process. This is being acknowledged by the Council with allocations for 95 units in the current LDP being proposed for removal in the next LDP due to lack of landowner or developer interest in progressing allocated sites for development. The designation of the sites as '*Preferred*' options would thus appear to be significantly premature.

Within the MIR Site Assessment there appears to be a conflict within the Council as to the most suitable use for site MESH1002. The Landscape Officer states that the site would be best suited to housing, restricted to the upper ¾ of the site, whereas Economic Development states that the site would be more appropriate for commercial/ tourism based mixed use development. Whilst the MIR is early on in the Development Plan process, and a Site Brief would likely follow, it is of concern that there is not a shared vision for the sites at this stage.

It is considered that Central Tweeddale is able to present more logical and sustainable options for mixed use development and housing development than are available at Eshiels. For example, the 6.8 ha (16.8 acre) site MINNE003 (Innerleithen) is a 'preferred' site in the MIR with an allocation for mixed use development of only 50 units for housing. This site is capable of achieving significantly in excess of 50 units, even allowing for low density housing at the settlement edge, open space and robust structure planting in order to minimise impact upon the Tweed Valley SLA. This site also represents a natural extension to the Innerleithen development boundary, being located adjacent to existing residential development on the west side of Traquair Road and the A72. The scale of the proposed allocation is in

keeping with the existing settlement, unlike at Eshiels, and allows organic growth of Innerleithen to the west, but not beyond the reach of existing housing which lies to the north of the A72.

Innerleithen is an increasingly popular place in which to live, mainly due to its countryside setting, combined with recreational opportunities and excellent public transport links to both Edinburgh and the central Borders. It is important that land allocations are made in sustainable and sought after locations where development proposals will come forward and be deliverable in a reasonable time-frame on account of demand and lack of major infrastructure constraints, the latter which has been noted to exist at Eshiels herein. The members of the Community at Eshiels on behalf of whom this objection is submitted are of the view that, given the vast investment in the Borders railway, the focus for major housing development and business development should be close to the railway corridor due to sustainable transport links being in place, unlike at Eshiels.

Paragraph 5.15 of the MIR states *“Given the established 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 SESPlan housing land requirement has yet to be agreed by Scottish Ministers following consideration of the findings at Examination by DPEA, the finalised housing land requirement is unknown at this stage. Consequently, the MIR identifies more options than are anticipated to be required in order to allow flexibility should the housing land requirement be increased by Ministers.”* The significant allocation of 240 units appears to somewhat excessive and concentrated within one rural location within an SLA which is almost devoid of necessary infrastructure to absorb the demands which would be imposed by the development. There are no assurances regarding deliverability within the LDP2 timeframe as very little background research has been done, including establishing landowner willingness, as noted above and drainage/ water supply capacities.

Within the Northern Housing Market Area, in Dolphinton, Site ADOLP004 has been given a ‘preferred’ site status in the MIR. The scale of this site (1.3ha), with an indicative capacity of 10 units, is considered to be appropriate given the size of the existing settlement. In stark contrast, the size of the proposed allocations at Eshiels, not even a settlement in planning terms, is grossly disproportionate to the existing hamlet size and its ‘sense of place’.

Summary

The Community believes that the sites at Eshiels should not progress to allocation within the LDP2 for mixed use development, including approximately 240 houses for the following key reasons:

- The sites are not considered to be capable of being delivered within the Local Development Plan lifespan due to significant infrastructure constraints which have not been sufficiently researched to date. These include landowner willingness, sewerage capacity, water treatment capacity, archaeological constraints and roads infrastructure requirements.

- Other significant material infrastructure constraints include schools capacities and healthcare facilities.
- The scale of development is incongruous with the existing settlement, the landscape setting and the SLA.
- The site presents moderate biodiversity constraints including potential impact upon the River Tweed SAC/ SSSI.
- There would be an unacceptable landscape impact from key receptors along the A72 given the openness and topography of the site.
- The site is located within the heart of the Tweed Valley SLA where management recommendations include taking great care with development on settlement edges. Development of either or both of these sites would materially and detrimentally impact upon the SLA and the features for which the designation exists and may have a materially detrimental impact upon tourism.
- There are archaeological/ heritage constraints within part of the site. Installation/ upgrading of infrastructure may detrimentally impact upon these interests.
- The existing access is not suitable. Major investment would be required to create a new 'through route' access within the sites and new junctions with the A72. The viability of this investment requirement is unknown, which could realistically affect deliverability.
- There is no direct and sustainable off-road link to Peebles. The walkway/cycleway is located to the south of the recycling centre with the nearest connection points onto the route being at some distance from the site and requiring crossing of the busy A72.
- There are more suitable and more readily deliverable sites within the Northern Housing Market Area which can contribute to the housing land supply requirement.
- Development should be concentrated in sustainable locations, such as in close proximity to the Borders Railway.
- The location is not sustainable from a public transport provision or 'active travel' perspective. Existing provision is unsatisfactory based even on current demand at Eshiels.
- Overall, there are considerable constraints noted herein which could prevent development of the site within the lifetime of the LDP2.

Yours faithfully

[REDACTED]

[REDACTED]

ERIGHT PLANNING

Appendix 1 - /

Appendix 1:

The addresses of those members of “The Community”, as defined in this submission include:

