

Response ID ANON-7TG7-FAXN-P

Submitted to LDP2 - Main Issues Report

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Data protection

About you

Are you responding as an: individual, organisation, or an agent acting on behalf of a client?

██████████

Individual

What is your name?

Individual name:

██████████

What is your address?

Address line 1:

██████████

Address line 2 :

██████████

Address line 3:

Town/City:

██████████

Post code:

██████████

What is your contact number?

Individual Phone No:

██████████

What is your email address?

Individual email:

██████████

Vision aims and spatial strategy

Question 1

Q1 Agree aims LDP2:

Whilst it is difficult to disagree with these broad based aims without more detailed explanation what does it mean? For example reference to building sustainable communities should in my view include a concept of what sustainable means - this isn't just environmental sustainability so it is left dependent on definitions which are absent.

Growing our economy

Question 2

Q2:

I agree the preferred option or retaining the status quo (option 3)

Q2 upload:

No file was uploaded

Question 3

Settlement business allocated:

Not specifically but it would make sense to focus on areas within walking./cycling distance of the train line first (i.e. point 4.3) , followed by similar focus on areas

according to the unemployment in those areas.

Upload Q3:

No file was uploaded

Question 4

Business Use Towns:

no

Upload Q4:

No file was uploaded

Question 5

Land delivery effectively:

Where planning is granted for a change of use from a business class to residential there should be a requirement for further business land to be allocated for potential development otherwise more and more work will move out of the borders.

Question 6

Agree?:

I note that the total of mixed use land (preferred) is 37.5 HA, with pure commercial land at 11.7HA and residential at 23.1HA.

The issue is that there seems to be no target for the percentage split between commercial and residential on mixed use land. Developers will undoubtedly make more out of housing than industrial so will favour the former in the same way as they favour non-affordable housing over affordable housing even though there is a clear target for that.

So I believe a target should be included.

On average the housing density derived from preferred housing sites is just under 13 per HA, for mixed use it is just under 10 - so there is an implied target of circa of apron 25% so why not set that as a target?

Upload Q6:

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Planning for housing

Question 7

Housing agree?:

The presentational approach of LDP2 within the MIR is much improved over the previous LDP although that in itself makes comparison difficult.

I note particular reference to the following:

2.21 "The SESPlan confirms the success of the Borders Railway has provided an impetus to drive new development, regeneration, tourism and business opportunities into the heartlands of the Scottish Borders."

2.21 "the dualling of the A1 and local improvements to the A68 and A7 are being promoted to improve journey times"

The MIR and Planning for housing specifically do not appear to target using the benefits of these major investments and improvements .

3.3 "It is not anticipated the LDP2 will require a significant number of new housing sites"

Whilst a 'significant number ' is not defined the proposals include the use of Longer Term sites. Why should Longer Term sites be included given that a 'significant number ' is not anticipated.

I also note in particular items referring to "the vicinity of Peebles":

4.5 "One of the main challenges is to find new employment land for business and industrial use in the vicinity of Peebles

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"

The report highlights a number of concerns regarding the Peebles vicinity:

The road network

Traffic issues

The river crossing

Topology

Flood risks
Preservation of ecology
School capacity
Health care capacity
Social care
Affordable housing needs

At the public consultation meeting we were assured that SBC had made enquiries of the relevant bodies regarding capacity for Health Care and School capacity. However a Doctor from Hay Lodge (present at the meeting) advised councillors that the two practices were very much at or beyond capacity as it stands and that the Health Authority were not in a position to know whether there was capacity because of the way Practices are structured. There is no provision to add capacity.

Social Care needs are highlighted in the report, especially in view of the increase of those aged 65 or over, a particular issue for Peebles, yet no explanation of how Social Care needs can be met is provided.

Certainly those who live and work in the Peebles 'vicinity' express concerns about many of the matters in the list above and whilst these matters are highlighted the MIR fails to address what needs to be done.

"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"

Was an independent study considered or commissioned for anywhere else in the Borders? If not why not?

What justification is there for singling out Peebles other than the belief that developers want to develop in the Peebles vicinity? That is neither a sufficient nor correct reason for singling out Peebles for special 'treatment' at the cost of the council tax payer.

The proposal includes Preferred, Alternative and Longer Term Preferred options.

However no overview of any sort is provided as part of this report. No aggregated analysis of the total numbers of developments nor their proportions across the location boundaries is considered.

A simple desktop analysis quickly demonstrates that Tweeddale is bearing way more than its fair share by any standard. What follows is my personal analysis based on information from the report and/or from figures on SBC's web site. I appreciate it is possible it contains some errors and am very happy to submit the detail for verification.

Whether we consider Tweeddale's land area or population as a proportion of the whole of the Borders it is being asked to bear a wholly disproportionate share of development.

If we consider the Scottish Borders population Tweeddale has some 18.2% of the population spread across 20.7% of the land (Population figures based on Scottish Borders Community Planning Partnership 2016 Strategic Assessment Extracts).

Capacities for development are provided for Mixed Use and Housing sites for both Preferred and Alternative options. They have not been included for Longer Term sites so in order to make any analysis meaningful I have taken the average density from preferred sites and used that.

Let's consider the development capacity share for Preferred Options including Mixed Use, born by Tweeddale as a percentage of the whole development capacity share. Tweeddale bears 67.8%! If we include alternative sites this does drop - to 45.1%. If we include Preferred and Longer Term Preferred it jumps to 83.7%.

So by any measure Tweeddale is taking 2 to 4 times its natural share.

Whilst the report mentions removing some allocated sites I don't find these in the previous LDP. It may be that these are published elsewhere but it is very difficult to find out what is currently a Preferred site and what is not, not least because quite a few documents available are undated.

Even if we consider Preferred options from the original LDP and aggregate the two plans we still see Tweeddale taking more than 50% of the development burden.

If all these sites were developed (Preferred, Alternative and Longer Term) then the number of households in Tweeddale would grow approx 12% and the rest of the borders approx 1%. (this is based on the total number of households in the Scottish Borders being 54306 in 2017 - Scottish Borders Council Area Profile).

Including Preferred, Longer Term and Alternatives Tweeddale would gain 1177 residences out of a total across SBC of 1815.

How can that be of benefit to the Scottish Borders as a whole never lone Tweeddale?

No provision is made for the demands that would place upon the Peebles vicinity infrastructure.

Now to what is in the report.

There seems to be no strategy for how these Preferred options or their Alternatives are determined.

Whilst many 'Alternative' development options are identified there is no explanation of what makes them alternative or whether there is anything to stop them just being developed anyway. Are they alternatives for that community, that locality boundary or the whole of the Borders? Does the successful development of a Preferred site kill a similar alternative?

Unless there is some restriction on 'alternatives' it's just another area of development.

The separation of Mixed use and residential sites may make sense overall but the preferred options for additional housing cannot be considered without considering those that may arise on Mixed Use sites.

The introduction of 'Longer Term' development sites to this plan creates further challenges.

I note the SESPlan is not yet adopted and may have an impact on what is actually desirable including how much housing may be needed. Including Longer Term sites before the adoption of SESPlan is putting the cart before the horse.

The 4 Longer Term proposals are ALL within Tweeddale. Indeed all are within a 10 mile radius of Peebles, so this creates particular problems for the area.

For reasons which remain unclear no site capacities are given for Longer Term sites. This is unhelpful when considering the value of a specific Longer Term site.

Two of the 4 Longer Term proposed sites are south of the river Tweed in Peebles. These sites may never be deliverable given the requirement for an additional river crossing first.

Including Longer Term sites can create a blight on adjacent properties for no good reason.

In short Longer Term sites should not be included in the LDP.

So when considering all of this together I would highlight the following:

Eildon has the highest proportion of population yet capacity of preferred sites is second lowest and only 2.8 percentage points higher than the lowest whilst being 61.8 percentage points lower than Tweeddale

Tweeddale is the second most populated locality (just) but has the highest capacity of preferred sites by a factor of over 5:1 (Tweeddale share 67.8%, next highest share is Berwickshire with just 12.2% of the share).

Development should grow in such a way as not to put unsustainable pressures on any existing area. However these proposals mean that the Tweeddale locality, with the most challenges for locating good quality housing development land and with the least capacity for providing a sustainable infrastructure for that additional development, is being saddled with a completely disproportionate burden. This will likely destroy the very reasons why, to date, the Tweeddale area has been considered to be so desirable.

So in summary:

Planning for Housing and the Main Issues Report totally fail to address the infrastructure needs to support development and there is no justification for including Longer Term sites.

The report fails to provide a top level view that shows what this means for the Borders as a whole. If it had it would be immediately obvious that this plan has an unjustifiable impact on Tweeddale.

Lastly carrying out local studies without explaining the methodology by which one location is singled out for such treatment undermines any sense of 'fairness' especially when it seems to support a result with one locality taking 67.8% of the Preferred development burden.

This suggests that no consideration has been given to the challenge of housing needs being shared across the Borders, a huge omission.

Upload Q7:

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Question 8

Housing countryside:

I believe that the alternative proposal is worthy of consideration. However it needs considerably more detail. Whilst the use of exceptional design quality is highly desirable it should not preclude the creation of smaller, lower cost homes in the countryside as individual sites or groups of two or three. I am thinking that there is an opportunity for small self build groups to benefit.

Upload Q8:

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Question 9

Agree removed housing :

Whilst the report mentions removing some allocated sites I don't find these in the previous LDP. It may be that these are published elsewhere but it is very difficult to find out what is currently a Preferred site and what is not.

It is very difficult to work out what is actually current and meaningful across the many documents and appendices across this LDP and the previous LDP. It is not helped by the fact that many of these documents carry no date!

Supporting our town centres

Question 10

Core Activity Areas:

I agree the preferred option. I think uses Classes 2, 10 and 11 make sense with all matters considered on a case by case basis.

Question 11

Berwickshire supermarket:

No

Upload Q11:

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Question 12

Develop contrib town:

I think they could be but it depends on the scale of the development. I.E. converting an upper story into one dwelling is ok. Converting 20 offices to flats without a contribution would not make sense as Developer Contributions are very necessary to maintain local services.

Delivering sustainability and climate change agenda

Question 13

Support alternative option:

I support the preferred option.

Question 14

National park:

I do support a National Park. The feasibility study seems to focus on the South Eastern borders which seems to miss the particular beauties of the Western Borders and the Upper Tweeddale National Scenic Area.

Upload Q14:

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Regeneration

Question 15

Agree redevelopment:

The proposed sites look ok but it looks as though more work should be done to find redevelopment sites across a wider area of the Borders.

Upload Q15:

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Settlement Map

Question 16

Oxnam settlement:

I have no personal issue with it but would leave that to those who live there.

Question 17

Core frontage Newcastleton:

No - inappropriate development in the past is not an excuse for relaxing at a later date - this approach just undermines planning control and in particular conservation areas.

Planning policy issues

Question 18

Agree amendments appendix3:

I believe that PMD5: Infill Development is insufficiently restrictive and In Fill over time changes and undermines the nature of a whole area unless sufficiently controlled. Currently there is very little effective control.

Any other comments

Question 19**Other main issues:**

There is no real detail provided on infrastructure requirements where development is taking place. I.E. what is the impact on existing infrastructure of a development, particularly health, social care and education.

As I have mentioned elsewhere the report does not provide an aggregated view of what it means for the Scottish Borders. Rather it seems to be built bottom up. Choices should be driven not by developers but by the people that live and work in the Borders.

There is no indication that the public feedback will be consolidated and/or shared back with the public so we have a real feel of what people have said and think.

Whilst sharing anecdotes may be ok this should also be backed with analysis.

Landowner details**Have you submitted any site suggestions in this consultation?**

No

If yes, please confirm the site and provide the landowner details (if known) for each site you have suggested.:

N/A