



Community Council of the Royal Burgh of Peebles & District

Main Issues Report 14th February 2019

Introduction

This response to the Main Issues Report (MIR) by the Peebles Community Council has been informed by taking the views of many people who live in and around Peebles who feel strongly that their views and objections to these proposals need to be clearly heard to avoid the area becoming swamped with housing and blighting the lives of those who currently live here.

Given that this consultation process is being carried out across the whole Borders region and affects so many communities, it is very surprising that the consultation process itself is not more transparent. Unlike the planning process where detailed plans can be found alongside other relevant comments and objections on the planning portal and open to scrutiny by all, this consultation process seems to be a private affair where officers receive the comments and then proceed to develop the next LDP. The public, as far as we are aware, has 1 that objections and other comments are accurately and properly taken into account. **This is unacceptable and must be rectified.**

What drives many of these concerns are some of the rather glib responses provided by officers during the public consultation events relating to the identification of sites for development and the issues of infrastructure. It was said in relation to long term proposals that we should not overly concern ourselves with these because any development on these sites will be at least 10-20 years away. And, this is the issue; once these sites have been accepted for long term development and included in a LDP, then these sites will remain acceptable for development in perpetuity. Some of the comments made during the course of these public events flies in the face of experience and anecdotal evidence relating to health and education provision, though it should be noted that concerns relating infrastructure go much further than these two highly important issues.

As will be seen below, within the body of this response, there is a great deal of concern within our community that Peebles is expected to bear the brunt of development which, we believe, should be spread across the whole of the Borders. There appears to be a gross imbalance between proposals for Peebles and the

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remainder of the Borders which is unacceptable and, we believe, contrary to Government policy.

Please note that reference to Peebles in this response includes Eshiels and Nether Horsburgh.

General Comment

The MIR discusses the Socio Demographics facing Scottish Borders Council and posits that the population will increase by 1.5% and that the age profile of that population will change with a greater number of over 45s living in the region. There is acknowledgement that this will place further pressure on health and social care. (P.12 - paras 2.1 and 2.2). Government projections (para 2.4) indicate that by 2024 the number of households will increase by 4.6% though households will contain fewer people.

The MIR also reiterates the need for the next LDP to adhere to the National Planning Framework and Regional Planning Policy in the form of the SESPlan. Three rural growth areas are identified within the SESPlan, one of those, the Western Borders includes Peebles. The SESPlan acknowledges the success of the Borders Railway and the impetus arising therefrom to drive new development and regeneration in the heartlands of the Borders, ie around the central Borders. There is recognition that improved connectivity is required to develop all the areas identified for rural growth. Within the MIR produced as part of the consultation for the current SESPlan is a comment that in relation to the delivery of planning strategies, “*a key element of this process will be to identify and secure delivery of the infrastructure necessary to achieve the development strategy*”. (Para 3.7). These comments are equally as pertinent to the development of this LDP.

The SESPlan MIR also acknowledges the need for significant investment in education, transportation and water and drainage. As will be seen below there is limited discussion in this MIR about these vitally important subjects. Indeed there is acknowledgement that land use planning should reduce the need to travel, in other words, development should be sited closer to employment opportunities and/or effective public transport.

To help identify and address the issues facing residents in our communities, SBC has embarked upon a series of Area Partnership meetings; the intention is that these meetings where local issues are identified and discussed will lead to the publication of locality plans; for this area Peebles would be included in the Tweeddale Locality Plan. It is quite surprising therefore to see very little content within the MIR that addresses in any detail many of the important issues raised by members of our communities.

Many of the comments made by attendees at these localities meetings have centred upon the lack of infrastructure that exists now, and that is before any further development is contemplated. Parents are anxious that schools, both primary and secondary, are very close to full capacity; they are concerned that further pupils will lead to overcrowding of schools to the detriment of current pupils. Everyone in our

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community is concerned about the current state of health services, with the ability of the local health centre and the Borders General Hospital to cope with significant increases in patient numbers. Contrary to what planning officers have said at MIR consultation meetings, there is a great deal of anecdotal evidence, as well as evidence from medical practitioners which flatly contradicts the rather rosy view of officials that there is sufficient capacity within our GP facilities in particular.

Housing need/capacity

In relation to housing demand, the MIR is confusing and contradictory. At para. 2.1 the population is projected to grow over the period 2017 - 2026 by 1.5%. Assuming two persons per household (as assumed in para 2.4) this would require in the region of 900 or so houses by the end of the period. In para 5.2, the SESplan posits that the housing land requirement is for 3481 up to 2030/1.

The MIR states that the LDP2 must incorporate a generous supply of housing land for a range of users (para 3.3). The built and natural heritage of the Borders must be protected and enhanced (para 3.6). We agree with this sentiment. We also agree that new developments should be located and designed in a manner which respects the character, appearance and amenity of the area (para3.6). The proposals as they affect Peebles and the surrounding area including Eshiels and Nether Horsburgh do not achieve this nor could any clever design achieve this. Para 3.7 discusses the need to reduce travel and greenhouse gas emissions, how these reductions can be achieved by locating large development well away from what infrastructure that exists is something of a mystery.

The MIR is contradictory on the requirements for housing land, as stated in the preceding paragraph, the LDP2 must incorporate a generous supply of housing land. Why? Paragraph 5.12 of the MIR states, “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”. This gives rise to another question which is discussed in other parts of this response, why is the Peebles area being allocated a grossly disproportionate amount of sites and development?

What is particularly interesting is the comment at Para 3.13 of the MIR that the success of recreational facilities at Glentress has helped tourism and helps to improve the status of Peebles as a buoyant town centre. The paragraph then goes on to say that the area “remains a very attractive area for prospective house builders. Whilst this might well be the case no evidence is offered to demonstrate that Peebles requires more housing of the numbers proposed. House builders will always be keen to build on greenfield sites especially in areas that are likely to be attractive and where houses can be easily sold; that however should not provide reason to cover large tracts of agricultural land with housing. That there is a requirement for more affordable housing is not in dispute, the types of housing likely to be developed in many of the proposed sites will not be affordable housing. What makes the upper Tweed valley unique is that the town central to this area, Peebles, is an attractive and vibrant town and also that the area is known for its natural beauty. As is acknowledged in the current LDP, large tracts of the upper Tweed Valley is a National Scenic Area and

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Special Landscape Areas. If these long term proposals are allowed to be developed then we will have ribbon development down the Tweed Valley along the course of the A72. This type of development would be wrong in principle and wrong in practice. It would detract from the natural environment which is vitally important to the success of the area as a tourist destination. Much is said in the MIR about the need for sustainable economic development; this type of ribbon development will most certainly, and adversely, affect the long term future of this area.

There has been no attempt within the MIR to establish precisely what the housing demand is for Peebles and the surrounding area. The SESPlan MIR discusses at para 8.98 that *'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'*. In other words, Peebles, in terms of development, is at or very near capacity. This then begs the question, why has such a disproportionate amount of the housing requirement been located within and around Peebles? This very point is also made in the current LDP, para 3.22, *'the plan identifies housing allocations to serve the whole area and seeks to spread development beyond Peebles into other main settlements in Tweeddale'*.

A cursory examination of the various sites listed within the MIR shows that proposed sites in Peebles and surrounding area to be earmarked for about 900 - 1000 houses (some cautious estimation has been carried out as some sites are marked TBA); the remainder of the whole Borders region has an allocation of about 740 houses. Others, within this area, have carried out more detailed calculations which indicates that Peebles is earmarked for 1100 - 1200 houses. Given the comments contained within the SESPlan discussion documents and the current LDP these proposed allocations are astonishing and unacceptable. It cannot be right that Peebles and the western area has to bear the brunt of the SBC land allocations.

Before further sites for development are considered there needs to be a root and branch review of the infrastructure which is vital to the well being of our town. This review must examine the issues of:

- Schools capacity.
- Health facilities, to include GP services and access to hospital services.
- Social care.
- Sewerage and drainage capacity.
- Roads into and around the town, this must also include a full review of Tweed Bridge capacity and the ability of our streets to absorb more traffic.

It should be noted that concerns already exist with regard to all these aspects of infrastructure need; any additional development will only exacerbate an already difficult situation in this regard.

What is curious and indeed, unsettling, is that in response to requests to planning officials for information regarding the detail of consultation with education and health officials regarding capacity in Peebles, two spreadsheets have been offered relating to education. These spreadsheets list each of the proposed sites, in some cases affecting Peebles it is said that there are no issues regarding education, in relation to other sites comment is made that they may need to be a new primary school built or that an

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extension may be required for those existing. How it can be that in some cases there is no issue with schools capacity and yet with others there is a moot point. It certainly points to a rather perfunctory and entirely unsatisfactory consultation process at best and a cavalier attitude to these important matters at worst.

Discussion with education staff reveals that they have developed figures to help assess schools capacity as new developments are planned. Essentially, for primary schools education staff calculate that for every 100 extra houses built 30 additional places will be required; for secondary schools 25 additional places are required. This means that if, over the years, 1000 houses are built in this area there will at least 300 extra primary children and 250 secondary pupils. The secondary school situation is actually worse because Peebles High School takes pupils from across the area. Using the figures provided in the MIR this means that there is likely to be another 20 or so from other areas.

There is however a SBC school estate review dated 26th April 2018 which discusses capacity at various Borders secondary schools. This document makes it clear that there are no capacity issues for secondary schools in Galashiels, Selkirk or Hawick. The picture for Peebles is very different. This document states that Peebles High School in April 2018 was at 86% capacity. The following comments were also made, *“In Peebles, however, the school roll is currently the largest it has ever been over the past 20 years. Based on current primary school rolls within the cluster, occupancy is projected to sit between 90% and 95% in the next four years...these figures do not take into account any current or future house building in the cluster.”*

That the contents of this school estates review has not informed the construction of this MIR is of serious concern and raises issues regarding the way in which the MIR has been compiled. Indeed within the conclusions of the school estates review it is said that, *“ this work (of the review) will need to link into housing developments and the production of accurate medium and long term pupil roll projections.”* This apparent lacuna provides further illustration of the need for transparency. Also, the existence of this document with such important commentary begs questions of the various responses received from officers in Education and Planning. Were officers aware of this document? If they did know, then why was it not produced when requests were made for information?

In relation to health, Council Officers say that they have had conversations with NHS staff who have said that there is sufficient health care in this area. There has been no detailed analysis conducted, that we are aware of and have requested, that could be used to demonstrate what the current position is. Indeed, close examination of the MIR background documents relating to preferred and alternative sites shows the very clear statement that the NHS has not responded to requests for information. We are left questioning the basis for the assertion that there is sufficient health care capacity. This further illustrates the need for transparency in these processes.

Transport Links

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With all that has been written in the SESPlan and in various SBC documents, the central Borders requires significant investment and regeneration, hence the development of the Borders railway and its vital connection to Edinburgh. It should therefore be fairly obvious that the majority of housing development should occur close to transport infrastructure. Peebles does not enjoy the level of connectivity that the central Borders has with Edinburgh. It should be very clear to planners that the only link between Peebles and Edinburgh is the A703 to Leadburn and then with a choice of two routes. This road is highly susceptible to adverse weather conditions and it is not uncommon for the town to be cut off in winter. Accidents can occur at any time resulting in road closure without any easy alternative routes available to commuters. To suggest that this route is a suitable main thoroughfare for the increased levels of traffic that such development will generate does not engender confidence in long term planning. We know that, currently, over 60% of the working population of the Peebles area works outwith the town; most of these people rely on cars as their main mode of transport, others rely upon the bus services. Without significant improvement in the roads infrastructure further development would be deleterious.

Whilst it is probably true that a great deal of the commuter traffic does travel north towards Edinburgh, we must acknowledge that there is a great deal of traffic that flows along the A72, both east and west. Given that three major sites are being considered for Eshiels and Nether Horsburgh, there is little or no acknowledgement of the pressure on this road system. Also, public transport, particularly west from Peebles is deficient. The suggestion that the A72 should be diverted through a new development to create a High Street at Nether Horsburgh becomes even more ridiculous when the pressure on this road is taken into account.

Again, using rather crude analysis, if the proposed 1000 houses are developed, assuming that 60% of these households will be working outside the town, then we have the likelihood that another 600 or so journeys will be made by people going to work. Can this be considered responsible planning? If commuters were encouraged to use public transport, i.e. bus services, then dependent on the numbers using the buses, many more such vehicles would be required. Which ever way these issues are considered, development on the scale proposed is ludicrous given the state of our current road system.

Shops/Leisure facilities/Car parking

It has been acknowledged within the text of the MIR that land for employment use is particularly scarce in the Peebles area. In general, suitable land for development is very scarce in Peebles. Currently there is a high demand in Peebles for car parking: in common with other Borders towns there is a serious parking problem in the town. Much of this demand is caused by people needing to travel into the town from outlying areas to do their general shopping and other business, an increase in that demand by another 1000 or so households will be difficult to accommodate. Given that the majority of these households will be in developments some distance from the town centre, residents will need to depend upon using their cars to access these services. Where will these additional cars park? Car parking in Peebles is already at

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capacity, with little likelihood of increasing that capacity the issue of parking is critical now, never mind the pressure that an extra 1000 households will create as residents travel into the town to access services.

Any additional houses will lead to increased use of our shops and supermarkets; of course this is to be welcomed, we do need a vibrant town centre which appeals to residents and visitors. However, it is increasingly likely, that should these developments occur, at least one new supermarket would be required to service the whole area. Where this could be built is a moot point; as said, there are very few, if any, suitable sites for the development of supermarkets or indeed further leisure facilities.

Site Specific Comments

Growing the Economy/Mixed use sites

In relation to land for employment use, the SESplan seeks to ensure that there is a sufficient supply of land for employment use; the SESplan also goes on to state that the sufficiency of land supply would take account of market demand and infrastructure. Apart from some quite perfunctory comment regarding each specific site, there is no separate assessment of demand nor of existing infrastructure if each of these sites were to be included within the LDP and subsequently developed.

With regard to mixed use sites, there must be clarity as to what this term actually means. There are examples where mixed use sites are predominantly residential with an occasional shop or workshop included to satisfy the characteristics of a mixed use site. We suggest that there should be a minimum, and a maximum percentage of housing developed on such sites. This would help to ensure that there is a mix of use and the retention of land for economic use.

MESH1001 - Eshiels

This site is designated as mixed use with a capacity of 200 houses. This site lies on the main entrance to Peebles alongside the A72 and lies immediately to the west of the entrance to Glentress forest. Glentress forest is one of the principal tourist attractions in this part of the Borders and has attracted considerable investment for leisure facilities including a holiday complex, outdoor tree activities as well as developing as a significant mountain biking centre. Any major development in this location begins to urbanise the countryside and detracts from what tourists and visitors are seeking, peace and tranquility. Given that Peebles is becoming increasingly dependent upon tourists and visitors for its long term survival, any development that hinders its progress in this regard has to be challenged.

The location is sufficiently remote from the town and its facilities that it will be inevitable that a development of the type proposed will have a significant impact upon road traffic. Given the need to use cars more to access shops, where will these extra cars park? Peebles is already running short of adequate parking facilities; there are very few, if any, sites that could be used for car parking.

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Apart from some low level comment regarding WWTW and WTW, which are assumed to refer to waste water treatment and sewerage, there is little or no consideration as to how high levels of waste and sewerage will be dealt with. This site is downstream of the existing sewerage facilities that serve Peebles.

Current policy EP 5 helps to protect against inappropriate development in the Special Landscape Area. These proposals are inappropriate and should be rejected.

MESHIE002 - Eshiels

The arguments against inclusion in the LDP for this site are the same as for MESH1001 above.

SCARD002 - Nether Horsburgh

This site is allocated for mixed use; housing numbers are to be determined. However, given the size of the site and indications for capacity for other sites, it is not unreasonable to assume that approximately 200 or more houses would be earmarked for this site. Again, development of this nature in such a scenic location is unthinkable. This is clearly a very rural location, nestling in the valley bottom surrounded by hills and forest and lies in the Special Landscape Area (SLA). Current policy (EP5) requires that such areas are afforded adequate protection against inappropriate development and that potential maintenance and enhancement are provided for; clearly the proposals for this development are utterly inappropriate. It would be wrong to consider that the social or economic benefits outweigh the need to protect this special environment.

It is noted that the site requirements as set out in the MIR envisages the possible re-routing of the A72 through this site. This idea seems to come from the consultation report by LUC on behalf of SBC. This report suggests that the A72 could be re-routed and combined with a new High Street or village centre serving Cardrona. This suggestion is ridiculous and the prospect of diverting the A72 equally ridiculous; we do not need a new town at Nether Horsburgh. The A72, whilst not designated as a trunk road, is the principal route connecting many Borders towns with access to Glasgow,

Over the past few years this site has been used by the Peebles Agricultural Society as the site for the annual agricultural show. The site is ideally located for such use and has gone from strength to strength since established there. This site has many benefits for such use, not least of which is the ability to use a large proportion of the site for car parking for visitors. Such shows were held in Haylodge Park in the town. Use of the park for the agricultural show did result in damage to the park which then required extensive work to repair. Now that the park has been repaired it is felt that such use is detrimental to the wellbeing of the playing surface which is used by the local rugby club; other sporting events are also held there. Hence the move of the agricultural show to Nether Horsburgh. As is well known locally, there are no other suitable sites for holding such an important show or any other show of the size and nature of this one. Whilst it might seem trite to argue that this land should not be included in the

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LDP for development; officers should be aware that such shows are at the centre of rural life and essential for the local economy. If Peebles is to retain its character as a rural town then it needs the proper space to hold events of this nature.

Now that the Peebles Agricultural Show has settled into this site there are real opportunities to develop the use of this site to benefit the whole of this area. It is quite conceivable that this site could be made more permanent and used to facilitate a variety of shows and events much in the same way that the Springwood Showground in Kelso has been developed to host many different types of events. The use of this site in this way would bring a great deal of economic benefit to the area as well as being a more appropriate use of this valuable site sitting in an area of natural beauty.

It is interesting to note that on page 43 of the MIR, para 5.8 states, “the Scottish Borders has outstanding scenic qualities within its landscape and planning policy seeks to protect it”. There is very little evidence of this with regard to the previous three sites discussed above.

SPEEB008 - Land west of Edderston Ridge, Peebles

This site of 19.5HA is earmarked for mixed use in the long term and is shown to be a preferred site. Site capacity is to be allocated but it would not be unreasonable given the size of it to assume that the housing capacity will be well in excess of 200 houses. How planning officials can believe that this site is suitable for such a sizeable development is beyond every single person in Peebles that has been spoken to about the matter. At the time of this consultation an adjacent site which is contained in the current LDP is subject of a planning application; it has attracted a great deal of objection on the basis that the Caledonian Road, which is the only access to both of these sites, is unsuitable to sustain the level of traffic envisaged. It is impossible to imagine that this old Victorian street, could sustain the level of traffic for the existing application let alone the numbers likely to be proposed for this new site. There have been calls for a full and truly independent traffic survey to be conducted on this street to establish accurate levels of capacity and sustainability; such a survey should be done before any further sites are included in LDP2. The lack of capacity for this busy road has been acknowledged in a number of documents:

- MIR for LDP 1 - the Reporter did not support the allocation of the site. “Traffic matters are also of concern and the difficulties of access via Caledonian Road and South Parks”.
- Appendix A -Response to consultation submission on MIR (2012) - Traffic Matters are also of concern and the difficulties of access via Caledonian Road and South Parks.
- Employment Land National Strategy - the Scottish Government Reporter ultimately recommended that these proposed sites were removed, primarily on access grounds relating to the ability of Caledonian Road to satisfactorily accommodate further vehicles.
- Planning and Infrastructure Assessment - “Previously, I have expressed concern.....on the grounds of traffic capacity of the roads leading to the site, i.e. Caledonian Road and South Parks. The problem with Caledonian road is parking

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in the Carriageway, forcing single file traffic and the issue with South Parks is the tortuous nature of the initial length of the road off the mini-roundabout”.

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.

This site is utterly unsuitable for the type of development proposed and should be rejected.

Housing sites

Comments made at para 3.3 of the MIR states, “that because of 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.” Why then have so many sites, indeed the majority of the proposed capacity, been included within the Peebles area?

It is quite clear that the emphasis of this MIR is on finding land that developers will wish to build on and where houses can be easily sold. This means therefore that greenfield sites are preferable and that the desire of developers outweighs the needs of the communities affected and of the need for appropriate infrastructure to be in place. These views are evidenced by the comments made within the discussion on housing relating to development completions in Section 5 and as discussed in para. 5.11, SBC are seeking to remove sites from the current LDP that have not yet been developed.

The demand discussed at para. 5.7 is driven by people from outwith the town wanting to live here. Whilst this is to be welcomed, to an extent, the town does not have the ability to cope with this influx of development. There is demand for more affordable housing in the area but there are limited opportunities to develop such homes due to the shortage of suitable sites.

Para. 5.8 of the MIR discusses the need to ensure that developments adhere to the principles of “protection of the Scottish Borders countryside and sustainable travel”. It is clear that the proposals contained within this MIR do not adhere to either of these principles and will certainly not help to protect the “outstanding scenic qualities within its landscape”.

APEEB056 - Land South of Chapelhill Farm

This 7.0HA site is earmarked as a preferred option for the development of 150 houses. If this site were to be included this would require the extension of the town boundary and represents the creeping urbanisation of our landscape. This site, which is currently under agricultural use, can only be accessed from two directions, from the north along an inappropriate narrow country road or from the south along an already highly congested Rosetta Road in Peebles.

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Apart from infrastructure issues which have been discussed at length in this document the issue of access is of serious concern. It is suggested within the MIR that a new bridge would be required over the Eddleston Water between Kingsland Square and Dalatho Street with access then onto the Edinburgh Road; this is said to be the preferred route. How this route can be the preferred option beggars belief; Dalatho Street in particular is a narrow street and not suitable for the level of traffic that could reasonably be generated. The junction then with Dalatho Street and Edinburgh Road is also problematic; this is a busy main road and whether such a junction could be engineered to accommodate increased traffic would require very careful consideration.

If this site were to be included an alternative route for a new crossing over Eddleston Water would need to be considered.

SPEEB009 - East of Cademuir Hill

This site of 13.2HA is shown as a preferred option for longer term development. Given that APEEB056 has an allocation of 150 houses it is not unreasonable to assume that this site would be earmarked for about 300. Again infrastructure issues, discussed elsewhere, are highly relevant.

This site is in an area designated as a special landscape area and lies outwith the current town boundary. This site is inappropriate for a number of reasons; access to this site can only realistically be achieved along Bonnington Road in Peebles. Access to Bonnington Road is essentially along Springhill Road. These roads are not suited to high volumes of traffic that will be generated by 300 houses. Bonnington Road itself has a number of difficult bends and a narrow choke point at the western end of it.

It is suggested within the MIR that to address the issues of access to this site, that a new road would be required linking this site to Kingsmeadows Road, presumably to meet up with a second crossing over the River Tweed (this issue will be discussed elsewhere). This proposal seems to be unrealistic and probably unworkable.

Supporting our town centres

Much is said in this section of the MIR about the need to encourage the improvement of our town centres; much is also made of the changing nature of retail and the impact that online shopping has on our town centres. The document uses these arguments to suggest that policies on town centres should be made more flexible to allow for a broader range of use. Whilst important not to have empty premises, care needs to be taken to ensure that retail premises are not lost forever. Whilst the document cites various reasons for pressure on our High Streets, the MIR is curiously silent on the part that business rates play in the viability and profitability of business that operate there.

Para. 6.9 of the MIR posits that, “if premises have been vacant for six months and evidence is submitted which confirms it has been adequately marketed for a substantial period of that time, then it will carry much weight in the decision making

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process". This may seem reasonable on the face of it but it will be necessary to provide detailed guidance as to what is deemed acceptable and/or adequate marketing and then there needs to be robust policing of this policy with serious questions asked by officials who must have the power to request evidence in support of claims. If this aspect of policy is not sufficiently robust we are likely to see many of our town centres change in nature to the detriment of the well being of the town in question.

Para. 6.13 discusses the reduction or removal of core areas. On the contrary with regard to Peebles. The map, page 82, shows that for Peebles the core area on the south side of the High Street ends at the close next to the Royal Bank of Scotland; we suggest that the core area should be extended to encompass the whole of the south side of the Eastgate to Tweed Brae. The premises currently there are two large retail outlets (both occupied), a church and the Post Office.

Consultation questions

QUESTION 1

Do you agree with the main aims of the LDP2? Do you have any alternative or additional aims?

Whilst the aims of the LDP2 are to identify suitable sites for housing and economic use within the WHOLE of Scottish Borders are perfectly reasonable, we are concerned at the disproportionate allocation of sites in and around Peebles.

QUESTION 2

Do you agree with the preferred option to retain the existing 'Strategic High Amenity' site categorisation and amalgamate the remaining categories? Do you agree with any of the alternative options including to retain the current policy position? Or do you have another alternative option?

We agree with the retention of the various designations of sites. We do believe however that there should be some flexibility allowed to ensure that we can maximise the potential to develop sites for employment use. This does mean that there has to be stringent rules and/or guidance in this regard and that planning officers will need to be robust in their interpretation of those rules.

QUESTION 3

Do you think there are any settlements in which new or more business and industrial land should be allocated, and if so where?

No comment

QUESTION 4

Do you have any suggestions for a potential area of land to be allocated in the vicinity of Town Yetholm, Lauder and Kelso for business use, and if so where?

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No comment

QUESTION 5

Have you any suggestions as to how allocated business and industrial land can be delivered more effectively?

Planning officers must ensure that when sites are allocated in the LDP2 that they are given their proper designation to preserve and enhance land that is currently occupied and available for employment use.

QUESTION 6

Do you agree with the preferred options for the provision of additional business and industrial land/ mixed use land in the LDP2? Do you agree with the alternative option for mixed use land? Or do you have other alternative options?

With regard to Peebles and surrounding area, we do not agree with the preferred options discussed and for the reasons stated elsewhere in this response.

QUESTION 7

Do you agree with the preferred options for additional housing sites? Do you agree with the alternative options? Do you have other alternative options?

We do not agree with the preferred options for housing sites in Peebles and the surrounding area. We believe as stated elsewhere in this response that the needs of the existing residents of this Burgh should be met and considered before any further substantial development is considered or allowed. The infrastructure, in all its guises, is simply not flexible enough nor has the capacity to absorb the level of development proposed. There are other parts of the Borders where development should and could be located, closer to the transport hubs which can carry commuters to Edinburgh. The role of the Council should be to ensure that the transport hubs are effective and that the public transport that services them is also effective.

QUESTION 8

Do you agree with the preferred option for addressing proposals for housing in the countryside? Do you agree with the alternative proposal? Have you any other options which you feel would be appropriate?

We agree with the proposals for housing in the countryside. However there must be strict rules to ensure that ribbon development does not occur and that the design and location of such new houses must be sympathetic to the surrounding landscape.

QUESTION 9

Do you agree with the proposed existing housing allocations to be removed from the LDP? Are there any other sites you suggest should be deallocated?

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We see no justification for the retention of SPEEB004 in the LDP, it should be removed from LDP2; as stated in the current LDP, there is no likelihood of this site being developed unless or until a new crossing is built over the River Tweed. The only access to this site currently is via Glen Road which already a busy road; it cannot sustain further traffic. Because Peebles is a preferred location for developers, this should not be a reason to keep sites in the LDP that are unlikely to be developed.

QUESTION 10

Do you agree with the preferred option? If so, which other uses do you think could be allowed within Core Activity Areas? Do you think existing Core Activity Areas within town centres should be reduced in size, and if so where? Do you think existing Core Activity Areas should be removed altogether?

We believe that designation of core activity areas should be retained and any changes managed very carefully. Once retail units, in particular, have been lost, they are gone forever and offers very little opportunity for regeneration of town centres.

QUESTION 11

Can you suggest any site options within Central Berwickshire, preferably Duns, to accommodate a new supermarket?

No comment.

QUESTION 12

Do you feel the requirement for Developer Contributions could be removed in some parts of town centre core activity areas?

No. We feel that the issue of developer contributions is fundamental to the wellbeing of the whole region. Indeed, recent experience has shown a willingness of planning officers to consider significant reductions in developer contributions in Peebles. This is quite unsatisfactory given the desire of developers, repeated many times in the MIR, to develop sites in this area.

QUESTION 13

Do you support the preferred option? Are there any other matters relating to sustainability and climate change adaption which should be addressed? Do you have an alternative option?

No comment.

QUESTION 14

Do you support the designation of a National Park within the Scottish Borders? If so, which general area do you think a National Park should cover?

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We agree that Borders National Park can bring benefits to the region and would propose that the park should extend through Ettrick to include upper Tweeddale. All of these areas have much in common, a shared cultural heritage, e.g. our common ridings, areas of outstanding natural beauty and a developing tourist industry as well as sharing many other common features.

QUESTION 15

Do you agree with the proposed redevelopment sites to be allocated within the LDP2? Are there other sites within the Scottish Borders you feel should be included?

No comment

QUESTION 16

Do you support the principal of Oxnam becoming a recognised settlement within the LDP? Do you agree with the proposed settlement plan and its boundaries?

No comment.

QUESTION 17

Do you support the removal of the Core Frontage designation within the Newcastleton Conservation Area?

No comment

QUESTION 18

Do you agree with the suggested policy amendments identified in Appendix 3? Do you think there are any other policy amendments which should be referred to?

Re PMD 4 (Development outwith development boundaries) - agree re access, re introductory text and the discussion of development outwith boundary, it is our view that Policy HD2 should continue to be considered on a case by case basis and that more clarity is required when considering proposals of this nature.

Re ED 4 (Core activity in town centres) - as discussed elsewhere in this response, we oppose reductions in developer contributions, and as far as Peebles is concerned the reduction of the core activity area. Any policy change should be carefully worded to ensure that any flexibility towards this policy should only be allowed on the basis of evidence provided by applicant and that this evidence must be capable of challenge by officers.

Re ED 10 (Protection of prime quality agricultural land) - a general comment, the allocation of some sites in the Peebles area seems to fly in the face of this policy which is to be retained.

Re HD 1 (Affordable and special needs housing) - this policy requires review to make clear that there is an expectation that the contribution to affordable/special needs

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housing will amount to 25%. This will only be varied under exceptional circumstances where robust evidence to support any claim will be provided. Such evidence must be capable of verification and challenge by officers.

Re HD 3 (Protection of residential amenity) - the MIR suggests that this policy will be amended to show that it refers to renewable energy developments; provided that these issues are in addition to the other criteria listed in para.1.1 of the policy, this is acceptable. If not, and these issues are exclusively related to this policy this is not acceptable.

Re EP 9 (Conservation areas) - rather than increase the emphasis on the need for a design statement, the policy should instruct that a design statement is required when considering conservation areas. Further, it should be made very clear that with regard to sites that have a boundary contiguous with a conservation area, this policy applies.

QUESTION 19

*Are there any other main issues which you feel should be addressed within LDP2?
Please confirm these and explain how these could be addressed.*

In Peebles the current cemetery is nearing capacity, the Community Council has been raising this issue with elected Councillors for a considerable time; no response or plans are forthcoming. It is noted in the MIR that no provision has been made for cemeteries though there is mention in Appendix 3 that a new policy is required to address these issues. This situation in Peebles is becoming urgent, a solution needs to be found. Should the various sites in this MIR be adopted within LDP2 the situation will become critical.

Policies need to be clear, the language used must be precise and capable of interpretation by readers of the policy. This Community Council has been in communication with SBC regarding the use of the word 'indicative' when used to describe the capacity of various sites. The SBC interpretation of this word is wrong in our view; it does not mean infinitely flexible as suggested. The LDP allocates sites on the basis of assumed capacity and indicative numbers are used by SBC to meet Scottish Government targets for housing. The Scottish Government clearly thinks that these indicative capacities are relatively inflexible, for if they did not, the Government would demand more precise allocations. The LDP is developed after consideration of various issues associated with each site, including all aspects of infrastructure and transport. To then allow development which greatly exceeds the allocated capacities places greater strain on existing infrastructure. The issue of indicative capacity is not confined to Peebles; a recent application before the planning committee of SBC from another area raised concerns in this regard.

Greater clarity is required and to this end policy should state very clearly that indicative capacity means that is what is expected to be the maximum that can be developed on the site. That is not to say that the policy needs to be totally inflexible; there needs to be a minimal amount of flexibility provided to cater for unforeseen

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circumstances on each site, such flexibility should be limited to, say, 5% over the stated indicative capacity.

Locality Plan Mapping

The current LDP contains various settlement maps with the map for Peebles showing the March Street Mill site as white land, meaning that it can be used for a variety of purposes. This allowed the owners of the site to make application for housing development rather than preserve it for employment use. Had the site been coloured purple, as it should have been, then this would have prevented any housing development applications from being made.

To ensure that such errors are not repeated the following properties are currently in use for employment and economic purposes, the maps should therefore be accurately provided with the correct designation:

Crossburn Caravan Park, Edinburgh Road
Harrison's Garage, Edinburgh Road
Holland and Sherry, Dean Park
Sainsbury's, Northgate
Tesco, Dovecote Road
Garage, St Andrew's Road
Haylodge Hospital, Neidpath Road
Dalgleish Garage, Old Town
Hydro Hotel, Innerleithen Road
The Park Hotel, Eastgate
Tontine Hotel, High Street
Harbro, South Parks
Southpark Garage, South Park
Tweeddale Motors, Innerleithen Road
Travis Perkins and other units, Dovecote Road
Garages at George Street and North Place
Brown Bros Garage, Edinburgh Road
George Tait's Yard, George Street
The remainder of Rosetta Caravan Park, Rosett Road
Peebles Auction House, Old Church Road
Various units in Cavalry Park, Kingsmeadows Road

The above list is not exhaustive.

Conclusions

The proposals discussed in this MIR as they relate to Peebles are entirely inappropriate for the reasons discussed within the body of this response. The proposed ribbon development along the A72 at Eshiels and Nether Horsburgh should not be included in the LDP2.

Those charged with developing the LDP2 and any successor plans must realise that the geography and topography of Peebles prevents any further wholesale development

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of the town. In addition, there must be recognition that the infrastructure needs of the town are not being met now, further development will only exacerbate an already fraught situation.

This response contains many questions as to why, despite many indications to the contrary as discussed in this response, Peebles is being targeted for the majority of the Borders housing allocations. Everything points to the need to further develop the central Borders where there is more capacity in schools for example, closer to the transport hubs that begin in Galashiels with connections that spread out through the remainder of the Borders and closer to the existing rail network at Tweedbank. The people of Peebles are not resistant to change and development, only that such development must be properly planned and managed. The notion that development can occur and that infrastructure will catch up, to support need, simply does not bear scrutiny. Peebles has been subject of significant development over the past few years; infrastructure has not caught up, it is under severe pressure.

The issue of a second Tweed crossing is something of a red herring; as previously stated the town is very close to capacity in terms of development. Of course there may be some smaller scale development on, as yet unidentified sites, but the opportunity for large scale development, in our view, is non-existent. Any significant expansion of Peebles will require more supermarkets, leisure facilities, health facilities and schools. There are no sites available within the town to accommodate such facilities. It seems utterly fatuous to consider expanding the town as outlined without considering how all of these needs can be met. Indeed without a properly considered master plan no further large scale (e.g. over 20 houses) development should be permitted.

Finally, this consultation has exposed the lack of transparency in the processes being used to compile LDP2. It is essential that all comments either supportive or objecting to proposals contained within the MIR are available for public view. The resultant LDP will set the course of development in the Borders for the next few years and will be quoted and used when considering planning applications; it is essential that the public can see what others have said and that their views have been properly considered when the LDP is completed.

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