



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

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### **Response to and suggestions for Local Development Plan 2** *(by email)*

Peebles and District Community Council has closely considered the proposed LDP2 and has the following observations to make.

#### General

**The spatial growth strategy** – This identifies three Strategic Development Areas (SDAs). However, little consideration has been given to measures that would allow the three areas to act as a unified whole. For this to happen, there is a need for improvements to transport links between them. Specifically, improvements are necessary to the A72, Galashiels to Peebles and the A703, Peebles to Edinburgh roads.

**Ballantyne Place, Peebles** – The small amount of greenspace currently existing within this development should be allocated as protected greenspace.

**Dovecot Industrial Estate** – is currently designated for mixed use and should be redesignated for industrial use only. This to protect industrial land which LDP2 admits is in short supply in Peebles.

**Large Retail Sites** – Following on from the example of March Street Mill and its previous/existing designation, the PCC strongly recommends that existing retail outlet sites such as Sainsbury's, Tesco and Holland and Sherry are designated as industrial/ Retail land. This to protect industrial land which LDP2 accepts is in short supply in Peebles.



Volume 1 - Policies

Peebles Community Council generally welcome the updated LDP, including the proposed new and updated policies and the improved clarity within them.

**General** – Policy PMD2 *requires that all new development is of a high quality and respects the environment in which it is contained.* The South Parks development in Peebles is a clear demonstration of cramped housing that does not match the quality of the surrounding houses. The developer increased the application from an indicative 50 units to an actual 71 units, and this was given approval at the Planning Committee meeting. Wording needs to be included in policies. That requires substantial justification for such an increase and an assessment of the impact that such an increase would have on the environment in general and the locality in particular.

**PMD4 – Development Out-with Development Boundaries:** This should be retitled to include “Development out-with and adjacent to development boundaries”.

**ED3 – Town Centres and Shopping Development:** Amend to include more emphasis on development and regeneration of town centres, with restrictions to be placed on new developments of out of town shopping.

**HD5 – Care and Retirement Homes:** Retitle to Care, Nursing and Retirement Homes”.

**EP7 – Listed Buildings:** Add paragraph to state that development may be acceptable if it can be clearly shown to be the only means of retaining a listed building and securing its long term future.

**EP8 – Archaeology:** amend title to “Archaeology and Scheduled Monuments”.

**EP17 – New Policy:** “Food Growing and the Community “. New policy aimed at enhancing existing food growing spaces and supporting the development and safeguarding of existing growing areas that meet community needs. Reference to the community Empowerment (Scotland) Act 2015. An obligation to identify land that can be used for allotments and community growing.

**IS2 – Developer Contributions:** Addition of flood prevention schemes to the list of infrastructure that may require contributions.



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**Peebles**

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Hay Lodge Park, Victoria Park, and Whitestone Park should all be included as protected significant greenspace bordering the Tweed.

2<sup>nd</sup> Paragraph of “Key Infrastructure Considerations”

Peebles Community Council agrees in general with the precepts noted. We would however suggest a small but important addition, identified in “blue”.

Without a second Tweed crossing in the town, to reduce traffic flow on the existing bridge and the associated mini roundabout adjacent to the Old Parish Church and take intrusive traffic away from the town centre, the addition of development traffic to the network will have congestion and environmental issues for the High Street, as well as capacity issues for Tweed Bridge and the mini roundabout, and this could compromise road safety. The most recent traffic count on behalf of the Council for Tweed Bridge was undertaken in November 2018 and through this it was demonstrated that the bridge is getting close to capacity. It is the Council’s opinion that Tweed Bridge and associated mini roundabout does not have the capacity to serve any new development in the south side of the town, and the possible exception of small infill in the north of the town. over and above the sites allocated in the Plan.

Analysis of the mini roundabout adjacent to the Old Parish Church has identified that once existing development is completed, the roundabout will be close to 100% of its operational capacity. No development in Peebles should be approved which would result in the capacity of this roundabout being exceeded.

**Reason for the change** – SBC Road Department have identified that this mini roundabout is close to operational capacity. Each new development, whether on the north or south side of the town increases the amount of traffic utilising this mini roundabout. The increase in traffic becomes especially noticeable when parents run their children to and from the High School.

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**Cardrona**

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**SCARD002** Land at Nether Horsburgh – Peebles Community Council objects to the inclusion of this site in LDP2. This site was identified by independent consultants commissioned by SBC to identify site options in the vicinity of



Peebles. There appears to have been no attempt to match recommendations in this report with SBC policies. When Policy PMD2 “Quality Standards – Place Making and Design” is considered, clearly, such a development would breach this policy. This site should not have been included within LDP2 without a full assessment of all aspects of the likely locational specific economic/tourism, community and amenity effects of the scheme.

In identifying this site for development, LUC, the consultants omitted to identify that this site is the Agricultural Showground and has been for more than 10 years. The draft LDP2 also omits this vital information. Previously, the agricultural show was held in Haylodge Park. However, the location was moved as the park was no longer deemed suitable. The agricultural show is a linchpin of rural life, one of the highlights of the Peeblesshire year, and is central to the success and wellbeing of the farming industry, not only in Peebles but in the whole of the Scottish Borders. There is also a significant spin off for tourism during the show. No suitable alternative site exists. This was raised in the responses to MIR2, but this point was not answered. It is not practicable for the show to revert to Haylodge Park, its original venue, due to traffic constraints, parking, cattle on the rugby pitches and the inadequate size of the park’s flat areas.

A reader of LDP2 may consider that development of this site would only be an expansion of the existing community of Cardrona. However, the village of Cardona is mainly hidden from view and has little impact upon the Special Landscape area (SLA). Not so for the proposed development which would be visible from all directions and consequently have a disproportionate impact on the scenic area which currently has beautiful views in all directions. The policy EP5 makes a requirement that this type of area should be preserved and protected.

Peebles Community Council strongly suggest that the existing site could be enhanced by developing it in a similar way to that of Springwood Park in Kelso including a hardened area for parking and an indoor venue.

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##### **Eshiels**

Page 323, 324 & 325

**BESH1001** – Peebles Community Council objects to this proposal on the following grounds.

This site was identified by independent consultants commissioned by SBC to identify site options in the vicinity of Peebles. Peebles Community Council have concerns in relation to this report. Firstly, there appears to have been no



attempt to match recommendations with SBC policies. When Policy PMD2 “Quality Standards – Place Making and Design” is considered, clearly, such a development would breach this policy. Secondly the LUC report contains inaccuracies such as the statement that there is a sawmill at Eshiels; this was closed circa 20 years ago. Further, there was little or no engagement with the local landowners in Eshiels. LUC’s report stated “*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. .... there was insufficient time to undertake meaningful engagement with landowners.*” Therefore, this report should be considered insubstantial.

The site is located within the Tweed Valley SLA and this broad valley is the most familiar of the Borders valleys and accordingly it has a strong sense of place. Page 1793 of LDP2 notes that the site is prominent from the approach to Peebles. The valley provides the setting to several settlements and the landscape unfolds throughout 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 alike and the development proposed will not only have a materially detrimental impact upon the SLA but consequently a negative impact upon tourism in the local area. A development here will in effect further urbanise the countryside. Presently, this is open countryside, and its development would have an irreversible impact out of all proportion to its size, including a negative impact upon the local economy. This site should not have been included within LDP2 without a full assessment of all aspects of the likely locational specific economic/tourism, community, and amenity effects of the scheme.

The document ‘*Local Landscape Designations*’ sets out ‘forces for change’ in an SLA and two key forces are clearly identified: development as pressures at settlement edges including commercial development. 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. The location, adjacent to Peebles is sensitive and this development is not compatible with, nor does it respect the character of the surrounding area.

We, Peebles Community Council consider that the proposed site would prove a catalyst for future “ribbon” development along the Innerleithen Road. However, we propose that the old gas works, and recycling centre and its associated and adjacent land would make a more suitable alternative. We feel strongly that brown field sites should always be developed first. Further, any development on the south side would not be prominent in the way that a development would be on the north side.



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**Peebles**

Page 468

**APEEB056** Rosetta Road - Rosetta Road requires a link back to Edinburgh Road. Whilst there is a mention of a new bridge across the Cuddy for the Chapel Hill site, we should re-iterate that proposals for a new bridge at Dalatho are unrealistic. A new approach road joining the A703 is required to the north of the town boundary, north of the Crossburn caravan park. Dalatho Crescent and Dalatho Street are both narrow as is Rosetta Road, which is also currently congested. Existing junctions with the Edinburgh Road are tight and sub-optimal.

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**Peebles**

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**zEL204** South Park – Zoned for Industrial Use – It is strongly suggested that this should be restricted solely to light industrial use. The reason being that the sites are situated immediately adjacent to new and existing housing and that traffic in Caledonian Road, the only access is already congested due to the nature of the road which is effectively a single track road with passing places. Large lorries are often unable to clear the road to allow oncoming traffic to pass.

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**Peebles**

Page 472

**MPEEB006 - Rosetta Road** requires a link back to Edinburgh Road (A703). Whilst there is a mention of a new bridge across the Cuddy for the Chapel Hill site, we re-iterate that proposals for a new bridge at Dalatho are unrealistic. A new approach road is required to the north of the town boundary, north of the Crossburn caravan park. Dalatho Crescent and Dalatho Street are both narrow as is Rosetta Road, which is also currently congested. Existing junctions with the Edinburgh Road are tight and sub-optimal.

Yours Faithfully

Peter Maudsley  
Planning Convener