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**From:** [REDACTED] >  
**Sent:** 24 January 2021 17:46  
**To:** localplan  
**Subject:** Peebles Civic Society Response to LDP2  
**Attachments:** [REDACTED]

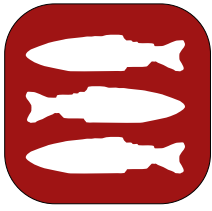
CAUTION: External Email

Please find attached the response of the Peebles Civic Society to LDP2.

Yours faithfully

[REDACTED]

(Secretary, Peebles Civic Society)



Peebles  
Civic  
Society

*"Dedicated to the preservation, improvement and development of amenity in and around Peebles"*

24<sup>th</sup> January 2021

Forward Planning

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

The Peebles Civic Society Committee has carefully read through the LDP2 documents and we comment as follows:

#### **General Points**

We welcome LDP2, including the proposed new and updated policies, and the improved clarity of presentation. We particularly applaud the increased emphasis on placemaking and design in the policy approach throughout LDP2, as highlighted in the foreword by Simon Mountford, and in the introduction to the Placemaking and Design (PMD) policy section of Volume 1.

#### **Volume 1**

**Volume 1 Chapter 4, paragraph 4.9:** We note that the policy objective here prioritises connectivity from Edinburgh to the north, and from Carlisle and Newcastle to the south, with no mention of the importance of connectivity between the three Strategic Planning Areas. We would like to see more emphasis on reinforcing effective transport links between the SDAs, although we note the general support for improvements to key road routes including the A72 and A703 within Policy IS4.

**Volume 1 Chapter 6:** Services and amenities need to be more fully integrated into the planning process. Adequate water, drainage and utility services are currently material considerations for any proposed development. However, the availability of adequate education and healthcare resources in the relevant area should also be material considerations for significant new housing developments.

Local communities should be encouraged and supported to take an interest in their own future development, with initiatives such as the Peebles Town Action Plan, 2016, researched and published by the civic society in partnership with Peebles Community Trust. Such documents, updated regularly, should feed into planning policy.

**Volume 1 Chapter 7, paragraph 7.4:** We are concerned that significant areas of employment land within Peebles have been lost to new housing developments over the years, while there is a continuing demand for central locations for small trade and professional businesses. Some of these are now relocated on the periphery of the town,

where they are less visible and accessible, and this inevitably has created additional vehicular traffic.

We note that paragraph 7.4 states that “It is the role of the LDP policies to ensure that our town centres remain a vibrant focus for communities, not just as retail hubs, but also as service centres. ..Weight must therefore be given to the need to stimulate economic activity in our town centres within the planning application decision making process.” We ask that this consideration should also apply to planning applications that could lead to the loss of employment land within the town boundaries, e.g. change of use to housing, or loss of existing central retail sites. Also with reference to Policy ED3 para 1.5, we ask that small trade businesses be considered as appropriate developments within the terminology.

**Volume 1 Chapter 8:** contains important material relevant to the Climate Emergency and the need for sustainable development to be considered in all planning applications. We welcome the following statements in LDP2:

- *“Developments should ... reduce the need to travel by car ... include clear and direct links to public transport nodes. These matters will continue to be embedded into LDP policy” [Volume 1 Section 8.4]*
- *“The Local Housing Strategy (2017-22) also has a requirement to consider and address housing’s contribution to Climate Change.” [Volume 1 Section 8.6]*
- *“the Council will apply the following sustainability principles which underpin all the Plan’s policies” [Policy PMD1]*
- *“The aim of the policy is to ensure that all new development, not just housing, is of a high quality and respects the environment in which it is contained” [Policy PMD2]*

As SBC recently declared a “Climate Emergency”, these words should appear within LDP2, Chapter 8. However, we look to the Council to action the objectives within Chapter 8.

**Policy PMD2:** We very much welcome the reinforced policy objectives for higher standards in placemaking and design going forward. Considering the disappointing design quality of some recent approved developments in our area, we would ask for more planning briefs to be prepared for development sites within LDP2, and more rigorous attention to be applied in assessing the design quality of planning applications from large housing developments down to replacement windows, to ensure that the higher quality objectives can be achieved.

## **Volume 2: Settlement Profile Peebles**

**Page 466 paragraph 3:** Update the text “the Eastgate Church” to “the former Eastgate Church”.

**Page 467 paragraph 1:** amend the last sentence “Tweed Green and Ninian’s Haugh are the most significant areas but there are others” so that it also includes Hay Lodge Park, Victoria Park and Whitestone Park as significant green spaces bordering the Tweed; and the old wording in the **third paragraph** should be deleted and/or incorporated into the above.

**Page 467 paragraph 5:** LDP2 acknowledges the capacity of Tweed Bridge, which limits further development south of the Tweed. However, it fails to mention the limited capacity of the mini-roundabout by the Old Parish Church, which should be considered

as an integral part of the capacity of Tweed Bridge. The impact of new developments north of the river on the capacity of Tweed Bridge should also be included in traffic assessments.

**Land south of Chapelhill Farm (150 homes) [APEEB056]:** The significant issue with this site is access and the potential increase in traffic along Rosetta Road, particularly considering the indicative site capacity of 150. This development should be **expressly** conditional on a new access link road to be created direct to the A703, immediately to the north of Crossburn Caravan Park, and **not** the proposed bridge at Dalatho. We object to the proposed Dalatho bridge which would worsen, rather than relieve, the potential congestion and road safety issues on the narrow northern section of Rosetta Road, and bring an unwelcome traffic burden to the residential streets of Kingsland Road and Dalatho Street (currently a one way street). We suggest an early feasibility study into a new northern access link road, along with the required planning brief for the site, so that this can inform any future application.

**Rosetta Road (30 homes) [MPEEB006]:** Again we find issue with site access and the potential increase in traffic along Rosetta Road. This development should also be conditional on a new access link road direct to the A703 as for APEEB056 above, and **not** the proposed bridge at Dalatho.

**Rosetta Road (100 homes) [APEEB044]:** We are aware of the current planning consent that requires a bridge at Dalatho. However, should a fresh application be submitted, the same concerns as above apply regarding site access and the potential increase in traffic along Rosetta Road, and therefore this development should also be conditional on a new access link road direct to the A703 as for APEEB056 above, and **not** the proposed bridge at Dalatho.

**George Place (36 homes) [APEEB031]:** This site was formerly a garage workshop and no progress has been made on the housing development option for more than 15 years. APEEB031 is in any case to be linked to redevelopment site RPEEB002, which is in the same ownership. If APEEB031 was redesignated for redevelopment (with the owner's agreement), this might open up other employment options including small business units. We appreciate that this would reduce the housing land supply figures.

**March Street Mill (70 homes/Mixed Use) [MPEEB007]:** This was an industrial site and the development proposed by the owners would again add a large number of properties with the same issues as highlighted above.

The ongoing application by Peebles Community Trust (PCT) for a Community Right to Buy (CrTB) is still active, but is not mentioned in LDP2. The mixed development planned for this site, the need to encourage local employment within Peebles and the ongoing involvement of the local community indicates how local needs should be fully involved in any future development of this site. LDP2 needs to be updated to reflect this.

**Ballantyne Place [addition to LDP2]:** We propose that the present amenity space in Ballantyne Place should be designated as protected green space and stated as such within LDP2.

**South Park [zEL46 and zEL204]:** Due to the restricted access along Caledonian Road and Tweed Bridge, we strongly feel that this site should be designated for light industrial use only.

**Dovecot Road [RPEEB001]:** If there is a change of status of this site from its current light industrial use, it is imperative that alternative and improved accommodation for

the existing small businesses is provided within the central area, and that they are fully involved in any decisions.

**South west of Whitehaugh and northwest of Hogsbridge [SPEEB003/SPEEB004]:** We note these proposals and the fact that no development will take place until a second Tweed bridge is built. The indicative capacity is not stated, but any development needs to be done in conjunction with the points raised above about the capacity of local services.

**Peebles East (South of the River) [Volume 2 SPEEB005]:** The proposed longer-term mixed use of this site would not happen until a second bridge has been built. We would also suggest that there needs to be a planned limit to the eastwards expansion of Peebles along the River Tweed, to prevent further ribbon development towards Cardrona. This development might well go beyond what is acceptable.

## **Volume 2: Nether Horsburgh [SCARD002]**

We strongly object to this totally inappropriate development. This site currently accommodates the annual Agricultural Show, which is a hugely important socio-economic event not for just the local area, but the Scottish Borders more generally. We are amazed that is not mentioned in LDP2, despite this being raised in the response to the MIR. Despite what is stated in the LDP2 report to Council dated 25<sup>th</sup> September (pp1006-1010), there is no suitable alternative site for the event, which was relocated here because of the damage it caused at the SBC-owned Hay Lodge Park.

The proposed development would have an alarming impact on the Tweed Valley Special Landscape Area. Its situation adjacent to the A72 makes any development very prominent in the landscape and seems to contravene Policy EP5. It would be separated from Cardrona Village by the Tweed, a golf course and the A72, essentially creating a new village, and another bottleneck on the A72. In our view, this would not be a coherent or holistic development. The Council's landscape response in the MIR states that *"If a Masterplanning exercise can demonstrate that this site on the north side of the A72 can successfully be connected to the Cardrona settlement on the south... and that a scheme of mitigation planting would avoid diminishing the quality of this part of the Tweed valley SLA, this site has potential.."* We argue that the inclusion of this site within LDP2 is premature, without a comprehensive feasibility study to prove that the "idea" is workable from all aspects. The Council appears to have ignored all community concerns and interests in this instance.

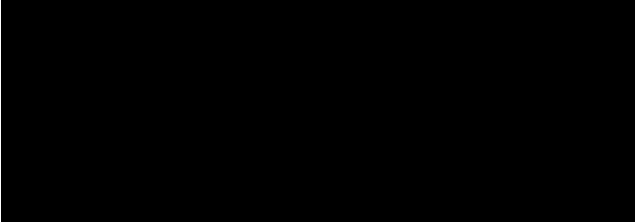
## **Volume 2: Eshiels [BESHI001]**

We strongly object to this business and industrial development proposal on a prominent greenfield site. This development would impact greatly on the Tweed Valley Special Landscape Area and is completely inappropriate in its location and scale. This part of the Tweed Valley SLA currently forms a prominent approach to Peebles (as stated in LDP2) and will be ruined by this further industrialisation of the countryside. We believe strongly that this development will likely lead to future pressures to develop land along the north side of the A72 towards Glentress.

The impact assessment and consultation process leading up to the allocation of this site has been non-existent. The original MESH1001 and MESH1002 mixed use sites in the MIR were removed from LDP2 due to the negative consultation responses received, but it appears that this site, with a different proposed use, has been summarily added to LDP2

as a mere afterthought. However, the inclusion of BESH1001 raises many of the same issues and we strongly oppose it. Alternative sites, such as the land to the south east of the existing depot and recycling centre, should have been properly considered before looking at an isolated greenfield site on the opposite side of the road.

Your faithfully



(Secretary, Peebles Civic Society)