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Sent: 24 January 2021 11:49
To: localplan
Subject: Representations in relation to the Proposed LDP

CAUTION: External Email

GENERAL ISSUES

To begin with, I don't think that any more land needs to be allocated for housing at this time, outwith exceptional circumstances.

The LDP is premised on an expected population increase 2018-2026 of 1.3%, and an increase in households of 3.8% (2,084), so I'll split my reasoning into those two parts :

1) POPULATION GROWTH

In 2018 population growth was already slowing, due to a stalled increase in life expectancy (The Lancet, 2018) and a low and declining natural fertility rate (1.37 in 2019 - 2.1 is replacement level). So the only way the region's population might increase 2021-26 is through net immigration, and there's little sign of that.

Plus the figures used come from before final Brexit and the pandemic. I'll come to the pandemic below, but population will almost certainly decrease as a result of Brexit (1.3m EU citizens had already left the UK by 2018), unless future trade deals open the UK to more immigration from non-EU countries.

A Borders' population decline is likely in the short term, and almost certain in the longer term. Allocating new housing land based on population growth therefore seems counterintuitive.

2) INCREASE IN HOUSEHOLDS

The LDP states, 'The Council is required to maintain an effective 5 year housing land supply at all times'.

A 5-year supply at current rates is around 1500 houses. Indeed, the Housing Land Requirement for 2012-2030 is estimated at only 7300 (section 6.2). Yet there is existing provision for more than 9000 houses (Table 4). On a net basis, then, the region doesn't need more housing land allocated before 2030; developers are already sitting on ample land banks. And demand for new housing is anyway likely to be lower than the LDP's assumptions, because of falling population, Brexit and the pandemic.

With the future so uncertain, it would be better to pause and reexamine the situation when it's time to draw up the 2026-30 LDP and things are clearer.

The only ways that demand for housing might increase in the short term are if :

- a) older people, as the LDP suggests, want to live in smaller households - which would lead to only a temporary increase before a long-term decline, and could be managed anyway using existing land banks, or
- b) there's significant immigration into the region in the near term - which looks unlikely.

Therefore there's little call to condemn the region to yet more housing sites.

THE PANDEMIC

The LDP acknowledges coronavirus (2.7-2.8), though naturally doesn't take account of it in the figures. Its aftermath will only reduce housing demand relative to pre-pandemic levels, both directly (through those sadly lost to the disease, or left too incapacitated for independent living) and indirectly (through personal debt, lost jobs and savings, and poorer prospects in the anaemic economy afterwards). The aftereffects are likely to last for years (we still haven't recovered properly from the Financial Crisis 12 years ago).

TOWN CENTRES

I'm encouraged by the 'town centre first' approach (7.1), though this seems to be an attempt to correct the damaging

effects of previous LDPs which endorsed out-of-town shopping facilities.

I hope SBC is investigating what Kelso and Peebles (retail vacancy rates around 6%) are doing right that the rest of the region's towns (retail vacancy rates around 14%) aren't. Perhaps full-time opening for council-financed facilities (eg. local libraries) in town centres would be a good start.

NATIONAL PARK

I get the impression that SBC is somewhere between lukewarm and unsympathetic to a proposed Borders National Park. Section 8.15 seems to indicate a chicken-and-egg situation between the Council of Ministers and SBC. A National Park would certainly get my vote, would encourage tourists to the region, and would have prevented some of the more egregious developments in recent times. I urge SBC to be more supportive.

TRANSPORT

Figure EP12a - I'm pleased to see that the Earlston to Leaderfoot multi-use path is scheduled for completion. At present its southern terminus is in the middle of a perilous nowhere on the A68.

ELECTRIC VEHICLE CHARGING POINTS (STANDARDS) - When I raised the issue of provision for these being part of the forthcoming Dingleton Road changes (20/00149/RCC), the suggestion was rejected. In light of the requirements within this LDP, I hope that decision will be revisited.

SITE ISSUES - GENERAL

The LDP's introduction states that its 'policies are intended to protect and enhance the Borders built environment and natural heritage'. One of the Planning Dept's remits is to safeguard the Region from unsuitable planning decisions, yet I'm sure most residents can point to development sites where this has been questionable from draft-LDP to final planning permission (in my case The Croft in Melrose (EM4B), which I'll come to).

There are many positive phrases : 'The mix of house types...' (2.9), '...protecting the built and natural intrinsic qualities of the Scottish Borders' (2.18), 'The built and natural heritage are major component parts of the attractiveness of the Scottish Borders which must be protected and enhanced' (4.6). Yet the estates built recently in the region have tended to be homogenous, monotonous developments bolted onto otherwise varied and attractive settlements. I'd like to see new housing having to conform a lot more to the local vernacular, so that it might indeed enhance the built heritage.

The loss of any greenspace around a settlement is to be regretted and resisted (EP11). Greenspace has been shown to have a positive effect on people's mental wellbeing, yet almost all of the proposed development sites would replace greenspace.

There's an insistence throughout Volume 2 that buffer areas and landscaping of new site boundaries can compensate adjacent properties for the loss of their open views. This is misleading. The resultant compressed view compresses the viewer, and once an open view is lost, it's lost forever.

4.10 states that 'The Central SDA...is the primary area for future growth'. SBC seems to have a long-term determination to convert the area into an unrelenting suburb, and this LDP does nothing to slow that process. Please reconsider this strategy, and allow the area to retain the amenity value which makes it so special, in line with the Tweed-focussed Strategic Green Network (Policy EP12, Plate EP12a).

It isn't appropriate for this LDP to be allocating new sites in a settlement where existing sites haven't yet been developed, because the negative impacts of previously allocated sites might only become apparent when they're actually completed.

SITE-SPECIFIC ISSUES

Darnick (ADARN005) - Darnick has been disproportionately smothered by development, with two recently completed sites beside the bypass. This latest proposal would adversely impact the Conservation Area, and should be removed.

Eildon (AEILD002) - Eildon has suffered from piecemeal development for many years, losing its rural character plot by plot. This proposal should be removed.

Foulden - The introduction mentions the village's 'stunning setting', and then proposes development which would destroy part of that setting in the medium term by building to the south. The proposal should be removed.

Galashiels (AGALA029) - Sir Walter Scott developed Abbotsford, now a major tourist draw for the region, as a holistic entity within its environs. This development would breach Policy EP10 and 'adversely affect [Abbotsford's] special character' (1.1). Its view should be safeguarded, and this development removed.

Gattonside (AGATT007) - Gattonside has endured significant developments over the last two decades, and this would be a development too far. The St Aidan's property is conspicuous from the south and particularly from the Eildons. What is at present an imposing building surrounded by attractive greenery would be ruined by plonking a housing estate around it. The proposal should be removed.

Leitholm (BLE2B) - This development would change the historic linear character of Leitholm into something more amorphous, breaking the village's cohesion as well as marring open views to the south for half the existing properties. The proposal should be removed.

Lilliesleaf (ALILL003) - Like Leitholm, a varied linear settlement whose character would be damaged by new developments. The proposal should be removed.

Maxton (AMAXT001 and AMAXT002) - Both of these proposals would ruin open views southwards from existing properties and block the winter sun too. The proposals should be removed.

Melrose (EM4B) - The Croft - I've made my views known in several submissions over the years (indeed, decades) concerning this site and its unsuitability for development. Its designation as development land, and more recently planning permission, were controversially passed in the face of much fierce local opposition.

The section on Eildon village states that 'Development to the west of Eildon should be resisted because the road forms a clear boundary and beyond that there are open fields that form the foothills of the Eildon Hills.' Well the Croft site actually forms part of the Eildon Hills, and is also bounded by a clear road, so it's unjust that this site didn't receive the same consideration.

The development site takes an blatant chunk out of the Countryside Around Towns designated land (EP6), damages a National Scenic Area (EP4 - 1.3), runs counter to Cllr Mountford's introduction ('...policies are intended to protect and enhance the Borders built environment and natural heritage'), contradicts 4.6 ('The built and natural heritage are major component parts of the attractiveness of the Scottish Borders which must be protected and enhanced'), EP11 (Protection of Greenspaces), the HOUSING DEVELOPMENT introduction ('...whilst also safeguarding the attractive Scottish Borders landscape...'), and is directly above and abutting on an SSSI, which will suffer inevitable damage. How this site even made it to draft-LDP in 2001 is incomprehensible, and that it was recently granted full planning permission I think discredits the whole Planning process.

Thankfully nothing has yet changed on the ground, despite it being allocated for housing nearly 20 years ago. I urge SBC to withdraw permission for this development and protect the site from future housing.

Melrose (EM32B) - Dingleton Hospital - Any new development proposals on this site should be treated with caution, after permission was given to build the visual blemish on the landscape which is the Harleyburn development (a white smear from anywhere west by day, a permanent patch of light against the dark hills by night). The Scottsdale development further up is relatively acceptable in scale and visual shielding.

Melrose (AMELR013) - This proposal is deplorable. It's on an NTS site of high landscape value, beside the old Mill Lade (a scheduled monument), has an orchard of long-established apple trees, and is a greenspace much-used during the Borders Book Festival. Locals, many of whom use the site as a route between town and the river bridge, have only just seen off a horrible blimp proposal adjacent to this site, and are now being confronted with this. As well as being within the Conservation Area, the proposal seems to contravene Policies EP6-EP12 inclusive, and presumably more. The proposal should be removed.

Newstead - the LDP doesn't include the central building plot, which I wanted to object to under EP11 (greenspace within conservation area), as it's the only significant greenspace in the village centre. Please cancel permission for this development.

Sprouston (RSP2B) - To have the notable church inundated by modern housing seems insensitive, where it now enjoys a relatively open setting.

Swinton (MSWIN002) - This would marr what is currently an open rural view south and west from the school. The compression of outlook must adversely affect the mental wellbeing of the schoolkids once construction is complete, and even more so during the construction phase. The proposal should be removed. I would have objected to Ayton's AY1A site on the same grounds, but StreetView shows that development here has already begun, so it's sadly a lost cause.

Tweedbank (MTWEE002) - The Lowood site, much as I would wish it to remain undeveloped, would alone supply the alleged Borders' housing demand for a year.

CONCLUSIONS

I hope my representations are clear. My fundamental objection is that there's currently no reason for any more land to be allocated for development, except in unique circumstances, due to ample site supply and an expected falling off in demand.