

[REDACTED]

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**From:** [REDACTED] >  
**Sent:** 25 January 2021 08:20  
**To:** localplan  
**Subject:** Individual response to LDP2  
**Attachments:** [REDACTED]

CAUTION: External Email

Please find attached my individual response to LDP2.

Yours

Anthony Newton

25<sup>th</sup> January 2021

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This is my personal response to the LDP2 sent via email.

I appreciate the opportunity to look through the proposed development plan and think that it is well-laid out and I agree with the sentiment of place making as set out in the **Placemaking and Design** section and also by [REDACTED]. I also welcome the reduction in proposed housing for the Peebles area compared to the MIR and recognition that there are limits to the amount of further development due its confined topographic location.

### **General Points about Volume 1**

Living in Peebles, it is evident that local services such as health care and schools are stretched and it is hard to justify and further large scale developments until these problems are addressed. I would dispute any suggestion from the Council that there is capacity for further growth. This has been made abundantly clear by GPs for example. Proper consideration of the capacity of local services and amenities to cope with an expanded population needs to be considered as part of every development. These services need to be expanded before development occurs, not the other way round. This in particular relates to what is written in **Volume 1 Section 6** and to all the proposed Peebles and surrounding area proposed developments in **Volume 2**.

Whilst the public consultation of LDP2 is good, a lot more support and guidance should be given to local communities to create their own vision for their areas. The creation of Town Plans is complicated and local communities across the Borders should be supported and advised in how to put these together. This would really be local placemaking and should be included in the **Placemaking and Design (PMD)** section.

I am pleased that the SBC eventually declared a **Climate Emergency** last year and recognise the points made in **Volume 1 Section 8** addressing **Climate Change** and the Council's commitment to **Sustainable Development Goals**. However, the word Climate Emergency does not appear anywhere in LDP2. Declaring a Climate Emergency means that it must now become central to everything the Council does and I am not really convinced that this is the case. Mitigating the impact of any development on climate change needs to be much clearer

than is set out in many of the proposed developments in LDP2. The whole strategy of building more houses for people to commute to Edinburgh to work is simply not sustainable, no matter how good public transport is. This is a fundamental flaw in the much to expand places like Peebles. The Council must ensure that the objectives as set out in Volume 1 Section 8 are actually implemented. To this end, it is essential the that loss of employment land in Peebles is reversed. This problem is acknowledged in **Volume 1 Section 7.4**, but I am not convinced it is a priority and it is certainly not acceptable to suggest isolated industrial/business developments on greenfield sites such as Eshiels. Too many previous employment sites have been given over to housing and this should stop. The proposed March Street Mill (**MPEEB007**) site is a good example.

Some of the recent developments around Peebles are of disappointing design quality and I would highlight the South Parks development as a good example. This is at odds with the statements set out in **Policy PMD2**. A lot more attention needs to be made to the quality of design when considering planning applications from the whole development and to individual houses. As the description of Peebles points out, the “The settlement and its hinterland are of high amenity value...” and SBC should ensure that this continues with good design throughout. This is simply not the case at the moment. Also, I am disappointed to the minimalist approach to **Sustainable Urban Drainage** seen in recent developments. SUDS should be fully incorporated into developments with source controls, swales, retention and detention basins forming treatment trains. The end of pipe solutions found in developments such as South Park are not best practice. This is a problem seen in many developments and councils have the power to rectify this and should stand up to developers who want to do the minimum. This will make future developments more sustainable and show some actual commitment to **Sustainable Development Goals** set out in LDP2.

### **Settlement Profile Peebles**

Under **Key Infrastructure Considerations**, some of the limitations to further development are stated and I agree with issues such as Tweed Bridge and the limit to development posed by its limited capacity. However, LDP2 fails to recognise that the mini roundabout by the Old Parish Church needs to be integrated into the Tweed Bridge capacity and also the impact of developments north of the Tweed. Also, some of the past calculations of the capacity of Peebles residential streets have been ridiculously over estimated. For example, Caledonian Road stands out. A much more honest and justifiable methodology needs to be applied to these calculations. I recognise that large scale development south of the river will not occur until a second bridge is built, but even then I question the philosophy of constant eastward expansion along the River Tweed as set out in SPEEB003/SPEEB004/SPEEB005. This suggests a ribbon development, which does nothing for the “amenity” of the area or the sustainability of development.

I am concerned by the large number of proposed houses planned for north of the river. In particular, Land south of Chapelhill Farm (150 homes) [**APEEB056**], Rosetta Road (30 homes) [**MPEEB006**], Rosetta Road (100 homes) [**APEEB044**], George Place (36 homes) [**APEEB031**] and March Street Mill (70 homes/Mixed Use) [**MPEEB007**]. In total, these will put an immense strain on local services such as health and schools. Traffic would also increase along Rosetta Road and March Street and these residential streets are not designed to cope with this. In many places, Rosetta Road is a single lane road due to parking. I disagree that

these problems will be solved by building a bridge at Dalatho. This would create its own problems for Kingsland Road and Dalatho Street and still lead to increased traffic on the northern part of Rosetta Road. If any new northern developments are approved, a bridge north of Crossburn Caravan Park should be built first, before any consideration is given to a bridge at Dalatho. Despite this, these developments would still lead a large increase in traffic along Rosetta Road and March Street and I am at all sure that they really sustainable.

I was surprised to see no reference in the proposed mixed use development of the March Street Mill [**MPEEB007**] site to the ongoing application by Peebles Community Trust (PCT) for a Community Right to Buy (CrTB), which is still active. This is a great example of local Placemaking and it is disappointing to see the Council ignoring it. This seems like a blatant omission to me and should be rectified.

### **Settlement Profile Eshiels**

This is the opening paragraph that introduces the Eshiels on page 323 *“Eshiels is located in the heart of the Tweed Valley Special Landscape Area. The character of Eshiels has been established particularly by its layout and setting – it is located where the lower slopes of Cardie Hill and Falla Brae slope down to meet the River Tweed.”* What then follows seems to trample all over this. I am shocked by the proposed business and industrial development **BESHI001**.

I fail to see how this isolated business and industrial development in a greenfield site in the Tweed Valley Special Landscape Area fits with any of the statements made about Placemaking, Sustainable Development and the need for employment space where people actually live. This development is completely inappropriate for this location and will be highly visible to what is stated in LDP2 as being a prominent approach to Peebles. The proposed developments in the MIR (MESHI001 and MESI002) have been dropped and replaced by a proposal to build in a new location without any impact assessment or consultation. The site is prone to flooding, which means it temporarily stores water and should not be considered for development. No consideration seems to have been made to the impact on tourism, with Glentress nearby. This area should keep its rural setting, with the current scattered houses. I completely fail to see any logic to this development and I strongly oppose it and any other developments in this area *“at the heart of the Tweed Valley Special Landscape Area”*. It just does not make sense.

### **Settlement Profile Cardrona**

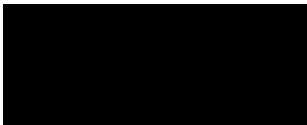
The proposed longer-term development at Nether Horsburgh [**SCARD002**] is a terrible idea. Much like **BESHI001**, it flies in the face of statements elsewhere about Placemaking, Sustainable Development and actually caring about the Tweed Valley Special Landscape Area. Any development here would be very prominent and not hidden, as Cardrona village currently is and contravenes Policy EP5. The proposal even includes scope for the rerouting of the A72 through the development, which would add to the impact of the development.

This would not lead to an expansion of a coherent settlement, as the Nether Horsburgh is separated from Cardrona by the A72, the River Tweed and a golf course.

To add to the problems with this site, and a blatant omission from LDP2, is that it is the current successful home of the annual Peebles Agricultural Show. This was highlighted in responses to the MIR, but has been ignored. The Agricultural Show is very important socially and economically to not only the Peebles area, but also the wider Borders. This location was chosen as an alternative to having the show in Hay Lodge Park, owned by the Council, due to the damage done to that site. Although is no other suitable site, despite what is stated in the Council's LDP2 report dating the 25<sup>th</sup> September 2020.

There has been no comprehensive feasibility study to show that this proposal would be workable and the Council seems to have ignored all community concerns about this alarming development. This should be removed from LDP2.

Yours faithfully

A solid black rectangular box used to redact the signature of Anthony Newton.

Anthony Newton