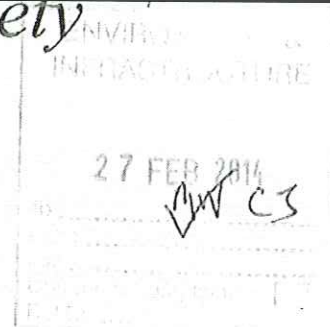


# Peebles Civic Society

*A society dedicated to the preservation, improvement  
and development of amenity in and around Peebles*

Plans and Research Team  
Council Headquarters  
Scottish Borders Council  
Newtown St Boswells  
Melrose TD6 0SA



Dear Mr Wanless

26 February 2014

## Scottish Borders Local Development Plan: Proposed Plan.

We thank you for the invitation to review and respond to the Proposed Local Development Plan. On behalf of the Peebles Civic Society I set out our views and concerns as they apply to our town of Peebles.

### Volume 1 Policies

#### Appendix 2 Meeting the Housing Land Requirement

Windfall pressures on the planning system specially in relation to Peebles.

Section 2 Housing land supply need and demand assessment (HDNA) in relation to the LDP Proposed Plan for the whole region of the Scottish Borders concludes in table 2 that there is a surplus of 2093 units for the period 2009-2019 reducing to a surplus for the period 2019-2024 of 826. We note that included in these figures there is a windfall assumption of 1169 for years 2009 – 2019 and 730 for years 2019 – 2024. We note that from table 3 the 5 year average percentage completions from 2008 to 2012 are 503 of which 229 are windfall, a percentage of some 46%. We are concerned about this high percentage of windfall sites to planned sites as this demonstrates a weakness in the planning system.

At present in Peebles we are currently confronted with two planning applications due for 34 and 130 houses amounting to some 164 houses that are considered as windfall sites being extra to the allocation in the current Local Plan. We are aware that the housing land requirement for Peebles has already been met for the current planning period. Bearing in mind the new sites allocated for Peebles in table 5 amount to 75 out of a total of 105 for the Western Strategic Development Area the vulnerability to excessive windfall development is unreasonable.

We further refer to table 2 where the expected contribution by windfall for the whole region for period 2019 –2024 is 730. If the two planning applications referred to above are permitted, then the percentage contributed by windfall sites by Peebles alone would amount to 22.5% of the whole region's allocation.

We refer to the SESPlan Main Issues Report chapter 8 paragraph 8.98 that specially refers to the future development pressure on Peebles: ***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.***

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We feel that we are bearing an unreasonably high proportion of windfall development and that tight control must be adopted for the future of Peebles in order to properly manage the future growth of the town.

If one of these prospective windfall sites is given planning consent during the adoption period of the Proposed LDP then one of the safeguarded sites should be moved to the following planning period.

## Volume 2

### **Settlement Profile for Peebles Housing**

Housing sites TP7B and TP200. We see from the indicative site capacity tables for site TB7B Whitehaugh II that the indicative site capacity is given at 106 whereas in the 2012 Housing Land audit this site has 214 recording the actual number of houses given planning permission. Similarly site TP200 Violet Bank I has an actual consent of 57 houses instead of the 40 listed in the site capacity table.

For the potential longer term mixed use sites south of the river we note that the requirement for a second bridge is demanded. However the potential here is for a considerable number of houses, over 550 using only 20 of the 32ha of site SPEEB005 giving 400, site SPEEB003 South west of Whitehaugh giving 100 and SPEEB004 North west of Hogsbridge 50 at the density presently adopted for the Whitehaugh phase II site.

The potential for over 550 houses will place an undue burden on the current infrastructure of Peebles and we suggest that before any of these sites are brought forward for development and the second bridge decided that a whole town master plan addressing all infrastructure issues and the resulting effect on the town centre is undertaken.

We are still concerned about the increase in traffic on Caledonian Road in respect of the allocation for housing for site APEEB021 South of South Park and Rosetta road for site APEEB041 Violet Bank II.

### **Business and Industrial Safeguarding**

We are concerned that there is a shortage of employment land available in the short term to provide for more local employment to satisfy the projected increase in the population of Peebles. Sites zEL204, zEL2 and zEL46 are already fully used for business. The only indication of future provision for business is in the long term mixed use site SPEEB006 which is well past the proposed planning period to 2024.

We note that site RPEEB001 Dovecot Road is listed for redevelopment. We presume that this will remain for business and industrial use.

### **Key Greenspace**

We are pleased that the listed Greenspace sites are being safeguarded.



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