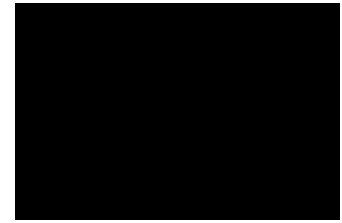


Planning Policy and Access Team
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10 December 2018

Dear Sir/Madam

Local Development Plan 2: Main Issues Report

I am writing in connection with the consultation on the Main Issues Report (MIR) and would like to share my views with you on the future direction for planning in the Scottish Borders. As you probably know, I am in the process of researching the history of town and country planning in the Borders for a proposed book; my attention at the moment is devoted to the period prior to 1975 when the former county councils prepared the first development plans for the area and concentrated their efforts on stemming rural depopulation and attracting industry to offset the slimming down of the textiles industry. During that time, central government played an important part in framing the future pattern of development in the Scottish Borders through the Central and South-East Scotland Plan and the Central Borders Study of 1966, which established the principle of major housing and industrial development at Tweedbank. After 1975, the Borders Regional Council took up the challenge and over-saw the end of 100 years of population decline in the region and achieved a steady growth in population based on the diversification of employment and the attraction of workers to the area. Economic development was the cornerstone of this recovery, combined with an improved road transport network and housing provision. Since 1996, the main driving force would appear to have been the need to accommodate an increasingly buoyant housing market with only incremental increases in employment land provision. In recent years there has been a significant reduction in house building and sustainable development is now the watchword.

We now seem to be in an era of short-term solutions, partly driven by the need to review local development plans on a five year basis; but this is about to change. In relation to question 1, I should like to see more long-term thinking in the vision, aims and spatial strategy of the local development plan. Following the 1975 re-organisation of local government, the aim was to fully integrate all parts of the Borders Region; to make Berwickshire and the east coast communities, as well as Peeblesshire, part of the Scottish Borders Community. The spatial strategy in the MIR identifies three growth areas but there seems to be little emphasis on any requirement to improve links between them. Reference is made in the MIR to connectivity with Edinburgh and with Newcastle and Carlisle and on improvements to the A68 and A7 (as well as to the extension of the Borders Railway) but there is no mention of improved connectivity between the central hub and the eastern and western parts of the region. The need for improved 'East-West' communications has figured in development plans since the days of the county development plans and although improvements have been made east of the A68 on the A699 and the A6105 and between the A68 and A7, the A72 remains the weakest link. My experience of this road is that there is a substantial amount of commuting between Peebles and the Central Borders in both directions. It is a busy tourist route in the summer months. Further improvements would be welcome.

Peebles is identified for substantial growth with a number of potential sites south and north of the river, which will only increase traffic on the A72 (as well as the A703). Facilities in the Tweed Valley Forest Park, principally at Glentress, continue to expand. I think the local development plan should be more aspirational in its approach (the first Peeblesshire County Development Plan included a bypass for Walkerburn and Innerleithen, which continue to create bottle-necks on the A72). If Peebles is to continue to expand, what does this mean for the road infrastructure both east and north of the town. Consideration should be given to further improvements to the A72 between Peebles and Galashiels. Perhaps there are insurmountable problems in Midlothian, but it has always surprised me that more attention has not been given to the possibilities of re-instating the railway link between Peebles and Edinburgh, taking account of the amount of traffic using the A703 and the continued growth of Peebles as a residential and tourist town.

As regards the location of future growth in Peebles, unfortunately I was unable to attend the Peebles workshop and hear the discussion there. The adopted local plan identifies potential longer term housing sites (subject to review) south west of Whitehaugh and north west of Hogbridge, and a potential longer term mixed use site at Whitehaugh, all depending on the provision of a new bridge. The MIR offers another housing site (east of Cademuir Hill) and a mixed use site west of Edderston Road. The alternative to development south of the river seems to be mixed use development at Eshiels and/or Cardrona. The council's position over the prospects for a second bridge over the Tweed is unclear, (the adopted local plan simply refers to this as a possibility). Is the council in favour of a new bridge to allow development on the south side or not? Does it prefer housing on the south side or the north side (at Eshiels and/or Cardrona?). If future growth is to be located on the north side of the river, development at Eshiels, alongside Glentress, would seem logical, if flooding is not an issue and basic infrastructure can be provided. A mixed development at Nether Horsburgh might have greater landscape impact but would assist in establishing Cardrona as a more sustainable community. I suspect that many people from Peebles/Cardrona travel to the Bush area, north of Penicuik; might there not be possibilities for satellite agri-forestry research/businesses in Eshiels/Cardrona, where the Forestry Commission has a major interest.

As regards the economy of the Scottish Borders, the safeguarding of business and industrial land should continue to be a priority for the local development plan. I endorse the sentiment in the MIR that it is vital that the LDP2 provides a healthy supply of readily available land for business and industrial use. This applies, no more so, than to the Central Borders. In relation to the flexibility of uses considered appropriate to business and industrial sites, at the Galashiels workshop, reference was made to the recent refusal of a proposed gymnasium, soft play area and café in part of the former Plexus Facility at Tweedbank and to the proposed Premier Inn Hotel etc. development proposed for Tweedbank. I would not wish to offer an opinion on these proposals but I note that Tweedbank Industrial Estate is identified in the adopted local plan as a strategic safeguarded business and industrial site, where uses other than Classes 4, 5 & 6 will generally be refused. The MIR suggests a relaxation for both categories of Business and Industrial Sites in proposed policy ED1, to allow other high quality complimentary commercial activity as well as non-industrial business/employment generating uses if they enhance the quality of the business park as an employment location. It could be argued that the proposed Premier Inn Hotel etc. development does just that. For the second category of Business and Industrial site, employment generating uses other than Classes 4, 5 & 6 can be considered where a 'sequential test' has found that no suitable alternative sites are available. As proposed, policy ED1 is capable of wide interpretation and has the potential to allow a range of uses on business and industrial sites, which could be detrimental to the aim of maintaining an effective supply of sites for business/industry. I

would suggest that the preferred option for policy ED1 does not provide clear and robust guidance for future development on business/industrial sites, and could cause confusion for both applicants and decision makers. Perhaps, further consideration should be given to the wording of this policy.

The role of town centres is changing and Galashiels is no exception. The opening of the Borders Railway and the Tapestry development should attract more visitors but far more needs to be done. I walked across the Douglas Bridge from the Interchange recently and was so sadly disappointed at the image that welcomes visitors. Reference is made in the MIR to the Galashiels Masterplan and its identification of potential redevelopment opportunities to help regenerate the town. Whether you include it in the Supporting our Town Centres chapter or the Regeneration chapter, I think there should be a more positive statement on the potential for redevelopment/regeneration in Galashiels town centre and of the measures to achieve this. I was saddened to see that Galashiels businesses (apparently the larger chains) did not support the Galashiels BID for LEADER funding. I see that Hawick is next in line for a CARS and it seems to me that there is a case for a Galashiels CARS. As regards the pilot relaxation of Core Activity Area policy in Galashiels, I am not convinced that this will have any material effect on the vitality and vibrancy of the town centre. I think it will be very difficult to measure what effect this very minor change to acceptable uses on the retail frontages of Galashiels has over a one year period. The retail centre is now concentrated south-east of Market Street (Currie Road/Paton Street/Huddersfield Street), with a subsidiary centre on the Peebles Road. The protection of the retail frontage in Channel Street/Bank Street etc. does not seem relevant anymore and is probably counter-productive in attempting to enhance the vibrancy and vitality of the town centre. I would have no objection to a complete removal of this restriction, as is proposed for Hawick. Having said that, I am not suggesting that such designations be removed in any of the other town centres; Galashiels (and Hawick where Commercial Road could be considered the 'New High Street') are far more complex town centres.

As regards housing provision, the Scottish Borders would appear to be in the fortunate position of having a generous supply of housing land following the approval of the SG on Housing. Any changes to the SESPlan could affect the situation but with the 'dreaded' BREXIT on the horizon it may be some time before house completion rates in the Borders pick-up. The MIR identifies the western area as the one under most pressure and, as stated earlier, I think the council should grasp the nettle and decide on a way forward for Peebles. The MIR also sign-posts the possibility of new settlements in the longer term. In the western area, the expansion of Cardrona at Nether Horsburgh might come into this category; or a larger scale development at Eshiels (I understand that developers do not seem to consider Eddleston a desirable location). For the central Borders, the answer to this question was put forward fifty years ago when the Central Borders Plan highlighted St. Boswells/Newtown St. Boswells, together with Tweedbank, as the locations for major growth. The extension of the Borders Railway southwards to Hawick via Newtown would help facilitate the future expansion of St. Boswells/Newtown.

Can I conclude by saying that I thought the workshop at Galashiels was most informative, largely down to the excellent presentation by Charles Johnston. It was unfortunate that the attendance was not larger. I look forward to seeing the proposed LDP2 in due course

Yours faithfully,

