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From: [REDACTED]
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To: localplan
Subject: Response to the MIR Local Development Plan 2
Attachments: Anthony Newton MIR Response.pdf

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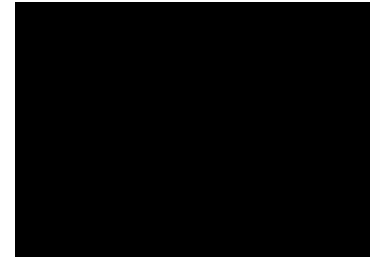
Please find attached my response to the latest MIR and I hope that this makes a constructive contribution to the development of the Scottish Borders Local Development Plan 2.

Yours

[REDACTED]

27th January 2018

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I am writing in response to the Local Development Plan 2 Main Issues Report and I hope that my views are taken into consideration when formulating the new Local Development Plan. My comments mainly concern the housing proposals.

The Scale of the Proposed Developments

Firstly, I understand the need to build more housing in the Scottish Borders and I would like to note the following statements found in the MIR, which I will refer to in my response. I have highlighted key phrases, which I feel the MIR contradicts:

3.3 The LDP2 must incorporate a generous supply of housing land for a range of users. Although there have been limited annual completion rates for mainstream housing, there has been a significant increase in housebuilding by Registered Social Landlords which has offered greater opportunities for affordable units. Given the limited take up of allocated housing sites, the high land supply within the current LDP and the limited number of new houses required for the Scottish Borders within the proposed SESPlan, it is not anticipated the LDP2 will require a significant number of new housing sites.

3.6 The built and natural heritage are major component parts of the attractiveness of the Scottish Borders which must be protected and enhanced. There are a large number of listed buildings, conservation areas, landscape and biodiversity designations and opportunities must continue to be explored to capitalise on these assets in the interests of tourism and economic development. LDP2 must continue to ensure new development is located and designed in a manner which respects the character, appearance and amenity of the area and that good placemaking and design principles continue to be implemented.

3.10 The Central Borders RGA focuses around the main towns of Galashiels, Melrose, Earlston, Kelso, Jedburgh, Hawick and Selkirk. This area has the largest population within the Scottish Borders and is the primary area for future growth. It is at the centre of the roads transportation network and is also served by the Borders Railway and the Galashiels Transport Interchange.

3.13 Within the Western RGA, the main settlements of Peebles, Innerleithen and Walkerburn are located along the A72. The success of outdoor recreational

facilities at Glentress has helped tourism in the area and helps the status of Peebles as a recognised buoyant town centre. Peebles remains a very attractive area for prospective house builders partly due to its proximity to Edinburgh. However, potential flood risk and the need for a second bridge prior to any housing land being released on the south side of the River Tweed limit options at this point in time.

5.9 The sites identified in this document are situated in or around existing settlements. In the longer term it may be that ideas come forward for new 'stand-alone' settlements in high demand areas. Because of the complexity of the work involved in preparing the infrastructure and design of any new settlements, it is unlikely that such sites come on stream in the forthcoming development plan period and so no possible sites have been identified in this document. But the Council is open to well thought through proposals of this kind put forward by developers or landowners so that early consideration can begin.

My main objection to this proposal is the number of sites and therefore houses proposed for the Peebles, Eddleston, Eshiels and Cardrona area. This is by far the majority of new housing proposed for the whole of Scottish Borders, despite the statement about stating that the main growth area is the Central Borders Rural Growth Area. This is a startling contradiction. I understand that you state that more areas and housing have to be proposed, as not all will be built, but why is so much proposed for the Western Borders Growth Zone compared to the area you have identified as being your main area for growth. For this reason I have to reject the overall plan for development in the Western Borders Growth Area.

As well as the sheer number of sites/houses proposed for the Western Growth Area the choice of several sites (e.g. Eshiels and Cardrona) seem to contradict your identification of the Scottish Borders as being special for its landscape and attractive to tourism. These two proposals in particular seem to fly in the face of this, as they would be located prominently in the Tweed Valley and would impact directly on the visitors to tourist attractions such as Glentress, which you identify as being very important. Both of these will also take up valuable agricultural land and will effectively be "stand alone" developments, which you say you are not contemplating. The Eshiels development dwarfs what is already there and the new Cardrona site would be completely separated from the existing village by the main Borders east-west road (the idea of putting this through the new development seems bizarre and is not explained) and the River Tweed.

The number of houses proposed for what is effectively the Peebles area will put considerable strain on the town. One example is car parking, as more people from these local developments will need to drive into Peebles for shopping, to visit GPs, take kids to school etc. Where are these people supposed to park? What about the overstretched primary health care? It was made clear at the public meeting by the people that actually work at Haylodge, that the current setup can simply not cope with the proposed increased in local population (it barely copes now). Peebles High School student numbers are already too large for its inadequate buildings and a replacement school has been pushed back to the 2030s. Primary schools will also find it hard to cope. The amount of traffic commuting to Edinburgh is already very high and this will get far worse, even if some new local businesses are encouraged. Most people will also still work in Edinburgh and most will drive. I fail to see how this is sustainable. There is no train option to help reduce this, as there is in Galashiels.

The Tweed catchment has a long history of flooding and the new proposals also seem to contradict some of the excellent schemes (e.g. the Eddleston Water Project) which are aiming to reduce the flood risk for the area. These new developments, unless very carefully controlled are liable to add to the flood risk, by speeding up the flow of water from the land to the rivers and stream. SEPA are already unhappy with the proposed Kittlegairy 2 development and there is a long history of developers paying lip service to sustainable drainage systems as they try to pack as many houses as possible onto the land. This point applies to all the sites discussed below.

Individual Proposals

My comments above are general about the direction of the MIR, but I have some more specific issues with individual sites which I will list below:

Eshiels (MESH1001/MESH1002): I have mentioned this above, but I am shocked by the scale of the proposed development which will blight the lives of the current Eshiels community. It will also have a huge impact on the scenic character of this beautiful part of the Tweed valley and approach to Glentress, identified above as being a major tourist attraction. These two developments are for a total of 240 houses and are a Preferred option. This creation of a separate development will not only blight the landscape for tourists, walkers, mountain bikers etc, but will also create a lot of extra traffic as people will inevitably drive to Peebles for various services. There are also issues with the distance that school children will have to travel to primary schools and Peebles High School. From what I understand the distance to school means that pupils do not qualify for a school bus. The alternative is an hour's walk (safety issues, weather and time) or being driven (creating more traffic and environmental impacts).

Cardrona (SCARD002): Again as at Eshiels, this development will destroy good agricultural land, create in effect a new settlement separated by a road or the Tweed and will have the same negative impacts as at Eshiels when it comes to transport. The idea of routing the busy (and busier if the developments occur) through the new developments will not only slow traffic travelling through this area down, but be hazardous to the locals too.

South Park (SPEEB008): Again the main objection here is the scale of the development. I am not sure of the number of houses, but comparing to other sites it must more than 200. How is this going to work with Caledonian Road? It makes no sense to anyone who knows this road. It is narrow and cannot be widened. A second bridge is not going to help this situation. It also eats up yet more agricultural, will impact on the beautiful countryside, including protected areas.

Land South of Chapelhill Farm (APEEB056): This is another poorly thought out Preferred proposal. Not only will it impact aesthetically on the northern approach to Peebles, the proposed 150 houses will create many more vehicle journeys and the proposed bridge over the Eddleston Water connecting Kingsland Terrace and Dalatho Street makes little sense. Dalatho Street is a narrow (currently one way) residential road, with a very tight junction with Edinburgh Road. I do not see how this can safely be used. The only safe route would be to build a bridge directly east of the development, but this would presumably be expensive and impact even more on the environment. There will also be a big increase in traffic up and down Rosetta Road.

East of Cademuir Hill (SPEEB009): This Longer Term Preferred Option is in a Special Landscape Area. This development would impact on this beautiful area and destroy

agricultural land (contradicting stated aims). It is also hard to see how vehicles from over 100 houses will be able to negotiate Bonnington Road, going past the High School. The junctions are also not great and will not be helped by extra traffic.

Eddleston (AEDDL008 and AEDDL009): The Alternative, yet very prominent proposed developments at Eddleston could well lead to increased surface runoff, just as the Eddleston Water Project is trying to reduce flooding in the Eddleston Water. These would be very visible developments that would impact on the beautiful countryside around Eddleston. Eddleston also lacks any shops or amenities, leading to more journeys to Peebles. This, increased traffic is bad for climate change mitigation and safety.

Eddleston (SEDDL001): The Preferred option would again potentially increase surface runoff, visually impact of the Eddleston valley and create the same problems as described above regarding amenities and travel to Peebles.

Summary

In summary, I find that there is a disproportionate amount of proposed developments for the Peebles area. I fail to understand how this can be regarded as being a fair distribution of what I admit is much needed housing. You state quite clearly where the main growth areas are and then fail to actually follow this through. This contradiction is so obvious that it is startling. The huge public investment in the Borders Railway was supposed to encourage developments in Central Borders Growth Area, but the MIR completely fails to do this. I hope that the Council reconsiders its proposal and comes up with a fair Local Development Plan that creates much needed housing in the area you identify as the “primary area for future growth”. This needs to be done a way that is sustainable and takes into account the impact that such developments have on the environment, local communities, individuals, amenities and services.

Yours sincerely

