



Dear Sir or Madam,

LDP 2: Main Issues Report.

I wish to provide the following comments regarding the above document. The statements and questions in bold are requested actions to each of which I would appreciate a written response.

1. **General.**

- a. The Foreword to the document specifies that “Our overarching purpose is to encourage new growth and investment”; the document does not explain how this overarching purpose will be achieved, nor does it provide any targets for what that investment and growth could or should be. **These critical elements need to be made available for review and discussion as part of the next steps in the LDP process.**
- b. With regard to Section 1.6, records of the consultations and working group discussions, as well as inputs made by third parties and as submissions regarding potential development sites, should have been made available on the SBC website for review and comment as part of the MIR consultation. Since these have been influential in determining the conclusions reached **this should now happen and an extension of the MIR consultation period beyond January 31st be granted to allow comment by the public.**
- c. With regard to section 1.10, **questions and representations made as part of this consultation should be made available for public review along with answers and/or explanations as to how it is proposed that they be taken into account in formulating LDP2. An opportunity for the public to comment on the Council’s response to these questions and representations should be permitted *before* LDP2 is constructed.**
- d. Section 2.1 states that the population growth projection between 2017 and 2026 is 1,757 (1.5%). Using a ratio of 2 people per house (consistent with section 2.3 data) this would require that between 800 and 900 new houses be provided by the end of the period (not allowing for currently vacant properties). However, section 5.2 specifies that 3,841 houses are required between 2021/22 and 2030/31. **How are these two numbers reconciled?**

- e. Table 2 in section 2.3 shows a 37%+ increase projected in the population over the age of 65. **What is the projected cost of meeting the needs of this growing elderly population and how will it be met?**
- f. It appears from Section 2.3, Table 2, section 2.7 Table 5 and section 2.9 that the working age population is forecast to decline between now and 2026. **Given that unemployment is already low, why do we require more industrial estate space?**
- g. Section 2.9 states that “there is a recognised need to allocate further employment land within the Peebles area in particular and Galashiels.” **Why is this the case if the working age population is forecast to decline?**
- h. Section 2.10 states “The Scottish Borders continues to have reliance upon traditional rural activities focused upon agriculture, forestry and fishing. All of these industries have faced continuing challenges to their competitiveness with a consequential impact on the viability of the rural area.” **Please provide the facts and data which demonstrate the “consequential impact on the viability of the rural area” and provide evidence that the challenges in this sector are worse than those being faced by others.**
- i. Section 2.13 states that “The role of town centres is changing and different measures need to be considered to keep our town centres viable and vibrant.” **To support a meaningful consideration of this matter and recognising that the approach may be different for different towns, each Community Council should be given the opportunity to submit plans for their district which, following review and discussion, should be included as part of LDP2. For its part, SBC should look to its options to provide supportive finance for these proposals, such options to be presented within the draft LDP. If finance cannot be found, measures which require finance should not be included in the LDP.**
- j. Section 2.14 states that “New housing allocations can put a strain on education provision in some school catchment areas. However, given the limited number of houses required within the LDP2 period for the Scottish Borders as stated within the proposed SESPlan, it is not envisaged this should cause major insurmountable issues, although further investigation must be carried out regarding proposals within the vicinity of Peebles.” **Establishing the capacity of education providers should, if not already known, not be difficult to achieve; obtaining facts and data from local schools should be relatively straightforward. This fact-finding should not be limited to schools but should be extended to nurseries (public and private), health facilities and other centres of public provision (for example, sports halls and swimming baths). The facts and data should be obtained along with impact-assessments from the providers and all of this information -including the provider inputs – be made public ahead of the compilation of LDP2.**
- k. Sections 2.16 – 2.22, Compliance with National and Regional Policy. **As part of its draft LDP2 to be made available to the public, SBC should provide**

compliance matrices which show, document by document, section by section, how each obligation is – or is to be - met.

- i. Section 3.1 talks about the SES Proposed Strategic Development Plan and states that “This vision will guide the development of the policies and proposals in the Local Development Plan.” It is therefore important and the following comments in red are questions on specific parts of this section to which answers are requested.

“Sustainable growth has been achieved **please provide details of the sustainable growth which has been achieved in the Borders; for example, through LDP1** by carefully managing those assets that provide the most benefits **which assets are these in the Borders? When and where will they be specified for LDP2?** and by making well designed, successful places where people can thrive. More people are able to afford a home in a place near where they work. **Does this mean that potential commuters from say Peebles to Edinburgh will be discouraged from moving to Peebles and encouraged to remain in Edinburgh?** A series of cross boundary transport projects have made travel by public transport easier and more people are cycling and walking to work. **For those living and working in the main Border towns, what plans are there to provide more public transport and cycling routes? For people living in Peebles (particularly commuters travelling to Edinburgh), what are the cross boundary transport projects which “have made travel by public transport easier”?** The economy continues to grow and the region remains an outstanding place to live, work and visit. Communities in the region are healthier and there is less inequality and deprivation”.
- m. Section 4.2 specifies “The proposed SESPlan seeks to ensure LDPs identify, safeguard and deliver a sufficient supply of employment land taking account of market demands and existing infrastructure.” **Whilst the MIR puts forward proposals for the allocation of employment land, there is no assessment given of market demands and existing infrastructure. These need to be provided for review and comment prior to any commitment in LDP2 to earmark further employment land.**
- n. Section 5.8 specifies that “The Scottish Borders has outstanding scenic qualities within its landscape and planning policy seeks to protect it.” **Please provide evidence of how planning policy has in fact protected our outstanding scenic qualities, for example through actions taken in LDP1.**
- o. Finally in terms of general observations, with regard to the location of whatever is determined to be the necessary additional quantity of housing, what consideration has been given to achieving this requirement by means of building a new town similar to Cardrona at a sensible point along the railway line from Galashiels to Edinburgh? Surely this is a sensible option to pursue given the taxpayers’ huge investment in the railway and the ability through such an approach for residents to be close to but not encroaching upon a major Borders town (Galashiels).

2. Specific to Peebles.

- a. The proposal for further housing and expansion of the industrial estate at South Park fails to take into account the many objections raised concerning the current and smaller development proposal for this site – all of which apply *but even more so* to this proposal. **Objections raised against development reference 18/01026/18 should all be read across and considered by this reference to be objections to the MIR’s proposal for the further allocation of land for development in the South Park area, which should be withdrawn and not included in LDP2.**
- b. Section 3.13 specifies “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.” **It is not acceptable for SBC’s position to be that options are limited. This is vague and open to interpretation and contrary to the clear assurance¹ by the Leader of SBC, Councillor Shona Haslam, that “For land on the South of the river a new bridge would have to be built prior to any development taking place. There are no plans and no money in the budget for the next ten years for such a bridge”. Therefore there is no option, limited or otherwise, and LDP2 should include no possible housing or industrial estate developments for the south side of Peebles, with no caveats.**
- c. Section 4.5 states “One of the main challenges is to find new employment land for business and industrial use in the vicinity of Peebles.” **See the various observations in section 1 above regarding the lack of substantiation of the need for such land.**
- d. Section 4.5 states “An independent study was carried out by consultants to identify site options within the vicinity of Peebles. The study findings have informed the potential site options set out in the MIR”. **This is a critical study against which comments are provided separately in section 3 below.**
- e. Section 5.7 states “Historically Peebles has a vibrant market for housing development and the development industry will continue to seek further land in this area to meet demand. However, due to a number of physical and infrastructure constraints further housing site options are limited. Consequently consultants were appointed to prepare a study to identify both potential short and long term housing options as well as to identify sites for business/industrial use and their findings have influenced the options being suggested.” **As is stated in 2b above, it is not acceptable for SBC’s position to be that options are limited. This is vague and open to interpretation. A clear policy decision needs to be expressed as part of LDP2 that no new housing development will be approved until a. the capacity of existing infrastructure (in the fullest possible sense) has been increased in line with pre-agreed objective and quantitative improvements to catch up with the**

¹ Peeblesshire News, January 18th, 2019.

needs of the current population and b. any subsequent new housing development is demonstrated to be supported by a financed infrastructure plan, both a and b being endorsed by providers and Peebles Community Council as adequate. This is wholly consistent with the assurance given by the Leader of SBC, Councillor Shona Haslam, who has stated regarding the Peebles' sites for major development included in the MIR that "our infrastructure would have to be improved prior to any development taking place"².

- f. See comment in 1j above regarding schooling.

3. Western Rural Growth Areas: Development Options Study.

- a. This is a key document since, as was quoted above, "The study findings have informed the potential site options set out in the MIR".
- b. Section 3 of the Specification of Requirements pertaining to this study states that "The development areas identified should be free from significant constraints and that those identified for development in the short to medium term i.e. during the lifetime of Local Development Plan 2, are capable of being developed. Engagement with landowners and developers to ascertain the effectiveness and desirability of the sites to be identified within the report will be required as part of the study. Consideration of necessary infrastructure and how it can be delivered will also be necessary for each of the development option areas identified." However, despite this requirement and the clear statements of the Head of Council regarding the constraints applying to Peebles as quoted above, the Report has identified sites in Peebles and even identified some of them as preferred. **This is a fundamental flaw in the report which, since it has informed the site options laid out in the MIR, can only mean that the MIR itself is flawed.**
- c. The Report states in the Executive Summary that "A project steering group, with representatives of key Council services, ensured that infrastructure requirements associated with each potential development site was factored into the analysis." **For each potential development site in Peebles please provide the detail of the infrastructure requirements which were factored into the analysis.**
- d. The Report makes use of non-defined terminology. It talks throughout about short term and long term. Specifically, it states that some sites in Peebles "would require enabling infrastructure and would therefore be longer-term projects." **What is a "longer term project"? Surely, if it falls significantly outside of the timeframe of LDP2 – which anything on the south side of Peebles does due to the firm assurances given that there will be no new development there until a new bridge is built and infrastructure is**

² Peeblesshire News, January 18th, 2019.

improved - then, because it is so far outside the relevant timeframe, it should be excluded.

- e. The consultants engaged “with landowners and developers on the desirability and effectiveness of the sites being proposed”. **Did they have any consultation with Peebles Community Council or other local interest groups – and if not, why not?**
- f. The use of this study to shape LDP2 is highly questionable because **it is addressing a wholly different timeframe.** Section 1.6 states “The study therefore seeks to identify a range of options for development over the next 20-30 years.” **To include in a plan which runs from 2021 – 2026 a site which might be suitable for development in 10 - 15 years’ time (once a new bridge has been built, infrastructure has caught up, etc etc) is surely misleading.**
- g. Section 1.7 states that “In terms of housing requirements, an indicative figure of 1,000 homes was given by the Council, though it was recognised that this was only aspirational, and that large sites were likely to be few in number.” **How does this number relate to the number of 3,841 houses referenced in section 1.d above and why does Peebles have to take such a high share of the housing “requirement”?**
- h. The definition in section 2.8 of a “primary constraint” is “where no development was considered appropriate”. Table 2.1 includes roads as a primary constraint. **On the basis of the well publicised issues with Caledonian Road and the existing bridge being at capacity, there should be no doubt that any further development of South Park in Peebles falls into the category of “no development was considered appropriate”. If no development in this area is appropriate, why is the site still included?**
- i. In section 5 of the report, it is identified that there were 4 sites which “have some potential for development”. **But for South Park this is not possible within the timeframe of LDP2 and quite possibly LDP3 and beyond, given the constraints mentioned by the Leader of the Council and in this document. Why has it been included?**
- j. In its commentary on the South Park and Edderston option on page 23, the Report identifies as a Key Issue “Problems with access to the site through the town, potentially requiring new link road and/or upgraded Tweed crossing.” The mitigation section has no mitigation for this issue – which is, to say the least, rather fundamental. **How is it that when there is no mitigation put forward – because no mitigation currently exists – that this option is still included in the MIR by SBC?**