

**From:** [REDACTED]  
**Sent:** 30 January 2019 13:53  
**To:** localplan <localplan@scotborders.gov.uk>  
**Subject:** MIR 2 Objections

Please find attached objections to the Main Issues Report.

Can you please confirm this has been received and will be included in the consultation process.

I note from the main issues report that a consultant was used to select sites for the Peebles allocations.

I would be grateful if you could advise who commissioned this work, how much the council paid to the consultants, who the consultants were and can I be sent a copy of the consultants report.

Regards

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## Objections to MIR 2

### Objection - Site SPEEB008

The above site is adjacent to a site that is currently proposed for persimmon homes to build 71 units on. There have been an unprecedented number of objections to the persimmon proposal, ranging from the Community Council, Local Residents and School PTA's and it is beyond comprehension that Scottish Borders Council (SBC) has seen fit to put this site forward for inclusion on the next LDP. My objections to the inclusion of this site are listed below.

- Caledonian Road – This road is the only way into and out of the proposed site. It houses the Ambulance and Fire Station and operates as a single track road. The issues with Caledonian roads layouts, navigation and capacity have been well documented on the numerous objections to the Persimmon Development, my objections have been included in this e-mail. It has been well documented that the road does meet standards for current capacity let alone the proposal for 71 units at South parks, 40 at Tweed bridge court and now what appears to be a site capable of housing as a minimum 450 houses.
- Tweed Bridge – It has been well documented that this is a single point of failure for people who live on the South side of the Tweed. A SBC traffic survey carried out pre-Christmas 2018 has highlighted that the bridge has exceeded its capacity at peak AM and PM times. There have been numerous statements made over the years by local councillors and SBC officials that the South side of the Tweed could not be developed until a second bridge is completed. Despite the caveat on the LDP for a second bridge, what happens in practice and has been seen over the years is development occurs by stealth and caveats on LDP's and pronouncements by officials are worthless.
- Mixed use – There is an industrial unit located at the top of South Parks Road, originally constructed and used for light industrial use. Over the years the council have seen fit to allocate units to businesses with no regard of their use or consideration for local residents. Caledonian Road/South Parks services the surrounding area that is residential housing, however with the changing types of business's using the industrial estate instances have arisen of speeding vehicles through the residential area, increased vehicle flows from the farm shop and changes in vehicle types to large work vans, none of which were envisaged when the industrial and residential sites were developed. At one point the council saw fit to lease out a unit to a local bus company that could not fit its buses into the industrial unit and caused blockages on the road when parking. The council should refrain from developing mixed use sites.
- "Any development must ensure it respects the existing built form and landscape design, to ensure" A pretty worthless site requirement given the current development proposals attempt to over develop the site with housing that is not reflective of surrounding developments or standards in SBC's Placemaking and Design policy.
- "Any development must integrate and connect with the existing housing land to the east by way of" This statement from the LDP (Page 40) would halt any development on this site as there is no possible way to connect from this site to the existing development as has been shown in the submitted land plans from the developer and reviewed and agreed by SBC. This was also a requirement in LDP1 for the site that currently proposed for development and is being ignored by SBC's planning team.

- “Transport Assessment required for any Development” – This was the case for the site on LDP1 and the requirement has been ignored by SBC in the current planning process. Any independent Traffic Assessment would highlight similar issues to those recorded by SBC documents that saw this area rejected for development in 2012, 2013 and 2014. SBC Roads Planning Service have displayed a complete lack of impartiality in reporting on the roads infrastructure around South Parks and Caledonian Road or following site requirements laid out in LDP1. By placing this site on the LDP with a Traffic Assessment requirement gives no one any confidence this would be undertaken as evidenced by the behaviour of SBC Roads Planning Team with the current proposal.
- Construction of a second bridge will not alleviate the bottleneck of Caledonian road that all traffic to this proposed site would need to use.
- Caledonian road does not comply with minimum requirements for visibility and design of footpaths and cannot be modified to do so. This has been well document by a resident’s traffic survey and would no doubt be upheld should an impartial Traffic Assessment actually be conducted.
- The LDP for the current development provided for 50 houses, the development proposal exceeds this by 40%. Even at a conservative estimate of 450 units being built on this site, this will gridlock the surrounding roads.
- The current industrial estate appears to have no restrictions on the business’s that can be housed there. There has been a long standing issue with speeding vehicles using the industrial estate coming down through the residential area and across the mini round about at South Parks/Caledonian Road, with a number of near misses being recorded. Adding more housing and industrial units increases the traffic using the road, likelihood of speeding and risks to personal and property safety.

## **Objection -Peebles Sites in General**

- The MIR2 document has allocated land that can potentially have 1,000 to 2,000 units built on while the allocations for the rest of the borders are small double digit land parcels. This is an unacceptable allocation and reflects the council's failure to develop the rest of the borders.
- The LDP provides for a number of units to be developed and appears to be set in stone. What invariably happens is there are windfall sites developed that are not then deducted from the LDP plan resulting in over development of areas and pressure put on infrastructure as has happened in Peebles over the last few years.
- The land proposals for Peebles form no overall strategic plan and are random scattered pieces of land, many of which if developed will result in out of town housing estates with no access to social or leisure facilities other than by car. This approach does not fit with the strategic aims laid out in the MIR2 or with the placemaking and Design policies of SBC.
- Infrastructure – Peebles infrastructure is already straining at the number of houses that have been built from LDP allocations and windfall sites. A doctors appointment has a 3 week lead time, the primary schools are approaching capacity, the high school already has capacity issues and is not fit for purpose in this day and age. The council have announced that Peebles will not get a new High School for another 13 years which is another great example of SBC's attitude that Peebles can be developed for new houses but zero investment for its infrastructure.
- The council have failed in three attempts to secure a 3G all weather pitch for Peebles, yet have managed to do so in every other major borders town, and have no problem finding the last blade of grass in Peebles to develop on.
- All of the residents of these proposed developments will use Tweed Bridge, perhaps not as frequently as residents on the South side of the Tweed. Despite site requirements stating development on the South side is halted this does not stop traffic flows increasing from the North Side of Peebles development and putting the current bridge under increased strain.
- APEEB056 – This residents of this 150 site development will all need to use Rosetta Road to travel into Peebles, this road already has severe capacity issues and has no way of being expanded. The other alternative is to access the A703 via a single track road at the crossings where there have been a number of reported collisions. Neither access to this site is appropriate or safe.
- Section 3.8 of the MIR2 states in its main aims "Build sustainable communities which are attractive and distinctive", "places to live in accordance with good placemaking and design principals" and " Encourage better connectivity by transport and improve digital networks" Quite how the council think that by proposing random sites on the outskirts of town, with no connection to existing settlements, that will require cars to access Peebles facilities and will be swallowed up by developers using off the shelf designs fits with any of the above.
- 2.1 Population increase from 115,020 in 2017 to 116,777 in 2026 = Forecast population growth of 1,757. Given there will be deaths and people moving away from the area the current MIR2 proposals is a gross over development of the borders for the forecast population growth.
- 2.4 Give this forecast, there is no reason to allocate large parcels of land in Peebles which predominately get developed with 4/5 bedroom houses

- 2.5 If completions have dropped to their lowest level since 2005, why are the council allocating so much land for development, especially taking into account points 2.1 and 2.4 above. The demand for housing is unlikely to increase in a Post-Brexit UK.
- 2.7 With unemployment levels at this rate, the council should be focussing on building affordable rented accommodation. A Key function of SBC is to attract inward investment, this statistic suggests they are failing and the large allocation of land to develop houses is a way to plug revenue shortfalls from failed inward investment policy.
- 3.1 Peebles currently has very low demand for all housing other than rented affordable housing. Allocating land that will generate around 1,000 additional houses, the majority of inhabitants will commute to Edinburgh for work is in direct opposition to the vision outlined in the SESplan proposed for 2038
- 3.6 This is being eroded in Peebles due to the poor quality, design and visual destruction of landscapes that has been encouraged in the last 20 years by SBC in their approvals of housing units that jut out and do not form any natural boundary with the town.
- 3.7 Inviting the development of 1,000 houses which will mostly be used by commuters does not comply with this statement. The road network is unsuitable for adding bike lanes, Public transport to and from Edinburgh is limited and only goes to the centre of Edinburgh. To get to the Gyle, where the majority of large business has now re-located takes nearly 2 hours one way by public transport.
- 3.13 "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." This statement is contrary to sections 3.7 and 3.8 and acknowledges that development in Peebles is seen by SBC as ideal for attracting people from Edinburgh, rather than developing housing for local needs. SBC see the town as a place to encourage random large scale development with no strategic planning as it is easy for the council to attract developers and pocket the council tax with no care about the quality of living of the people of Peebles
- 4.5 An independent study was carried out by consultants to identify site options within the Vicinity of Peebles. - The consultants should be named, report released for review and should have been included in the consultation materials
- A significant Investment in borders railway has taken place yet apparently there is no significant land to allocate or left to develop in Galashiels. Is this not an incredible oversight and lack of long term planning that should have been highlighted before locating the railway in Galashiels. Having pointed out that Peebles has no such connectivity to Edinburgh but the council see fit to allocate the vast majority of the land proposed in this plan to Peebles
- There is significant development proposed for Peebles and Eddleston both of which rely on the A703 to access Edinburgh. The A703 is in a terrible state of repair with surfaces destroyed by the increase in traffic over the years and no investment in maintenance. Many sections, especially through Eddleston village, resemble farm tracks and it again shows a lack of joined up thinking in the MIR2 plans that more traffic is expected to use this road with no proposed improvements.

- **7.3 SESPLAN developments designed so that density, use and layout helps reduce the need to travel by car. Developments should include clear and direct links to public transport nodes.** Of all of the sites allocated for Peebles in this plan none have clear and direct links to public transport. The sites will place a heavy reliance on the use of cars failing this particular aim. Having commuted to Edinburgh for over 20 years SBC should be aware there has been significant growth in traffic using the Hillend and Straiton junctions which are now over capacity. Continued housing development in the Peebles, West Linton and Penicuik areas with no public transport strategy has resulted in this problem. East Lothian and Midlothian council have sanctioned an enormous amount of land for development that will need to use these junctions, while many of the large scale employers in Edinburgh have re-located to the Gyle necessitating the use of a car as there are no direct public transport links from Peebles. To consider putting forward the number of development sites in Peebles without having a public transport and maintenance plan for the A703 in place is short sighted and highlights the opportunistic nature of the LDP allocated sites in Peebles
- The LDP mostly favours developing Greenfield and agricultural sites rather than brownfield. Brownfield sites should always be prioritised ahead of Greenfield sites.
- SBC have no Transport, Education, Economic plan, which supports the housing allocation proposed for Peebles.
- Although funded from the public purse, the entire LDP process favours land owners and developers over the public. The LDP provides a council supported vehicle for land owners to advertise land for sale and provides developers a pick and mix approach to development. Taking the Peebles allocations, this is a series of sporadic sites that are not connected to public transport networks, existing development or placed in locations where there is housing need failing a number of the key objectives of the LDP. What we have in the LDP allocation for Peebles is the easiest place in the borders for a developer to make a sale and the council to pocket the council tax. The repercussion of this is when proposals for development proceed on the allocations, often ill thought and inappropriate, the local community gets left by the council to point out the obvious flaws and issues development will cause. Developers can fund consultants and have teams of planning staff who frequently submit pro –development reports that have no substance or point, which then require challenge by local residents having to analyse hundreds of pages of policy and legislation to make informed Opposition. Hardly a fair fight but SBC support this by allocating land on the LDP without any due diligence.
- The LDP is 120 pages long, contains many technical issues and terms with references to many other policy documents. I understand the council spend a significant amount of public money and resource in compiling and publicising the LDP, which is not in a format for the public to easily digest. While accepting the LDP is a Scottish Government compliance requirement , it really functions as an advertisement brochure for land owners to sell and developers to pick off sites for development, which does not fit with **Councillor Tom Miers opening statement “Our overarching purpose is to encourage new growth and investment while preserving and enhancing the unique landscape and built heritage that characterises the Scottish Borders.**

